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Your Ref: EN010149

Interested Party Number: SWSF-SP005

Date: 23 September 2025

Dear Sir/Madam

**Application by Springwell Energy Farm Limited for an Order Granting Development
Consent for the Springwell Energy Farm project.
Deadline 4 submissions for Lincolnshire County Council (LCC)**

This letter contains LCC's comments on further information and submissions received at
Deadline 3.

Ecology

LCC has reviewed the updated ES documentation submitted by the Applicant, including Chapter 7 (Biodiversity [REP3-013]), and Volume 3 Appendix 7.1 (Preliminary Ecological Appraisal [REP-020]), 7.14 (BNG [REP3-022]. Chapter 16 (Cumulative Effects [REP3-015]), and the Environmental Management Plans [REP3-034, REP3-041, REP3-048, REP3, 038]. LCC's comments are set out below.

Within Chapter 7 LCC notes the updates made and welcomes the clarification of the methodology used to survey and classify hedgerows. Within Volume 3 Appendix 7.1 LCC notes the correction made in relation to the misidentification of a rare plant in REP3-020 and has no further comments to make.

Volume 3 Appendix 7.14 – Biodiversity Net Gain [REP3-022]

- LCC notes that strategic significance has been updated in the biodiversity metric and is now in line with biodiversity opportunity mapping for Central Lincolnshire.
- LCC welcomes the clarification of the Applicant's approach to groups of trees and hedgerow trees (2.6.1) in the biodiversity metric and considers that this is an acceptable and precautionary approach. LCC also welcomes the clarification of habitat parcels and polygon IDs in Tables 3 and 5 and the Council notes the updates to the baseline values and impacts on areas / lengths and number of units provided in Tables 4 and 6.
- LCC welcomes the additional clarity provided by Appendix 1, Figures 2 and 3 showing how mapped habitat polygons and linear features relate to lines in the BNG metric.
- LCC notes that the current predicted BNG percentages are 28.94% for area habitats, 22.38% for hedgerows and 13.59% for watercourses. LCC is of the opinion that the habitats proposed for creation are appropriate and with appropriate management can realistically be delivered. Details of management will need to be set out in the final Landscape and Ecology Management Plan and delivery of BNG secured with a specific requirement in the Development Consent Order if BNG is to be afforded positive weight in planning balance.
- LCC notes that Requirement 8 of the draft Development Consent Order (REP3-004) refers to " ... *achievement of a minimum 31.66% biodiversity net gain for area-based habitat units, 20.68% biodiversity net gain for hedgerow units and 10% biodiversity net gain for watercourse units...*". These figures do not align with figures presented in the Biodiversity Net Gain report (REP3-022) or with the version of the Statutory Biodiversity Metric which the Applicant shared with LCC at Deadline 2. LCC requests that the Applicant confirms the level of BNG that will be delivered and ensures that BNG figures presented in different documents are aligned.

Chapter 16 – Cumulative Effects [REP3-015]

- LCC notes the updates made in REP3-015 relating to the proposed Navenby National Grid substation and has no comments to make in relation to ecology and biodiversity.

oCEMP (Construction Environmental Management Plan) [REP3-034]

- LCC provided comments on the previous version of the oCEMP at Deadline 3 which have not yet been addressed. LCC has no new comments to make in relation to ecology and biodiversity at this stage.

oOEMP (Operational Environmental Management Plan) [REP3-041]

- LCC provided comments on the previous version of the oOEMP at Deadline 3 which have not yet been addressed. LCC has no new comments to make in relation to ecology and biodiversity at this stage.

oDEMP (Decommissioning Environmental Management Plan) [REP3-048]

- LCC provided comments on the previous version of the oDEMP at Deadline 3 which have not yet been addressed. LCC has no new comments to make in relation to ecology and biodiversity at this stage.

oLEMP (Landscape and Ecology Management Plan) [REP3-038]

- LCC welcomes the additional justification of the Applicant's approach to farmland birds (3.1.8-3.1.12) and considers that if the stated measures are delivered, it is likely that local populations of farmland birds are likely to be at least maintained.
- LCC notes that there is a discrepancy in the BNG figures relating to hedgerows presented in Table 1 when compared to figures presented in the updated BNG Strategy (REP3-022).
- LCC welcomes the addition of reference to monitoring of sward heights at 6.1.24 and to the potential need for remedial management if required to ensure that required conditions to meet BNG commitments are achieved.
- LCC welcomes the additional details relating to the management of arable field margins at 6.1.42 - 6.1.43 and agrees with the Applicant's proposed approach.
- Comments on the establishment of an Ecological Steering Group and the proposed Terms of reference are provided in response to EXQ2 Q2.4.3.

Waste

LCC has reviewed the updated documentation submitted by the Applicant. LCC's comments on waste matters are set out below.

oCEMP (Construction Environmental Management Plan)

- 2.19 - LCC welcome the addition of this new section which commits to active engagement with other developers to manage and mitigate cumulative effects.

oOEMP (Operational Environmental Management Plan)

- 2.10 (p13) - LCC welcome the addition of this new section which commits to producing and updating a maintenance schedule. However, in the meantime the Council request that an up-to-date version is provided of the forecasts for annual waste arisings, particularly failed/replaced PV panels during the operational phase.

oDEMP (Decommissioning Environmental Management Plan)

- 2.10.6 (p16) - LCC welcome the commitment to provide 6-monthly updates on decommissioning details during the decommissioning phase, although we are still in discussion with the applicant regarding their future waste forecasts available at this stage.

Other comments

- Arisings forecasts – LCC are currently in discussion with the applicant regarding their forecasts for waste arisings tonnages at each phase of the project. We are concerned at a lack of consistency between different published forecasts, particularly in light of the absence of a clear breakdown of the assumptions made – e.g. percentage failure rate of PV panels.
- Construction waste – The oCEMP (2.10.1) suggests that there will be minimal WEEE waste but other solar NSIPs have indicated that they anticipate a certain percentage as a breakage/failure rate of PV panels.

Examining Authority's Proposed Changes to the dDCO

The Council has reviewed the schedule of proposed changes to the draft DCO and agrees with these alterations, particularly the proposed requirement in relation to the National Grid Navenby Substation Connection. This would ensure that preparation works which could include hedgerow and tree removal, cannot occur prior to the Navenby substation being granted permission and thereby providing protection from potential unnecessary damage. The Council is also pleased to see the addition of a requirement limiting the replacement of PV panels over the lifetime of the development to 5%. This requirement will limit potential waste tonnages of PV panels throughout the project's lifetime, which is particularly important when considering the cumulative effect of Solar NSIP waste which is projected for Lincolnshire. Overall annual percentage figures of waste being sent to the Council by the Applicant, will allow LCC to monitor whether the extent of replacement is likely to have materially new or different significant effects from those assessed in the ES.

Yours faithfully



For 
Head of Planning