

**Nationally Significant Infrastructure Project: EN010149
Springwell Solar farm**

**Response to The Examining Authority's written questions and requests for
information (ExQ2) issued on 2 September 2025**

Prepared by Lincolnshire County Council (LCC)

September 2025

The following table sets out the Council's response to the Examining Authority's (ExA's) written questions and requests for information (ExQ2) where a response from the County Council was sought.

ExQ2	Question	LCC Response
Q1.	General, Cross-topic and Need	
Q2.1.2	<p>Cumulative Effects</p> <p>An action point from Issue Specific Hearing (ISH) 3 [EV6-008] [EV6-009] was for the Applicant to provide an update to the Interrelationships with other Nationally Significant Infrastructure Projects and Major Development Schemes Report [REP1-068] at either Deadline (D) 3 or 4. Further, the Applicant has provided a revised Cumulative Effects Assessment [REP3-014] that takes into account the published EIA Scoping Report for the proposed NGNS.</p> <p>a. Applicant, please provide the updated interrelationships report.</p> <p>b. Local Authorities, do you accept the findings of the revised cumulative effects assessment? If not, please set out fully why you disagree.</p>	<p>LCC has reviewed the updates to the Chapter 16 Cumulative Effects [REP-015] and the revisions following the publication of the EIA scoping opinion for the proposed NGNS. Updates to the assessment predominately relate to the consideration of the NGNS, LCC is satisfied with the scope of this assessment.</p> <p>However, some points of disagreement remain regarding conclusions made on the significance of inter-project cumulative effects in the overall assessment of cumulative effects with other developments, which the Council considers to be under-assessed. In particular those related to landscape and visual impact, waste, and the loss of best and most versatile (BMV) agricultural land. These areas of disagreement are detailed in our Local Impact Report (LIR), our written submissions from ISH2, ISH3, and ISH4 [REP3-079], and in the Statement of Common Ground (SoCG). The recent updates to Chapter 16 do not fundamentally alter our position on these matters.</p> <p>LCC welcomes the development of the Interrelationship Report throughout the examination period, which is to be updated and submitted by the Applicant at Deadline 4.</p>

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		<p>The applicant has shared an updated draft of the interrelationship report with the Council and the following feedback to the applicant on the draft document was provided:</p> <p><i>As noted at paragraph 1.1.2 of the report it is acknowledged that the current assessment of interrelationships is based on the best available but limited information at this early stage. The commitment to ongoing engagement and collaboration at 1.1.3 is therefore welcomed.</i></p> <p><i>Paragraph 2.1.6 Need for cooperation agreements</i> <i>The Applicant position that there isn't an immediate need to enter into a cooperation agreement due to timescales is noted. This could result in missed opportunities to minimise impacts and negative cumulative effects, particularly with Navenby Substation and Leoda solar farm, where their construction periods all overlap with the 'peak' construction period of Springwell, in addition to all the construction periods of Fosse Green, Leoda and Navenby Substation mostly occurring entirely simultaneously with Springwell. The commitment to exploring the opportunity to enter into a cooperation agreement with other developers, should the need for this arise is however welcomed.</i></p> <p><i>Overall, we remain concerned about statements and conclusions within the report stating that cumulative impacts would be minimal, particularly in light of overlapping construction periods.</i></p> <p>LCC will provide further comments at deadline 5 once it has had an opportunity to review the submitted document at deadline 4.</p>

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3	Air Quality	
Q2.3.1	<p>Revised Plume Assessment</p> <p>Following discussions at ISH3 [EV6-002] [EV6-003] the Applicant has undertaken an additional Plume Assessment [REP3-077] that incorporates atmospheric dispersion modelling and considers particulate matter. The UK Health Security Agency has set out [AS-028] that it has overcome its concerns. Confirm whether you are content with the methodology and assumptions adopted, as well as the overall findings of the revised assessment</p>	<p>LCC has no comments on the methodology and assumptions adopted and note that a full air quality assessment will be re-run at the detailed design stage using confirmed product data. LCC defer to the UK Health Security Agency and NKDC, as pollution control authority on air quality matters.</p>
4.	Biodiversity	
Q2.4.3	<p>Ecological Steering Group</p> <p>The ExA note that terms of reference for the ecological steering group (ESG) have been included in the updated Outline Landscape and Environmental Management Plan (oLEMP) [REP3-037].</p> <p>a. Applicant, confirm the funding mechanism for the ESG and, if relevant, submit a signed section 106 of the Town and Country Planning Act 1990 (s106) agreement into the examination.</p> <p>b. Lincolnshire County Council (LCC) and North Kesteven District Council (NKDC), are you content with the Applicant's proposed terms of reference for the ESG?</p>	<p>b. LCC considers that amendments and additions are required and detailed comments on the proposed ESG Terms of Reference included in the Applicant's oLEMP (REP3-037) are provided below:</p> <p>LCC is pleased that the Applicant is in agreement with the establishment of and Ecological Steering Group (ESG). LCC has the following specific comments and queries on the proposed Terms of Reference (ToR) for the ESG:</p> <ul style="list-style-type: none"> 7.2.1: LCC suggests that the ToR are referred to as 'Draft' at this stage with the final ToR agreed at the first meeting of the ESG. 7.2.1: Discussions relating to the monitoring of BNG and the role of the ESG in this monitoring are still ongoing with the applicant. If BNG

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		<p>monitoring is to be within the remit of the ESG, the ToR will need to be amended to reflect this.</p> <ul style="list-style-type: none"> • LCC suggests the addition of the following text after 7.2.1 to place a clear obligation on the Applicant to give proper consideration to any reasonable recommendations from the ESG: <ul style="list-style-type: none"> - The Applicant shall have regard to any reviews, recommendations or updates received from the Group in accordance with its terms of reference and thereafter employ reasonable endeavours to implement any competent recommendations including, where necessary, through proposing to the Group such alterations to ecological management measures as the Applicant considers appropriate, having regard what is reasonable, practicable and achievable. • 7.2.3: LCC is unclear why specific reference is made to Works Nos. 1, 2, 3 and 4. • 7.2.3: LCC suggests that the ESG is convened at least 6 months in advance of the commencement of works. This will allow the group to feed into habitat establishment works. • 7.2.5: LCC suggests that this is amended to read "... representatives from relevant local nature conservation organisations...."

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		<ul style="list-style-type: none"> 7.2.6: There is a mistyping in relation to the number of members required to form a quorum at ESG meetings. 7.2.7: LCC suggests that the ESG should meet at least twice annually for the first 10 years and then may be able to move to a single annual meeting once there is confidence that any initial establishment problems have been overcome. The precise nature and timing of meetings, including the requirement for any site visits, should be flexible to allow both the Applicant and other members of the ESG to gain the most benefit. 7.2.8: LCC welcomes the Applicant's proposal to meet reasonable costs. Clarification is needed around the mechanism for securing the funding of these costs.
7.	Cultural Heritage	
Q2.7.3	<p>Archaeological Desk Based Assessment and outline Written Scheme of Investigation</p> <p>The Applicant has produced an updated ADBA and an updated Outline Written Scheme of Investigation (oWSI). LCC and HE are asked to:</p> <ol style="list-style-type: none"> Identify any outstanding concerns. Advise if it is acceptable for these matters to be resolved in detailed design stage; and Advise whether you consider that the oWSI provides satisfaction that these matters will be addressed post-consent. 	<p>The Applicant, LCC and Historic England are undertaking regular meetings to resolve any limitations in the existing oWSI and ensure that the document is fit for purpose.</p> <p>LCC is pleased to note that the oWSI has seen revision following meetings and feedback provided by Historic England and ourselves. As agreed with the Applicant and Historic England, the approach will be based on evaluating the areas of impact once these have been identified at detailed design stage, with a question-led approach contributing to the formulation of the mitigation strategy once the presence, significance and impact is understood from the evaluation results. The main point of debate is the</p>

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		<p>location of the remaining evaluation trenches, which will not be known until detailed design is complete. We are pleased to see that an Archaeological Clerk of Works has been included within the proposed archaeological management strategy.</p> <p>Blanket trenching is not being considered.</p> <p>LCC is confident that these matters of debate yet to be agreed can be appropriately dealt with at detailed design stage, as the trenching requirements cannot be developed until we have the detailed design information.</p> <p>The oWSI contains appropriate provision for Task Specific Written Schemes of Investigation and Location Specific Written Schemes of Investigation to be produced as part of the archaeological works that the Applicant has committed to. These documents would need approval by LCC prior to any works being undertaken and thus we have confidence that there will be sufficient and appropriate programme of archaeological evaluation undertaken to inform the archaeological mitigation and management strategy.</p>
Q2.7.5	<p>Temple Bruer - Heritage Impact Review</p> <p>At D3 an Interested Party (IP) [REP3-083] submitted an independent report on the impact of the Proposed Development on the Temple Bruer Preceptory Church Tower Grade I Listed Building and Scheduled Monument.</p> <p>a. Applicant, provide a detailed response to the findings and conclusions of the report including the following points that are raised:</p>	<p>LCC advises that the independent report does not alter its position that Temple Bruer can be scoped out of the ES, as the contribution of setting to the Scheduled Monument and Grade I tower would not be materially affected. The report does, however, draw attention to the wider historic estate, including Thompson's Bottom Farmhouse (Grade II), which post-dates the preceptory but stands on land historically linked to it. This broader context may warrant further consideration, and the ExA may wish to reflect on the issues raised.</p>

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	<ul style="list-style-type: none"> • The extent to which the former Knights Templar Estate boundary forms the setting of the heritage assets and contributes to the significance of these assets. • The impact on kinetic views of the Preceptory along Warren Lane and how intervisibility between the Preceptory and the Proposed Development in this location has been considered. <p>b. LCC, NKDC and HE, the ExA note that in the relevant SoCGs with the Applicant, it is agreed that these assets can be scoped out of the ES. Does the independent report submitted at D3 highlight any issues that would change the position of the Councils and/or Historic England (HE)?</p>	
Q2.7.6	<p>Collective value of Non-Designated Heritage Assets</p> <p>Annex 14 of the updated ADBA [REP3-023] includes the Applicant's assessment of the impact of the Proposed Development on the collective value of non-designated farmsteads. LCC are asked to comment on the Applicant's conclusion of slight impact (not significant) and explain its position if it disagrees with the Applicant.</p>	<p>LCC welcomes the Applicant's use of the group value methodology developed with LCC as a first step in assessing the collective significance of historic farmsteads. Applying this framework, the farmstead group is judged to have medium value, the scheme introduces a medium impact, and the outcome is Minor Adverse (not significant). LCC accepts the Minor Adverse outcome in this case but notes that the approach is still developing and may need refinement or adjustment in future to better reflect how such collective value is understood and assessed.</p>
8.	Draft Development Consent Order (DCO)	
Q2.8.1	<p>Articles 40 and 41</p> <p>Following discussions at ISH4 [EV7-006] [EV7-007] and a subsequent meeting between the parties, the Applicant has made changes to the oLEMP [REP3-037] and the oOEMP [REP3-039], including the addition of a maintenance schedule. Confirm whether these alterations address your remaining concerns.</p>	<p>LCC acknowledges the updates made to the oLEMP and oOEMP and welcomes the inclusion of Section 2.10 in the oOEMP. The introduction of a requirement to provide an annual planned maintenance schedule for vegetation removal is a positive step and goes some way toward addressing our previous concerns, particularly by offering advance notice of planned removals. The commitment to replacement planting of TPO trees, as set out in paragraph 5.3.20 of the oLEMP, is also noted and welcomed.</p>

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		<p>However, LCC remains concerned that the draft DCO continues to confer a blanket power to remove trees, with unfettered authority that is considered excessive. As such, the concerns raised in our previous submissions and at ISH4, as summarised in our Deadline 3 submission (REP3-079), remain unresolved.</p> <p>To strengthen the proposed approach, LCC recommends that Section 2.10 of the oOEMP should specify:</p> <p>The point in the year by which the annual maintenance schedule must be submitted to the relevant planning authority, and</p> <p>The minimum notice period required ahead of any planned vegetation removals.</p> <p>Furthermore, it remains unclear how the proposed schedule would address LCC's concerns regarding the potential impact on Biodiversity Net Gain (BNG) calculations.</p>
Q2.8.4	<p>Requirement 3</p> <p>The Applicant has proposed a number of changes to R3 of the dDCO [REP3-005]. Do you consider such changes to be acceptable?</p>	<p>LCC notes the changes to requirement 3, including the requirement for the Applicant to submit a timetable for the construction of the phases of the development with a plan identifying the phasing areas. The Applicant's stated reasons for the changes are to 'reflect recently made orders, to provide clarity as to the content of the phasing plan in line with The Oaklands Farm Solar Park Order 2025 and to allow for flexibility in the construction phasing of the authorised development, as per the approach The Byers Gill Solar Order 2025' (Schedule of changes to the draft DCO - REP3-073).</p>

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		<p>Whilst LCC does not, in principle, object to the inclusion of the flexibility sought by the applicant, clarification is required on how amendments to the written scheme would be agreed under Part 3 of the requirement as currently drafted. It is also necessary to explain how such amendments would interact with Part 2, which states that the scheme submitted and approved pursuant to sub-paragraph (1) [paragraph 42 in the draft DCO] must be implemented as approved. LCC recommends that any amendments proposed under Part 3 should be subject to a formal approval mechanism to ensure transparency and consistency in implementation. LCC agrees with further wording at (4) ensuring the undertaker notifies the relevant planning authority of the final intended phases prior to commencement.</p> <p>Please note the numbering of requirement 3 needs adjusting as it starts 3. (42) with sub paragraphs 1 to 5, this should read 3. (1) and sub paragraphs 2 to 6.</p>
10.	Landscape and Visual Impact	
Q2.10.2	<p>Statement of Common Ground with Lincolnshire County Council</p> <p>It was understood by the ExA at ISH2 [EV5-002] [EV5-003] that there is currently disagreement between the Applicant and LCC on the Landscape character effects both in the wider area generally and within the area of Springwell east in year 10 of operation but this does not appear to be reflected in the SoCG. Provide an updated SoCG that accurately reflects the current position.</p>	<p>Following discussion with the applicant and subsequent email exchange to clarify this point, the NKDC SoCG (REP3-059) at section 16-13 of table 16 now reflects our position, however the LCC SoCG (REP3-057) currently does not. The LCC SoCG (REP3-057) will require updating to include section 16-13 of the NKDC document.</p>
Q2.10.6	Design Commitments	<p>We have reviewed the changes made to the Design Commitments Rev 2, and these reflect discussions that have recently been held with the</p>

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	The ExA note that following discussion with the Local Authorities, the Applicant has updated the Design Commitments [REP3-030] to include revised wording for commitments D17 and D20 as well as additional commitments D25 and D26. Are you content with the updates made?	applicant. There are no further comments on commitments D17, D20, D25 and D26.
Q2.10.7	Inter-Project Cumulative effects with National Grid Navenby Substation The ExA note that in ES Chapter 16 [REP3-014] the Applicant states that <i>"at a meeting between the Applicant's landscape consultant, LCC and NKDC on 08 July 2025, it was agreed that additional hedgerow planting alongside the A15 north of Gorse Hill Lane (as initially suggested by both LPAs) was unlikely to result in a material difference to the overall significance of effect on views from the A15. It was agreed by all parties that this additional planting was not essential."</i> Do LCC and NKDC now consider this matter agreed?	Yes, it was agreed that this additional planting was not essential. Therefore, this matter is now agreed.
13.	Traffic and Transport, inc Public Rights of Way	
Q2.13.3	Cumulative Traffic Assessment The Applicant [REP3-075, Appendix 3] has undertaken a cumulative traffic note to include the proposed NGNS and other relevant developments. The assessment states: <i>'The cumulative assessment is focussed on those developments where a significant impact could occur on the A15 corridor, this being the most sensitive location within the study area and the corridor featuring junctions with limited peak hour operational spare capacity'</i> . Given this, the ExA is concerned	The assumptions and traffic generation used for Springwell are acceptable. With regard to cumulative impact, in planning it is normal to consider committed developments in Transport Assessments, the Leoda project is not yet submitted and no traffic data is available. It would be on the Leoda development to include Springwell figures as it is being submitted later.

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	<p>that potential cumulative effects on other links in the study area has not been assessed.</p> <p>a. Applicant, provide a further assessment that considers the whole traffic and transport study area.</p> <p>b. LCC, are the assumptions used for traffic generation and flows for each relevant development, the ruling out of the Leoda project and the overall findings of the assessment accepted?</p>	
Q2.13.5	<p>Public Rights of Way</p> <p>The Outline Public Rights of Way and Permissive Paths Management Plan (oPROWPPMP) [REP3-044] has been updated to address the outstanding concerns of LCC. Further, the Applicant has noted [REP3-075] that the creation of new PRoWs should include the dedication of such new paths and agrees a deed of dedication would ordinarily be required. However, under the powers in the dDCO [REP1-006], the Applicant does not consider any further amendments are required in this respect, as Article 11 of the dDCO [REP3-004] does the same job and no additional provision in this respect is necessary.</p> <p>a. Have the amendments to the oPROWPPMP fully addressed your concerns?</p> <p>b. Is the Applicant's view with regard to the dedication of new paths accepted?</p>	<p>LCC are satisfied that Section 11 of the DCO will be an effective dedication, however the Council believes the wording would be best to say "created" or "<i>upgraded</i>" rather than improved. This would apply to Section 11, Para 17 or Schedule 2 and Part 1 of Schedule 6 of the draft DCO.</p> <p>The reason for this suggestion is that "<i>upgraded</i>" more closely relates to a change of public rights, whereas "<i>improved</i>" relates more to a change in physical surface etc.</p> <p>LCC are content with the changes made in the oPROWPPMP</p>

