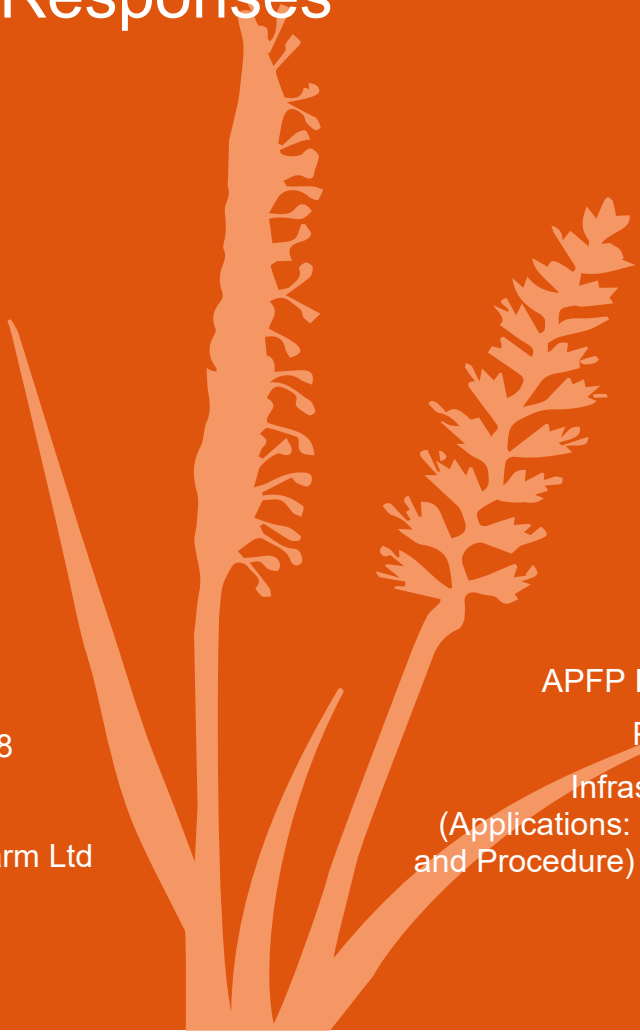
Springwell Solar Farm

Response to Deadline 4 Submissions and ExQ2 Responses



EN010149/APP/8.28
October 2025
Deadline 5
Springwell Energyfarm Ltd

APFP Regulation 5(2)(q)
Planning Act 2008
Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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1. Introduction

1.1. Purpose of the Report

1.1.1. This Report provides the Applicant's responses to the submissions and further Written Representations (WRs) received at Deadline 4 in respect of the proposed Springwell Solar Farm (the Proposed Development).

1.1.2. This document does not look to replicate the position previously iterated by the Applicant, and so signposts towards the following documents where relevant:

- **Response to Relevant Representations [EN101049/APP/8.13]** [REP1-070];
- **Response to First Written Questions (ExQ1) [EN010149/APP/8.14]** [REP1-071];
- **Response to Deadline 1 Submissions [EN010149/APP/8.20]** [REP2-023]
- **Response to Deadline 2 Submissions [EN010149/APP/8.21]** [REP3-074].
- **Response to Deadline 3 Submissions [EN010149/APP/8.25]** [REP4-048].
- **Response to Second Written Questions (ExQ2) [EN010149/APP/8.26]** [REP4-049];

1.1.3. Where topics have previously been raised at Issue-Specific Hearings, a summary of the Applicant's position can be found in:

- **Written Summary of Oral Submissions at Issue Specific Hearing 1 [EN010149/APP/8.16]** [REP1-073];
- **Written Summary of Oral Submissions at Issue Specific Hearings 2, 3 and 4 [EN010149/APP/8.22]** [REP3-075];
- **Written Summary of Oral Submissions at Compulsory Acquisition Hearing 1 [EN010149/APP/8.23]** [REP3-076]; and
- **Written Summary of Oral Submissions at Open Floor Hearing 1 [EN010149/APP/8.15]** [REP1-072].

1.2. Structure

1.2.1. This document is structured as follows:

- Section 2 provides the Applicant's response to the points raised in the post-hearing submissions and in further submissions made by Category 1 stakeholders, including signposting to other responses and application documents where appropriate;

- Section 3 provides the Applicant's responses to the points raised in the Written Representations and other submissions made at Deadline 4 by Category 3 stakeholders, grouped by theme.

1.2.2. No Category 2 stakeholders made submissions at Deadline 4.

1.3. Approach

Stakeholders

1.3.1. This Report follows the categorisation of responses used in the **Response to Relevant Representations [EN101049/APP/8.13]** [REP1-070] and other documents, as follows:

- Category 1: Statement of Common Ground parties;
- Category 2: Other Individual and Technical Stakeholders;
- Category 3: Themed Responses where similar issues have been raised by more than one Interested Party (IP).

2. Response to Category 1 Stakeholders

2.1. Overview

2.1.1. The following submissions were received by Category 1 Stakeholders at Deadline 4 for which the Applicant has provided responses:

- Lincolnshire County Council – Comments on Deadline 3 Submissions [REP4-052] and Response to ExQ2 [REP4-051];
- North Kesteven District Council - Response to ExQ2 and Comments on Deadline 3 Submissions [REP4-053];
- Environment Agency – Comments on Deadline 3 Submissions [REP4-054];
- Historic England - Responses to ExQ2 [REP4-055];
- Natural England - Responses to ExQ2 [REP4-057];
- National Grid Electricity Transmission (NGET) – Responses to ExQ2 [REP4-059].

2.1.2. The tables below provide the Applicant's responses to these topics arranged under the headings listed above, supported by identification of sub-themes for clarity and ease of reference.

2.2. Response to Comments on Deadline 4 Submissions and ExQ2 Responses from Category 1 Stakeholders

Table 1-1 – Lincolnshire County Council Response to ExQ2 [REP4-051] and Comments on Deadline 3 Submissions [REP4-052]

Summary Position	Applicant's Response
Response to ExQ2	
Q2.1.1 – Cumulative Effect 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. 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 particularly 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 (UR), 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. 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. 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:	**Landscape and Visual** The Applicant does not consider there would be any significant sequential cumulative visual effects in association with the Springwell Solar Farm. The only A-road from which the Proposed Development would be visible is the A15 and it is acknowledged in **ES Volume 1, Chapter 10: Landscape and Visual [EN010149/APP/6.1]** [APP-050] that there would be a significant visual effect on views from a length of this route as it passes through Springwell West. However the A15 does not pass through any other operational or proposed solar farms between at least Lincoln and Sleaford or indeed for some distance either side. Consequently the Applicant does not consider there to be any significant cumulative effect with other solar farms on this route. The parallel B1188 which passes close to Springwell East would experience a very brief view of Springwell Solar Farm but again no other solar farms between Lincoln and Sleaford are particularly noticeable (the scheme at Branston is just glimpsed when passing in winter months). The Applicant does not consider this would constitute a significant cumulative effect on views. Development from the A607, therefore, even in the event that there was any glimpse of other solar farms west of the Lincoln Cliff from this road there could be no cumulative effect with Springwell Solar Farm. None of the recognised long distance footpaths pass both Springwell Solar Farm and another solar farm or would have views of both. The Viking Way which runs along the top of the Lincoln Cliff may have views across the vales to the west and see multiple solar farms if they were constructed but there would be no view of Springwell Solar Farm from this route.

Summary Position	Applicant's Response
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. Paragraph 2.1.6 Need for cooperation agreements 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. 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. LCC will provide further comments at deadline 5 once it has had an opportunity to review the submitted document at deadline 4.	Therefore Springwell Solar Farm would not contribute to any cumulative visual effects on footpaths across the Lincoln Cliff. Whilst in theory, it would be possible to undertake a journey by car or along a series of interconnected footpaths from east to west passing first Springwell Solar Farm and then eventually passing over the Lincoln Cliff where there may be views of Leoda or Fosse Green DCO solar farms, linkages east to west across the Central Plateau are limited and there are no recognised walking or cycling routes which would encourage this. All of the main connections in the landscape run north to south along the Central Plateau and in the event that a visual receptor was to travel past Springwell Solar Farm and then another solar farm in the wider landscape, there would be a considerable break in the journey between views of the different schemes. **Loss of best and most versatile (BMV) agricultural land** A regional assessment of the temporary loss of BMV agricultural land from solar developments in Lincolnshire and within 1km of the Nottinghamshire boundary has been undertaken, as detailed in **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.5]** [REP4-013]. It has been estimated by Natural England that around 42% of agricultural land is of BMV quality, however, within Lincolnshire the proportion of BMV rises to approximately 71.2% which is significantly above the national average, with the area of BMV agricultural land within Lincolnshire estimated to be over 410,000 hectares. In this context, the Proposed Development alone would temporarily occupy approximately 0.13% of BMV land in Lincolnshire. In addition to the proposed other large scale solar farms identified in Table 16.12 which forms part of **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.5]** [REP4-013], it is anticipated based on the outputs of the assessment that approximately 2% of the county BMV land resource will be temporarily used. It should be noted that this is a precautionary figure, based on assumptions around BMV for those solar developments which do not have any ALC data to date, and noting that One Earth Solar Farm straddles the Nottinghamshire border, and the Great North Road Solar Park is entirely in Nottinghamshire.

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	The majority of the land for these projects across the county is considered temporary with majority of the land to be returned to agricultural use at the end of the operational phase and with land within the grid connection cable corridors to be returned to agricultural land following the construction phase. Therefore, the Applicant considers that the inter-project cumulative effects are minimal in the context of the remaining BMV available resource that is available at the regional level. **Waste** The Applicant has further assessed waste, including cumulative impacts with other solar developments in Lincolnshire and nearby Nottinghamshire, considering worst-case scenarios for PV panel failures and current regional waste capacity as presented in Appendix 3 of the **Response to Deadline 1 Submissions [EN010149/APP/8.20]** [REP2-023]. This technical note has been updated at Deadline 5 (and forms Appendix 1 to this document) to include revised waste forecasts for Springwell Solar Farm during the operational (including maintenance) phase, following further engagement with Lincolnshire County Council. The outcomes of the assessment do not change the conclusions in **ES Volume 1, Chapter 8: Climate [EN010149/APP/6.1.2]** [REP3-008]. The technical note demonstrates that under the absolute worse case assessment, cumulative waste would result in 4.01% of regional landfill capacity to be required for the other existing development and/or approved developments, under the realistic worst case 1.2% of regional landfill capacity would be required. Assuming decommissioning of the other existing development and/or approved developments occurs during a single five year period, annual waste from the cumulative schemes would equate to approximately 11.40% waste arising in the East Midlands and 28.27% C&D waste arisings in Lincolnshire and Nottinghamshire. The Applicant does not anticipate any significant cumulative effects on waste during construction, operation (including maintenance) or decommissioning as it is anticipated that private sector waste companies will develop these facilities to respond to market demands. Current solar panel waste generation is low, so there is little demand for facilities, hence the limited available capacity presently. Therefore, it is expected that facilities which reuse, recycle, or recover end of-life solar panels will be developed as the quantities of this waste stream increase. The Waste Electrical and Electronic Equipment (WEEE) Regulations place obligations on those who place solar panels on the market to finance the costs of collection,

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	treatment, recovery and environmentally sound disposal; and the landfill tax strongly incentivise reuse, recycling and recovery. Prior to the operation (including maintenance) and decommissioning phases, further details on the types of waste and waste forecast, along with details on the amount of recycled / landfill waste that is anticipated, will be included in the final OEMP and DEMP. The Applicant will also provide an annual maintenance schedule which will detail the anticipated amount of waste that would be recycled / landfilled and the intended destination / fate of each stream in line with the detail set out in Section 2.10. of the **oOEMP [EN010149/APP/7.10.4]** [REP3-039]. **Inter-relationship Report** While four projects have the potential to result in possible interrelationships, primarily due to spatial overlaps and the timing of construction. However, as demonstrated in this report, there is insufficient project data available at this time to provide any further detailed assessment. Based on the response above and cumulative impact assessment within **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.5]** [REP4-013], the Applicant's position is that, based on the currently available information, there are no likely cumulative effects. As one of the earliest projects to be developed, Springwell Solar Farm provides a strategic framework for understanding the cumulative effects in the area. While current assessments rely on limited data, the Applicant is committed to ongoing coordination with developers, statutory bodies, and stakeholders to identify and take opportunities to effectively manage cumulative impacts. This approach will support a transparent, evidence-based, and well-coordinated delivery of renewable energy infrastructure.
Q2.4.3 – Ecological Steering Group 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:	**7.2.1 Draft ToR** The Applicant agrees to this request and has amended the ToR to note that they are 'draft' at this stage with the final ToR to be agreed at the first meeting of the ESG. However, any final ToR would be substantially in accordance with those already outlined in the **oLEMP [EN10149/APP/7.9.4]** [REP4-030] and any amendments would be of a minor nature only.

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• 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 monitoring is to be within the remit of the ESG, the ToR will need to be amended to reflect this. • 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: • 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. • 7.2.6: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	**7.2.1 – Monitoring of BNG** The Applicant understands that given the level of BNG gain that is proposed to be achieved on site LCC and NKDC are required to satisfy themselves that the monitoring information provided by the Applicant, as outlined in the **oLEMP [EN10149/APP/7.9.4]** [REP4-030] is robust and fit for purpose and this monitoring would be subject to scrutiny by the ESG. The Applicant agrees to the request in the ToR for the ESG to be involved in monitoring in the context of having oversight and scrutiny of the BNG monitoring carried out by the Applicant. **7.2.1 - Addition of text regarding reasonable requests** The Applicant agrees to this request and has included the recommended text regards reasonable requests into Paragraph 7.2.1 of the **oLEMP [EN10149/APP/7.9.4]** [REP4-030] ToR. The following text has been added: *"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 – Works Nos. 1, 2, 3 and 4** Specific reference to Works 1,2,3 and 4 has been removed. **7.2.3 – ESG** The Applicant has amended the ToR with the recommendation that the ESG will be convened at least 6 months in advance of the commencement of the works, the following text has been added: *"The Applicant will establish the ESG at least 6 months prior to the submission of the first detailed LEMP(s), to help inform the development of the LEMP(s). The ESG would convene in advance of the commencement of such works and shall continue to exist until completion of the decommissioning works unless a shorter period is agreed between members of the ESG".*

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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. • 7.2.5: LCC suggests that this is amended to read " ... representatives from relevant local nature conservation organisations…"	**7.2.6 – Mistyping** The Applicant has reviewed this comment and notes that three is correct based on the text detailed above in Paragraph 7.2.4 of the **oLEMP [EN10149/APP/7.9.4]** [REP4-030] regards the ESG being quorate if 3 out of 4 members are present. **7.2.7 – Meeting frequency** The Applicant accepts this recommendation and has amended the ToR to note that the ESG would meet at least twice annually for the 10 years and then move to a single annual meeting thereafter, once the initial establishment has taken place. **7.2.8 – Reasonable costs** In response to the Councils' comments on this point, the Applicant has added an obligation to the draft section 106 agreement. **7.2.5 – Local nature conservation organisations** The Applicant has amended the ToR in line with the recommended amendment.
Q2.7.5 – Temple Bruer Heritage Impact Review 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.	The Applicant acknowledges LCC's response that the independent report does not alter their position that Temple Bruer can be scoped out of the assessment as detailed in the Applicant's response to Q2.7.5 provided in the **Response to Second Written Questions (ExQ2)** [REP4-049].
Q2.8.1 – Articles 40 and 41 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	[The Applicant wishes to note that in the ExQ2 document [PD-010] this question is referenced as Q2.8.2, but here the labelling used by LCC has been adopted.] The Applicant has considered LCC's suggestion and does not consider that a further change to section 2.10 of the **oOEMP [EN010149/APP/7.10.5]** [REP4-033] is required to specify when in the year the Applicant will provide the maintenance schedule. This is because paragraph 2.10.2 already states that the Applicant will submit the planned maintenance

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commitment to replacement planting of TPO trees, as set out in paragraph 5.3.20 of the oLEMP, is also noted and welcomed. 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. To strengthen the proposed approach, LCC recommends that Section 2.10 of the oOEMP should specify: The point in the year by which the annual maintenance schedule must be submitted to the relevant planning authority, and The minimum notice period required ahead of any planned vegetation removals. Furthermore, it remains unclear how the proposed schedule would address LCC's concerns regarding the potential impact on Biodiversity Net Gain (BNG) calculations.	schedule every 12 months from the date of financial commissioning. As the final construction and commissioning programme is not yet confirmed, this flexibility is needed so that submission of the schedule is linked to the date of final commissioning, and then there will be an obligation to do that on a yearly basis for the rest of the operational period. At that point the date of submission of the schedule each year will be known to LCC. The Applicant does not consider that any further notice of vegetation removal is required as submission of the planned maintenance schedule pursuant to paragraph 2.10 provides this notice, specifically paragraph 2.10.6 which states that as part of the maintenance schedule the Applicant will confirm any associated vegetation removal requirements. Further notice is not required in addition to that already proposed and would not be practicable in the context of the construction programme for a Nationally Significant Infrastructure Project, where it is established in many recently made Development Consent Orders for Applicants to have powers to carry out vegetation removal in order to deliver the project. The Applicant responded to LCC on its concerns in relation to the potential impact on BNG calculations in its **Written Summary of Oral Submissions at Issue Specific Hearings 2, 3 and 4 [EN010149/APP/8.22]** [REP3-075]. Requirement 8(2) of the **Draft DCO [EN010149/APP/3.1.4]** [REP4-004] places an obligation on the Applicant to deliver and maintain a minimum level of BNG throughout the operation of the authorised development. This is an ongoing obligation and the Applicant is subject to monitoring obligations under section 7.3 of the **oLEMP [EN10149/APP/7.9.4]** [REP4-030] to monitor BNG for the 30 year period and, after that, the management will fall under the general habitats management prescriptions set out in the detailed LEMP, which will include monitoring. Therefore, if any future vegetation removal were to impact the levels of BNG that are being delivered for the Proposed Development so that it went below the minimum levels committed to in Requirement 8, this would be identified as part of the ongoing monitoring and steps would be taken to ensure the minimum levels are achieved in accordance with the **Draft DCO [EN010149/APP/3.1.4]** [REP4-004].
Q2.8.4 –Requirement 3 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	Amendments to the written scheme setting out proposed phases of construction, pursuant to sub-paragraph (4) of Requirement 3 would be in accordance with Requirement 4 (Requirement for written approval), which sets out a procedure for certified documents and details approved under requirements to be amended with the approval of the relevant planning authority.

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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). 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. 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.	Requirement 4(1) confirms that plans, details or schemes approved under the requirements should be taken to include any amendments approved pursuant to Requirement 4. As a result, the requirement to comply with the phasing plan in Requirement 3(3) would include any approved amendments to such plan. The numbering of this requirement was rectified in the **Draft DCO [EN010149/APP/3.1.4]** [REP4-004] submitted at Deadline 4.
Q2.10.2 – Statement of Common Ground with Lincolnshire County Council 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.	The Applicant, in discussion with both LCC and NKDC, has updated both SoCGs to reflect the position of both Councils. Regarding the specific reference to rows 16-13 within the SoCG of NKDC, it is represented by rows 9-15 and 9-16 of **the Statement of Common Ground with LCC [EN010149/APP/8.1.3]** submitted at Deadline 5**.**

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Q2.13.5 – Public Rights of Way 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" upgraded" rather than improved. This would apply to Section 11, Para 17 or Schedule 2 and Part 1 of Schedule 6 of the draft DCO. The reason for this suggestion is that "upgraded" more closely relates to a change of public rights, whereas "improved" relates more to a change in physical surface etc.	As recorded in the Applicant's **Explanatory Memorandum [EN010149/APP/3.2.2]** [REP1-008] in relation to Article 11, the drafting of the Article is based upon Article 17 of the Sizewell C (Nuclear Generating Station) Order 2022. In Article 17 of the Sizewell Order "improved" is used in reference to the standard of public rights of way, including changing the status from footpath to bridleway. In keeping with this approach, the Applicant considers the proposed drafting is appropriate. The Applicant also notes that with the footpath in question, both its physical surface as well as its status will be improved.
Comments on Deadline 3 Submissions	
Biodiversity Net Gain 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.	The Applicant acknowledges the inconsistency and can confirm that the **Draft DCO [EN010149/APP/3.1.4]** [REP4-004] was updated at Deadline 4 to align with the figures detailed in the BNG Assessment. Following comments from NKDC received at Deadline 4, the Applicant has made some minor amendments to the Biodiversity Net Gain Assessment. The revised figures have been updated and aligned within the Biodiversity Net Gain Assessment, Outline Landscape and Ecology Management Plan and Draft DCO submitted at Deadline 5. The BNG figures are outlined below and secured in the **Draft DCO [EN010149/APP/3.1.5]** submitted at Deadline 5: • Habitat units – 27.16 % • Hedgerow units – 19.06% • Watercourse units – 13.59 %.
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).	The Applicant acknowledges the inconsistency in the figures for hedgerow BNG. **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3.3]** [REP3-021] and Table 1 in the **oLEMP [EN10149/APP/7.9.4]** [REP4-030] have been updated to be aligned at Deadline 5 to take account of the amendments to the BNG Assessment and associated figures revised at Deadline 5.

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oOEMP (Operational Environmental Management Plan) 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.	The Applicant welcomes the engagement with LCC on the forecasted waste figures and calculations. Following engagement with LCC, the Applicant has updated the waste forecasts for the annual waste arising for the failed and replace PV panels during the operational phase. These revised figures are provided in Appendix 1 to this document.
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.	The Applicant has used an estimated 0.5% breakage / failure rate of the Solar PV modules to calculate the amount of damage Solar PV module waste that is anticipated during the construction phase of the Proposed Development. This assumption is detailed within the raw calculations that have been shared and discussed with Lincolnshire County Council.
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 Applicant at Deadline 4 submitted its response to the ExA Proposed Changes to the dDCO in **Response to Examining Authority's Schedule of Proposed Changes to the Draft Development Consent Order [EN010149/APP/8.27]** [REP4-050]**.** As part of that response, the Applicant has set out why it strongly disagrees that any requirement is necessary. The Applicant has also set out a proposed requirement on a without prejudice basis. In terms of the concern from the Council that preparatory works such as hedgerow and tree removal could occur, the Applicant's without prejudice requirement has been drafted with this in mind, hence firstly in the list of permitted preliminary works it proposes could be carried out, it has listed those works as (a) to (g) of the definition of permitted preliminary works in Article 2 of the dDCO, intentionally not including (h) site clearance (including vegetation removal, demolition of existing structures or buildings) and (i) highway works (which have the potential to result in vegetation removal). Secondly, the Applicant has proposed it would be able to undertake any additional works with controls in place for such works in that they would need to be agreed by the relevant planning authority and would also need to either not have significant effects and be reversible (with vegetation removal being unlikely to meet the "reversible" criteria) or works that would not give rise to any adverse effects (which, again, it is unlikely vegetation removal could satisfy).

Table 2-2 – North Kesteven District Council – Response to ExQ2 [REP4-053]

Summary Position	Applicant's Response
Q2.4.3 – Ecological Steering Group The Council has provided a detailed response in relation to the ESG, its terms of reference, roles, and funding as a separate appended document. The Council's position remains that one of the primary functions of the ESG ought to be providing a monitoring and auditing framework of the applicant's commitments to BNG delivery, and for which they are seeking a positive weight in the planning balance through their commitments in draft Requirement 8 (namely 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). A stated purpose of the revised oLEMP [REP3-037] at paragraph 7.2.1 is 'to monitor the progress and implementation of the detailed LEMP(s), the aim of which is to achieve the biodiversity mitigation and enhancement as laid out in the oLEMP'. As we set out in our separate statement, we do not agree with the applicant's proposed funding of the ESG (the current draft of the s106 is silent on this matter) which as currently proposed would be a post-consent matter ergo with no mandatory recourse at that point for the applicant to pay the reasonable fees for the set up and operation of the ESG. This represents an unacceptable financial risk to the Council. We set out two fee proposals/estimates (i) for the operation of the ESG and (ii) for undertaking BNG monitoring. The latter will fall solely to the District Council. A key issue that remains unresolved at this time (and which the Council cannot therefore confirm common ground with the applicant) is the applicant's apparent unwillingness to accept that the monitoring of BNG carries a financial liability that is very clearly established in published guidance, is being adopted across TCPA schemes (we include an	The Applicant has agreed to the funding proposed by NKDC for the Council officers' involvement in the operation of the ESG and has amended the section 106 agreement to include an obligation on the Applicant to pay the suggested amount. The Applicant does not agree that additional funding is required to enable NKDC to undertake its own specific BNG monitoring over and above what the Applicant (with oversight and involvement from the ESG) would undertake for the following reasons: • The Applicant already has monitoring obligations (see Paragraphs 7.3.3 to 7.3.8 of the **oLEMP [EN10149/APP/7.9.4]** [REP4-030]) including oversight from the ESG (see Section 7.2.1 of the **oLEMP [EN10149/APP/7.9.4]** [REP4-030]) of which both Councils will be members. These monitoring obligations are considered appropriate and sufficient in order to ensure the delivery, management and monitoring of the BNG. • The Applicant is required to comply with the terms of the approved LEMP under the DCO requirement and failure to do so would constitute a criminal offence. • The Applicant has committed to the delivery of the BNG as a DCO requirement, breach of which would also be an offence. • As noted above, the Applicant has committed to funding the involvement of Council officers in the ESG (as requested in NKDC's submission, and which is now included in the **Section 106 Agreement [EN010149/APP/8.29]**) to support the ESG in its role generally in terms of compliance with the LEMP and more specifically with respect to oversight of the BNG monitoring that will occur. • If the Council have any concerns about the Applicant's compliance in terms of the delivery of the BNG or more specifically the terms of the approved LEMP, the Council can ask the Applicant for further information in order to be satisfied that there is no breach of a DCO requirement (the Council could do this using powers under the Planning Act 2008 or informally). The Applicant would need to provide the relevant information to satisfy the Council of its compliance, and it would cooperate with the Council in this respect, not least to avoid the possibility of enforcement action. • The Applicant does not agree with the detailed proposals submitted by NKDC for additional BNG monitoring for the above reasons. The Applicant has concerns over the use of AI and the Land App software for monitoring BNG delivery should AI be used to infer condition assessment remotely without recourse to botanical survey.

Summary Position	Applicant's Response
example of a recently completed BNG monitoring Unilateral Undertaking and Appeal Decision for a TCPA solar scheme known as Little Hale Fen) and, which critically, the Council has been able to cost in this case. As above the applicant is seeking material planning weight stemming from an exceedance (except watercourse units) of BNG minimum percentages, has prepared all associated BNG evidence in line with Natural England metric/s and Environment Act requirements yet is so far not willing to commit to monitoring obligations by way of payment of a monitoring fee. We will continue to work with the applicant on this matter once they have reviewed the fee proposal submitted under separate cover. The Council's position is that the negotiated outcome should focus on maximising the BNG monitoring fee (rather than the ESG funding) as the former will become a mandatory requirement for NSIPs and is currently a legal requirement for TCPA schemes.	• The approach taken by the Applicant is in line with (and in with respect to the provision of and financial support for the ESG, goes beyond) what has been required elsewhere for other solar DCOs. Some examples of recently consented solar DCOs are set out below, where weight was placed on the benefit from the delivery of BNG, in cases where proposals for monitoring were included in the respective Outline or Framework LEMP, and such monitoring was to be undertaken by the Applicant.

Solar DCO	BNG provision	oLEMP monitoring provisions	ESG	Additional funding
Springwell	Habitat 28%; hedgerow 22%; watercourse 13% [TBC]	Yes – to be undertaken by the Applicant with involvement and oversight from the Ecological Steering Group.	Yes.	Yes – s106 agreement proposed with funding of £130k to cover Councils' involvement in ESG.
Heckington Fen	Habitat 65% Biodiversity overall – great positive weight.	Yes – to be undertaken by the Applicant with involvement from Ecology Advisory Group (noted in the ExA's recommendation report, but not contained in the oLEMP).	Ecological Advisory Group.	S106 agreement but no funding for Ecological Advisory Group nor BNG monitoring.
Oaklands	Habitat 20%; hedgerow 10%; river units 10%	Yes – to be undertaken by the Applicant.	Nothing provided in the outline LEMP.	Unilateral undertaking – no contribution in relation to

Summary Position	Applicant's Response

	Biodiversity overall – limited positive weight.			BNG monitoring
Byers Gill	Habitat 80%; hedgerow 100% Biodiversity overall – limited positive weight.	Yes – to be undertaken by the Applicant.	Nothing provided in the outline LEMP.	No s106 agreement.
East Yorkshire	Habitat 80.42%; hedgerow 10.30%; watercourse 10.09% Positive moderate weight.	Yes – to be undertaken by the Applicant.	Nothing provided in the framework LEMP.	No s106 agreement.

Paragraph 7.2.1 does not explicitly refer to BNG monitoring in the proposed remit of the ESG. The Council notes that BNG monitoring is mentioned at paragraph 7.3.4, however, the Council considers that if BNG monitoring is to be a key function of the ESG then it should be explicitly listed as a bullet point within paragraph 7.2.1 and therefore forms part of the reasonable costs referred to in paragraph 7.2.8	As outlined in the response to LCC under Q2.4.3 above the Applicant agrees to the request for the ToR for the ESG to be involved in monitoring in the context of having oversight and scrutiny of the BNG monitoring carried out by the Applicant.
Paragraph 7.2.5 specifically names the Lincolnshire Wildlife Trust as the only named local environmental stakeholder organisation to attend the ESG. The Council recommends that LWT is replaced with 'local environmental stakeholder organisations' to provide the opportunity for a broader representation from local organisations which may include the LWT but isn't restricted to that organisation.	The Applicant has agreed to this request as outlined in the response to LCC under Q2.4.3 above.

Summary Position	Applicant's Response
Paragraph 7.2.7 restricts the meetings to an annual basis. The Council considers that in the initial 10 years after establishment of the group; the frequency should be two meetings per year (i.e. every 6 months). This is to reflect the need to respond promptly to any potential establishment problems that might arise during the initial years of establishment. It also reflects the higher frequency of monitoring proposed by the applicant as set out in paragraph 7.3.4 (ie in years 1, 2, 3, 5 and 10). From year 11 onwards, the frequency of meetings could be reduced to one meeting per year.	The Applicant has agreed to this request as outlined in the response to LCC under Q2.4.3 above.
Provision should be made that the applicant will take on board the feedback and suggestions from the group where reasonable and practicable	The Applicant has agreed to this request as outlined in the response to LCC under Q2.4.3 above.
Paragraph 7.2.8 refers to the applicant meeting the reasonable costs of attendees related to 'the attendance at meetings and reviewing supplied material', which is welcomed in principle. However, the Council considers that there could be scope for disagreement over the amount of time estimated for these activities and suggests that an indication of time requirements should be included. Discussions with the applicant on this matter have not yet delivered an acceptable outcome for the Council. A s106 Agreement is the usual route for securing such a payment however we note that the applicant disagrees with the principle of fixing payment for these activities via a s106, and this is reflected in the absence of such in the current draft. As a minimum, the Council suggests that it should reflect the following pattern: Years 1 - 10 • (two meetings a year) comprising:	The Applicant has agreed to provide this financial contribution in the **Section 106 Agreement [EN010149/APP/8.29]** in line with the NKDC submission.

Summary Position	Applicant's Response
• 1 day reading reports / meeting preparation • 1 day travelling to and attending • meetings (site-based meetings during years 1, 2, 3, 5 and 10) • 1 day delivering follow up actions • This would equate to officer time of 6 days per year (6 days in total over 10 years) • Estimated cost of £37,500 based on £100 hourly rate Years 11 onwards (one meeting a year) comprising: • 1 day reading reports / meeting preparation • 1 day travelling to and attending meetings (site based meetings during years 15, 20, 25 and 30) • 1 day delivering follow up actions • This would equate to officer time of 3 days per year (90 total over 30 years) • Estimated cost of £93,000 based on £100 hourly rate	
Biodiversity Net Gain Monitoring Fee Calculation In light of the above policy justification and following the discussions on BNG monitoring with the applicant and the submission of the updated oLEMP, the Council has revisited its proposed BNG monitoring fee estimate.	The Applicant does not agree that monitoring of BNG specifically by NKDC/LCC over and above the monitoring commitment that the Applicant has already made as outlined in the **oLEMP [EN10149/APP/7.9.4]** [REP4-030] is required. See detailed response to NKDC under Q2.4.3 above. The costs for this are therefore not accepted.
AI Mapping tool AI background mapping is required to support the overall monitoring process. Using the LandApp tool as an example (currently £1.40 per hectare; without subscription fee) across the entire DCO site boundary and then applying an assumed 5% inflation rate for each monitoring year, gives an overall estimate of £31,267.17 (as above without subscription to the service itself). This site-wide assessment is required to ensure that the overall % BNG target for the site is monitored and not just the significant gains. AI mapping then informs the 20% significant habitat selection/sampling selection.	The Applicant does not agree that monitoring of BNG specifically by NKDC over and above the monitoring commitment that the Applicant has made as outlined in the **oLEMP [EN10149/APP/7.9.4]** [REP4-030] is required. See detailed response to NKDC under Q2.4.3 above. In addition, the Applicant has concerns over NKDC's proposals to use the Land APP software, as monitoring of BNG compliance is about updating the condition assessment for each habitat polygon and ensuring its meeting the prescriptions required for the habitat condition claimed in the post development scenario within the Metric – this is carried out in the field by an ecologist and is not something that can be done remotely by AI.

Summary Position	Applicant's Response
Q2.5.1 – Ongoing emissions and generation data NKDC acknowledge that the publication of emissions/generation data has not been secured as a requirement within other solar farm DCOs within Lincolnshire. However, the Council notes that medium and large sized companies are required to report information on greenhouse gas emissions in their Directors' Reports under the Large and Medium-sized Companies and Groups (Accounts and Reports) Regulations 2008. This is referenced in the government Environmental Reporting Guidelines 2019: Environmental reporting guidelines: including Streamlined Energy and Carbon Reporting requirements - GOV.UK The provision of site-specific emissions information would be of beneficial use to the Council, other organisations and the general public to better understand the cumulative impacts and generation capacity arising from the increasing number of solar farm developments located within the District.	The requirement for medium and large companies to report annual greenhouse gas emissions under the Large and Medium-sized Companies and Groups relates solely to corporate-level disclosures in Directors' Reports. This obligation does not extend to project-specific emissions reporting, which is not a statutory requirement and has not been undertaken for any other solar DCO projects. An assessment of greenhouse gas emissions from the lifecycle of the Proposed Development during construction, operation (including maintenance) and decommissioning has been undertaken and is detailed in **ES Volume 1, Chapter 8: Climate [EN010149/APP/6.1.2]** [REP3-008].
Q2.7.5 – Temple Bruer – Heritage Impact Review The submission of the independent report makes interesting reading when considering the wider landscape setting and landholdings of the Knights Templar, in association with the Temple Bruer estate. Kinetic views of heritage assets remain of importance to the experience of heritage assets, and the reports demonstrates the solar panels impacting views towards the scheduled monument. The landholdings of the Knights Templar demonstrate a greater setting of designated heritage assets at Temple Bruer, but this setting has been subject to change. NKDC consider that the additional information should be considered and addressed by the applicant. However, the Council's position having reviewed REP3-083 is that this additional environmental information does not need lead to any change to the Council's position nor to the scope of the ES ie impacts on the Temple Bruer preceptory can remain scoped out.	The Applicant acknowledges NKDC's response that the independent report does not alter their position that Temple Bruer can be scoped out of the assessment as detailed in the Applicant's response to Q2.7.5 provided in the **Response to Second Written Questions (ExQ2) [EN010149/APP/8.26]** [REP4-049].

Summary Position	Applicant's Response
Q2.8.2 – Draft DCO Articles 40 and 41 NKDC welcomes the additional provisions made at paragraph 5.3.20 of the oLEMP for replacement tree planting and section 2.10 of the oOEMP, including a maintenance schedule. The Council requests that the replacement tree size set out in paragraph 5.3.20 of the oLEMP is increased to at least a 12-14cm containerised root stock. This is in line with the requirements set out in Appendix B paragraph 1.2 of the adopted NKDC Tree Strategy (p31).	The Applicant has updated paragraph 5.3.20 of the **oLEMP [EN10149/APP/7.9.4]** [REP4-030] submitted at Deadline 5 to align with Appendix B paragraph 1.2 of the adopted NKDC Tree Strategy.

Table 2-3 – Environment Agency – Comments on Deadline 3 Submissions [REP4-054]

Summary Position	Applicant's Response
Outline Operational Environmental Management Plan We do not welcome the amended wording to Table 6 (Land, soil and groundwater). The wording included now makes no reference to the need for the drainage system to be designed to capture firewater during a fire event at the Battery Energy Storage System (BESS). It therefore gives no certainty that firefighting water runoff will be captured during a fire event at the BESS and that highly polluting chemicals in batteries will be prevented from entering the water environment (groundwater and surface water). 2.3 With this in mind, we request the wording is revised to make reference to firewater. We suggest the following wording: The drainage system will be designed to capture water during a thermal runaway event or fire at the BESS, where it can be tested and released or, if necessary, removed by tanker and treated offsite (in consultation with the relevant consultees at the time) preventing accidental release to the surrounding environment.	The Applicant discussed this with Environment Agency prior to Deadline 4 and revised the wording in the **oOEMP [EN010149/APP/7.10.5]** [REP4-033] submitted at Deadline 4 to make reference to firewater as requested by the Environment Agency.

Table 2-4 – Historic England – Responses to ExQ2 [REP4-055]

Summary Position	Applicant's Response
ES Volume 3 Appendix 9.1 Clarity of revision of ES Volume 3 Appendix 9.1: Archaeological Desk Based Assessment and Stage 1 Setting Assessment referenced in the Statement of Common Ground	The Applicant agrees that the Statement of Common Ground references the revision of **ES Volume 3, Appendix 9.1: Archaeological Desk- Based Assessment and Stage 1 Setting Assessment [EN010149/APP/6.3.5]** [REP4-017] and [REP4-019] submitted at Deadline 4 and that the in-text links misdirects to another document. A revised Statement of Common Ground with updated hyperlinks has been submitted at Deadline 5.

Table 2-5 – Natural England – Responses to ExQ2 [REP4-057]

Summary Position	Applicant's Response
Tree Removal It is Natural England's advice that, whilst currently it is considered low risk that a bat roost will be directly affected, where impacts cannot be avoided as planned in the post-consent/construction phase, there is currently insufficient information to support an EPS Bat mitigation licence. NE would therefore advise the applicant that if trees are identified that require removal that they have an appropriate level of survey conducted on them… This is for all suitable trees to be directly and indirectly impacted by the proposed works. This is the minimum level of survey data that would be required to inform any future licence application.	**ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.3]** [REP3-012] outlines that bat activity survey work in the vicinity of areas of vegetation removal did not, based on the activity times after sunset, identify any likely roosts in close proximity to areas of vegetation removal, therefore the potential to encounter roosting bats is considered unlikely. A number of trees that may require removal have been identified from ground level assessments as being potentially suitable to support roosting bats. The approach regarding roosting bats as outlined in **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.3]** [REP3-012] and the **oLEMP [EN10149/APP/7.9.3]** [REP3-037] would be to subject all trees that require removal to a climbing and or emergence survey preconstruction, prior to any removal. If in the unlikely event that evidence of roosting bats is identified, then a licence from Natural England would be applied for and a suitable suite of mitigation measures would be agreed and delivered – likely to the provision of alternate roost resource on retained trees and woodland. This approach is standard and has been widely tested on a wide range of development projects. Natural England were consulted regarding the above approach and in an email Dated 23/10/2025 confirmed that: *There is currently insufficient information to support an EPS Bat mitigation licence, and no confirmed bat roosts have been identified during the surveys that will be directly or indirectly impacted by the proposed works. It is NEs understanding from reviewing the relevant chapters that trees that have potential to support roosting bats (identified during ground level tree assessments) will be avoided.*

Summary Position	Applicant's Response
	NE would however advise the applicant that if trees are identified that require removal that they have an appropriate level of survey conducted on them. NE would expect to see up to three tree climbing surveys where safe to do so- spread between May – September (with two being within May-August). This is for all suitable trees to be directly and indirectly impacted by the proposed works. This is the minimum level of survey data that would be required to inform any future licence application. The Applicant has therefore committed to an appropriate level of survey should any trees with bat roost potential need to be removed secured through the **oLEMP [EN10149/APP/7.9.3]** [REP3-037].

Table 2-6 – National Grid Electricity Transmission – Responses to ExQ2 [REP4-059]

Summary Position	Applicant's Response
Q2.6.5 Protective Provisions NGET do not yet consider the PPs in the dDCO [REP3 004] to be acceptable because, as set out above, the Applicant has made a number of amendments which are not yet agreed and are still in the process of being negotiated by the parties. The PPs in the dDCO [REP3 004] do not adequately protect NGET's interests. NGET attaches a version of the PPs which it would accept to this submission.	The Applicant agrees that the protective provisions are the subject of ongoing negotiation. The Applicant has included its preferred protective provisions in the draft DCO, which it considers provide adequate protection for NGET's undertaking. The Applicant is continuing discussions with NGET and anticipates reaching agreement, although this may be after the end of the Examination, in which case the Applicant will provide any updates in respect of agreement.

3. Written Representations – Category 3 Stakeholders

3.1. Overview

3.1.1. A small number of further Written Representations were received at Deadline 4. These have been grouped into the following themes:

- Ecology
- Climate

3.1.2. The tables below provide the Applicant's response to these topics arranged under the headings listed above, supported by identification of sub-themes for clarity and ease of reference.

Table 3-1: Ecology

PINS Ref.	Summary Position	Applicant's Response
REP4-061	**Bat surveys and impacts** Comments that the approach to impacts on bats has not been properly considered and that survey methodology is not sufficient.	The approach to surveying and assessing the impacts to bats has been undertaken with regard to the relevant legislation, planning policy and guidance. This is detailed in Section 7.2 of **ES Volume 1, Chapter 7: Biodiversity [EN10149/APP/6.1.3]** [REP3-012] and compliance of the Proposed Development against the relevant planning policy is detailed in **Planning Statement [EN010149/APP/7.2.2]** [AS-018]. The approach and survey methodology has also been discussed and agreed with North Kesteven District Council, Lincolnshire County Council and Natural England as detailed in **Draft Statement of Common Ground – North Kesteven District Council [EN010149/APP/8.2.2]** [REP3-059]**, Draft Statement of Common Ground – Lincolnshire County Council [EN010149/APP/8.1.2]** [REP3-057] and **Statement of Common Ground – Natural England [EN010149/APP/8.4.3]** [REP4-043].

Table 3-2: Climate

PINS Ref.	Summary Position	Applicant's Response
REP4-067	**Clean Power 2030** – queries regarding how the development will contribute to the aims of Clean Power 2030	The **Statement of Need [EN010149/APP/7.1]** [APP-135] provides evidence that solar is a key part of the UK government's plans for a future energy system because of the decarbonisation, security of supply and affordability benefits associated with its development. Appendix 1 to the **Planning Statement Addendum [EN010149/APP/8.12]** [REP1-069] describes the relevance of the government's Clean Power 2030 target to its decarbonisation plans, and explains (Para 3.1.1) that achieving Clean Power 2030 paves the way to decarbonisation of the wider economy by 2050 as the UK pursues the electrification of heat in buildings, transport and industry. Appendix 2 - Climate Technical Note of the **Response to Deadline 1 Submissions [EN010149/APP/8.20]** [REP2-023] provides additional context regarding the carbon intensity of the Proposed Development, and how it compares to that of the UK electricity grid, and, by extension, the targets set in the Clean Power 2030: Action Plan. As the methodology adopted by the Government in calculating the average UK grid electricity factors reflects "*only generator emissions in the operational phase and does not include emissions related to the fuel supply chain or maintenance activities",* the most appropriate 'like-for-like' comparison would be against the operational emissions intensity of the Proposed Development, which is 26.7 gCO_2e/kwh as detailed in **ES Volume 1, Chapter 8: Climate [EN010149/APP/6.1.2] [REP3-008]**. This is below the 50 gCO_2e/kwh stated in the Clean Power 2030: Action Plan.

Appendix 1: Waste Technical Note

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1. Waste Technical Note

1.1. Introduction

1.1.1. This technical note has been undertaken in response to the Lincolnshire County Council Local Impact Report [REP1-088] received at Deadline 1 and updated at Deadline 5 ~~and~~ following further engagement with Lincolnshire County Council in respect of the proposed Springwell Solar Farm.

1.1.2. The cumulative study applies a similar approach to Tillbridge Solar Project and Gate Burton Energy Park in considering the potential cumulative impacts on waste.

1.2. Study Area

1.2.1. For the purposes of this technical note, the East Midlands region is used as the study area for non-hazardous waste rather than just Lincolnshire or Nottinghamshire, acknowledging that waste is not always processed within the Waste Planning Authority where it is generated and may instead be managed at a regional level.

1.3. Baseline

1.3.1. The data to inform the baseline for this technical note has been derived from the Environment Agency on landfill capacity in 2023 in the East Midlands.

1.4. Future Baseline

1.4.1. There is no published data on future landfill capacity, and accurately predicting void capacity over the lifetime of the development is not feasible.

1.4.2. This study operates under the assumption that future landfill void capacity will remain comparable to current levels. Additionally, under the assumption that the Waste Planning Authority will plan and allocate sufficient landfill capacity to meet future needs, in accordance with Section 3 of the National Planning Policy for Waste.

1.5. Anticipated Construction, Operation and Decommissioning Waste Quantities

1.5.1. Waste streams expected to be generated during construction, operation and decommissioning are detailed below in **Table 1**. It should be noted that these assumptions are based on similar projects and the service life of the Proposed Development components as outlined in **Table 3.20** of **ES**

Volume 1, Chapter 3: Proposed Development Description [EN010149/APP/6.1.2] [REP1-022].

Table 1: Anticipated Quantity and Type of Construction Waste

Type of Waste	Recycle (tonnes)	Landfill (tonnes)
Construction Phase		
Damaged Solar PV modules	273	14
Concrete	300	300
Aggregate	762	762
Steel	450	0
Plastic	466	156
Cardboard/Paper	6,910	0
Wood	11,114	3,704
Operational (including maintenance) Phase (40 Years)		
Damaged Solar PV modules	1,092	~~20~~57
String Inverters (replacement)	672	35
Battery units (replacement)	45,885	2,415
BESS MVS (replacement)	10,944	576
Steel	2	0
Plastic	978	327
Cardboard/Paper	48	0
Wood	556	185
Decommissioning Phase		
Solar PV Modules	54,57~~0~~87	2,873
Inverters	224	12
Battery units	22,943	1,208
BESS MVS	5,472	288
Concrete	0	0
Steel	161,250	0

1.6. Study Assumptions

1.6.1. Two assumptions around recovery rates have been used for the purposes of this technical note to ensure a worst case assessment has been undertaken:

- A “realistic worst case” of 70% recovery rate, based on current and likely future recovery rates. Recovery is defined as reuse, recycling and recover. This is considered appropriately conservative;
- An “absolute worst case” based on the assumption that all construction and demolition (C&D) waste goes landfill. This is considered to be extremely unlikely to occur.

1.6.2. Waste estimates have been generated by using the following assumptions based on project experience and the approach taken on similar projects:

- Estimating PV module waste based on a nominal module capacity of 0.65 kW and weight of 35 kg;
- Assuming that the ratio of other waste to PV module waste for scheme is based on similar projects, 35 kg of total waste by mass comprises PV modules, and the remaining 65% is other waste.

1.6.3. For the purposes of this cumulative study, it is assumed that all schemes are decommissioned over a single five year period and that all waste is non-hazardous.

1.7. Cumulative Waste Study

1.7.1. The approach to the assessment of the inter-project cumulative effects of waste has been informed by the approaches by other solar DCOs that have been through Examination in the Lincolnshire area, including Tillbridge Solar Farm and Gate Burton Energy Park.

1.7.2. The assessment therefore considers other solar development, and a county Zone of Influence (ZoI). Given the Proposed Development’s proximity to Nottinghamshire, the ZoI comprises the county of Lincolnshire, in addition to any solar developments within 1km of the border with Nottinghamshire (to the west of the Proposed Development).

1.7.3. The cumulative solar farm developments have been derived from the Planning Inspectorate’s mapping tool and that of Lincolnshire County Council and Nottinghamshire County Council planning portals and align with the criteria outlined in **ES Volume 1, Chapter 16: Cumulative Effects [EN010149/APP/6.1.5]** [REP4-013]~~**[EN010149/APP/6.1.3]** [REP1-018]~~ in defining the short list for inter-project cumulative effects.

1.7.4. Using the study assumptions set out in Section 1.5 of this technical note, a study of the inter-project cumulative effects of waste has been undertaken. The outputs of the study are detailed below in **Table 2.**

Table 2: Cumulative Waste Study

Scheme	Size (MW)	PV panel waste (tonnes)	Other waste (tonnes)	Total waste (tonnes)
Springwell Solar Farm	800	57,4510	191,396	248,8476
Beacon Fen Energy Park	600	32,308	60,000	92,308
Fosse Green Energy	350	18,846	35,000	53,846
Heckington Fen Solar	500	26,923	50,000	76,923
Mareham Lane Solar	49.99	2,693	5,001	7,694
Leoda Solar Farm	600	32,308	60,000	92,308
Burton Gorse Plantation Solar Farm	63	3,392	6,300	9,692
Tillbridge Solar Project	500	26,923	50,000	76,923
Cottam Solar Project	600	32,308	60,000	92,308
West Burton Solar Farm	480	25,846	48,000	73,846
Mallard Pass Solar Project	350	18,846	35,000	53,846
Fiskerton West Solar	49.99	2,693	5,001	7,694
Steeple Renewables Project	450	24,231	45,000	69,231
One Earth Solar Farm	740	39,846	74,000	133,846
Great North Road Solar Park	800	43,077	80,000	123,077
Little Crow Solar Park	150	8,077	15,000	23,077
Meridian Solar Farm	750	40,385	75,000	115,385
TOTAL	7,832,92	421,779	783,302	1,225,081

Cumulative Waste at Decommissioning

Scheme	Size (MW)	PV panel waste (tonnes)	Other waste (tonnes)	Total waste (tonnes)
Cumulative Waste Annually				
Total waste from cumulative schemes		436,15049	894,694	1,330,8443
Total waste from cumulative schemes (m^3) (assuming density of 0.31 t/m^3 for PV panels and 1.6 t/m^3 for other waste		1,406,9352	559,184	1,966,1196
Waste to landfill, m^3 (realistic worst case estimate with 70% recovery)		422,0810	167,755	589,8365
Waste to landfill, m^3 (absolute worst case estimate - assuming zero recycling/recovery)		1,406,9352	559,184	1,966,1196
Springwell Waste Annually				
Total waste from Scheme (m^3) (assuming density of 0.31 t/m^3 for PV panels and 1.6 t/m^3 for other waste		185,3263	119,623	304,4995
Waste to landfill, m^3 (realistic worst case estimate with 70% recovery)		55,5987	35,887	91,4854
Waste to landfill, m^3 (absolute worst case estimate – assuming zero recycling/recovery)		185,3263	119,623	304,9495
Current Baseline				
Regional landfill capacity (m^3)[1]				48,997,443
Regional C&D waste arisings (tonnes)[2]				5,174,588

[1] Environment Agency (2023) '2023 Remaining Landfill Capacity' Available online at: https://www.data.gov.uk/dataset/237825cb-dc10-4c53-8446-1bcd35614c12/remaining-landfill-capacity1
[2] Environment Agency (2022) '2022 Waste Data Interrogator' Available online at: https://www.data.gov.uk/dataset/aa53a313-f719-4e93-a98f-1b2572bd7189/2022-waste-data-interrogator. Based on the approach used for the equivalent assessment completed during the Gate Burton Energy Park examination and Tillbridge Solar Project examination

Scheme	Size (MW)	PV panel waste (tonnes)	Other waste (tonnes)	Total waste (tonnes)
Lincs & Notts C&D waste arisings (tonnes)[3]				2,086,000
Comparison Against Current Baseline - Springwell		**PV panel waste (%)**	**Other waste (%)**	**Total waste (%)**
% of regional landfill capacity required for Scheme (realistic worst case estimate with 70% recovery)		0.11	0.07	0.18
% of regional landfill capacity required for Scheme (absolute worst case estimate)		0.38	0.24	0.62
% of regional C&D waste arisings		1.07.	0.07	1.14
% of Lincs & Notts C&D waste arisings		2.67	1.72	4.39
Comparison Against Current Baseline – Cumulative solar schemes				
% of regional landfill capacity required for Scheme (realistic worst case estimate with 70% recovery)		0.86	0.34	1.20
% of regional landfill capacity required for Scheme (absolute worst case estimate)		2.87	1.14	4.01
% of regional C&D waste arisings		8.16	3~~1~~.2~~1~~4	11.40
% of Lincs & Notts C&D waste arisings		20.23	8.04	28.27

[3] Environment Agency (2022) '2022 Waste Data Interrogator' Available online at: https://www.data.gov.uk/dataset/aa53a313-f719-4e93-a98f-1b2572bd7189/2022-waste-data-interrogator. Based on the approach used for the equivalent assessment completed during the Gate Burton Energy Park examination and Tillbridge Solar Project examination

1.8. Summary

1.8.1. The study demonstrates that under the absolute worse case assessment, cumulative impacts would result in 4.01% of regional landfill capacity to be required for the other existing development and/or approved developments, under the realistic worst case 1.2% of regional landfill capacity would be required.

1.8.2. Assuming decommissioning of the other existing development and/or approved developments occurs during a single five year period, annual waste from the cumulative schemes would equate to approximately 11.40% waste arising in the East Midlands and 28.27% C&D waste arisings in Lincolnshire and Nottinghamshire.

1.8.3. Private sector waste companies will develop these facilities to respond to market demands. Current solar panel waste generation is low, so there is little demand for facilities, hence the limited available capacity presently. Therefore, it is expected that facilities which reuse, recycle, or recover end of-life solar panels will be developed as the quantities of this waste stream increase. The Waste Electrical and Electronic Equipment (WEEE) Regulations place obligations on those who place solar panels on the market to finance the costs of collection, treatment, recovery and environmentally sound disposal; and the landfill tax strongly incentivise reuse, recycling and recovery.

1.8.4. Prior to the operation (including maintenance) and decommissioning phases, further details on the types of waste and waste forecast, along with details on the amount of recycled / landfill waste that is anticipated, will be included in the final OEMP and DEMP. These alongside the resultant location of any waste and the capacity of these waste facilities will be discussed and submitted for approval with the relevant local authority prior to the start of the operation (including maintenance) and decommissioning phases of the Proposed Development.

Appendix 2 – Response to NKDC Response to ExQ2

Table of Contents

1. Introduction

1.1. Overview

1.1.1. This Appendix provides the Applicant's responses to the BNG queries appended to NKDC's Response to ExQ2 submission [REP4-053].

1.1.2. This document does not look to answer every query in detail, but provides the Applicant's final position on BNG related matters.

1.1.3. This Appendix should be read alongside Appendix 1 of the **Response to Deadline 1 Submissions [EN010149/APP/8.20]** [REP2-023], which provides further information and the Applicant's previous responses to BNG queries from NKDC.

1.2. Response to NKDC's Response to ExQ2 [REP4-053]

Table 1-1 – Biodiversity Net Gain

Summary Position	Applicant's Response
Bird mitigation areas – arable field margins	
Paragraph 6.1.42 of the oLEMP states "A proportion of arable margins on Springwell West will be sown with a bird cover crop to provide seed for ground nesting and other bird species during the winter months, this being an important aspect of maintaining farmland bird populations." This is rather vague as a commitment and consequently it is not a good basis for agreement of the final specification post-determination. What does a "proportion" equate to? How many arable field margins will this to apply to and where? It is appreciated that it is likely to be desirable to maintain flexibility in the precise locations of the margins in any given year given arable cropping patterns will vary over time. However, sufficient clarity is needed on what is proposed so the commitment can be adequately secured.	The final proportion of arable margins will be defined within the detailed LEMP(s) at the detailed design stage.
Provision for other species	
The oLEMP still does not provide a clear commitment in relation to the numbers of bird and bat boxes to be provided. It is appreciated that the locations may need to be confirmed later when producing the final LEMPs, but it should be possibly to commit to the minimum number that will be provided across the Site.	The Applicant will agree the number and location of bat and bird boxes in consultation with the relevant local planning authority and this would be detailed in the detailed LEMP(s).
Habitat classification/ BNG baseline	
Woodlands: I cannot identify the further information that was requested to evidence that the woodlands classified as 'other woodland' types (noting also the restrictive definition of this habitat in the UKHab manual) are not instead the higher value 'lowland mixed deciduous woodland'. As specific examples of the need for this clarification: the woodland northeast of TN10 in Appendix 7.1 (habitat ID 551 of Appendix 7.14) is shown on the 1st Edition OS map and therefore is of sufficient age that it would seem best treated as seminatural woodland unless evidence is presented to demonstrate otherwise. This	On a precautionary basis, all woodland polygons within the Order Limits have been reviewed and classification updated from *other woodland* to *lowland mixed deciduous woodland* at polygons 344, 348, 357, 358, 364, 548, 550, and 551. **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3.3]** [REP3-021] and the BNG metric have been updated at Deadline 5 to reflect these updates.

Summary Position	Applicant's Response
also seems to be the case for part of the woodland denoted by habitat ID 364. Appendix 7.1 lacks robust descriptions of woodland habitats so currently the required evidence is lacking. Similarly, it is not demonstrated that the woodland at TN5 (habitat ID 344) falls within the standard UKHab definition of other woodland. This woodland would seem to be over 100 years old based on the 1900s OS map. This is also the case for the woodland with habitat ID 548.	
Hedgerows: There are discrepancies between the data presented for the important hedgerows assessment in Appendix 7.11 and the hedgerow classification provided within Appendix 7.1 as relied on for the BNG assessment. I have not reviewed all data; however I identify at least 13 hedgerows (2, 4, 6, 8, 12, 24, 39, 49, 52, 56, 57, 61 and 67) where 5 to 7 woody species were recorded from the sections of hedgerow surveyed for the important hedgerows assessment. This level of diversity indicates hedgerows likely to be classifiable as species-rich. But Appendix 7.1 classifies all of these hedgerows as 'native hedgerow' i.e. species-poor hedgerow. It would seem highly unlikely that for all these hedgerows the sampled sections (which reflects the positions of hedgerow crossings) would be species-rich whilst the wider hedgerow was species-poor. At present the only structured data provided for review is that derived from the important hedgerows survey and therefore weight needs to be placed on this survey data. Previously it was requested that further information be provided on the methods employed and the data obtained to classify the hedgerows for BNG assessment purposes. This information is yet to be provided. For the avoidance of doubt, it needs to be evidenced that: • The survey undertaken to classify hedgerows aligned with the requirements of UKHab and BNG i.e. data derived from 30m survey sections in accordance with the method described in the Defra Hedgerow Survey Handbook. • That the species list used was the full list of British native and archaeophyte woody species, including sycamore (not the reduced list of species used for Hedgerow Regulations survey).	All hedgerows within the Order Limits have been reviewed in line with **ES Volume 3, Appendix 7.11: Important Hedgerow Survey [EN010149/APP/6.3.2]** [REP3-017]. All hedgerows considered to be important with data on species per 30m section were re-classified as species-rich. Alongside this as a precautionary approach, all hedgerows without species per 30m section data, but where 5 or more species were recorded, were also considered species-rich on a precautionary basis. **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3.3]** [REP3-021] has been updated at Deadline 5 to reflect this. This comprised Line IDs 2, 4, 5, 6, 7, 8, 9, 11, 12, 14, 49, 92, 99, 112, 127, 132, 135, 144, 147, 153, 166, 167, 168, 172, 188, 192, 201, 203, 210, 217, 240, 241, 246, 311, 312, 318, 319, 323, 325, 338, 348, and 358.

Summary Position	Applicant's Response
In the absence of the above, it needs to be demonstrated that the baseline hedgerow classification is adequately precautionary.	
Other BNG matters: Phasing	
The BNG report update does not clarify how the assessment has responded to the Proposed Development being phased, or any implications/requirements arising from this. The oLEMP states (paragraph 1.3.4) "The Proposed Development is likely to be constructed in phases or parts, and it is envisaged that the detailed LEMP(s) may be prepared, approved, and implemented for individual parts or phases of the Proposed Development. As a result, there could be multiple LEMP(s) prepared in accordance with this oLEMP. Each LEMP will be produced in line with this oLEMP following grant of the DCO and approved by the local planning authority in consultation with relevant parties in advance of the date of commencement of the relevant phase or part of the Proposed Development."	The detailed LEMP(s) will detail how BNG will be secured during phasing of the Proposed Development, as secured by Requirement 8 of the **Draft DCO [EN010149/APP/3.1.4]** [REP4-004].
Delay in starting habitat creation/enhancement	
The Metric is not populated with a weighting to reflect the number of years delay in starting habitat creation and enhancement. Therefore the Metric result is based on the most optimal assumption of habitat creation/enhancement in the same year that habitats are removed for construction. If this timeline is not achieved then more land may be required as more habitat units would be needed to achieve the same % gain. It is not evidenced that the Applicant has sufficient land on-site. Therefore, it is not explained or evidenced that this is realistically achievable within Appendix 7.14. If the Applicant wishes to maintain this position, rather than applying a more precautionary weighting, then a clear commitment is needed that can be secured. To support this, the commitment should be reflected within the Metric (i.e. application of 0 years delay) and within Appendix 7.14 and the oLEMP. It is appreciated that at detailed design post-determination it may be possible to provide some habitat creation in advance of habitat loss, and the Metric can take account of this at that time. But for current purposes, clarity is needed on what the worst-case committed timeline for habitat creation and enhancement.	The BNG assessment undertaken at the detailed design stage will reflect the phasing plans to understand the implications of the delay in starting habitat creation/enhancement function, or alternatively the *habitat creation in advance* function should habitat be created or enhanced in advance of impacts.
Habitat enhancement – lowland calcareous grassland	

Summary Position	Applicant's Response
I cannot identify the further information that was requested to evidence that the proposed uplifts in distinctiveness of grassland types is realistic. This is specifically relevant to the proposed creation of lowland calcareous grassland, a priority habitat type, through enhancement of existing modified grasslands. This is a significant gain, with 202 habitat units proposed to be delivered by this method i.e. nearly 25% of the net unit change. Even then, a successful outcome (target condition) may take (based on the metric) 20 years versus 10 years if habitat creation were to be employed. Habitat creation would have greater confidence in a successful outcome (hence the much reduced timeline) given the removal of existing non-target vegetation and the improved ability to modify substrates if needed (e.g. by stripping topsoil). I am also not satisfied that the timeline for depleting nutrient levels in existing grasslands is realistic given the absence of data on current nutrient levels within soils. This is an important factor influencing likelihood of success in achieving the target habitat. To quote paragraph 5.3.6 of the oLEMP "current nitrate and phosphate levels in the soils across the Order Limits are likely to be high due to years of inorganic fertiliser application. High levels of these nutrients favour coarse grasses and leads to a less floristically diverse sward. It is not anticipated that directly sowing species rich grassland mixes into nutrient-rich soils will be effective, as grasses will outcompete wildflowers." The oLEMP indicates nutrient reduction can be completed in a single year prior to sowing, but the basis for this assumption is not evidenced. Given the above, there needs to be a high degree of confidence that lowland calcareous grassland can be delivered successfully using enhancement methods. Further detail should be provided on what is proposed and the Applicant should provide further peer-reviewed and other robust evidence to demonstrate this.	The Applicant has taken a more precautionary approach by considering this area under the creation tab, not the enhancement tab. **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3.3]** [REP3-021] has been updated to reflect this. The Applicant will undertake soil sampling post DCO and preconstruction to collect sufficient data to understand nutrient levels and the feasibility of the approach and implementation measures required will be outlined in the detailed LEMP(s) once this information is collected.
Habitat enhancement – other neutral grassland	
It is still not satisfactorily explained how 67 habitat units of 'Good' condition other neutral grassland is likely to be achieved through enhancement. This is another enhancement proposal that could take many years to achieve (15 years stated within the metric).	As above, the Applicant understands the point regarding habitat creation vs enhancement and at this time has taken a more precautionary approach by considering this area under the creation tab, not the enhancement tab. **ES Volume 3, Appendix 7.14: Biodiversity Net Gain Assessment [EN010149/APP/6.3.3]** [REP3-021] have been updated to reflect this. The

Summary Position	Applicant's Response
Firstly, it needs to be queried how the formal definition of other neutral grassland will be met without substantive removal of the existing modified grassland sward (which would represent habitat creation not enhancement), or otherwise evidence presented to demonstrate that the existing grassland sward is otherwise of favourable composition as a starting point. In order to meet the definition there would need to be at least one non-agricultural grass species present at a level consistent with Abundant within the new habitat, and rye-grass cover would need to be <30% of the sward. This is challenging requirement given modified grassland is often characterized by rye-grass and other agricultural grasses of sown origin. An enhancement approach would generally leave 50% of the sward intact so these grasses would remain at high cover at the time that the new grassland is sown. Grasses cannot be easily reduced in cover given they are not targets for selective herbicides, and a broad-spectrum herbicide would affect (remove) most of the existing sward. Secondly, irrespective of the above, for Good condition to be likely, sufficient condition criteria must be likely to be met. I can't identify enough that are reasonably certain – as reviewed below. To achieve Good condition Criterion A and F must be met plus at least three other criteria (5 in total). I am not satisfied that a condition greater than Moderate (minimum score of 3 required including Criterion A) is reasonably certain.	will undertake soil sampling post DCO to collect sufficient data to understand nutrient levels and the feasibility of the approach. A variable sward height will be achievable once species diversity increases and through management – either using livestock or a cutting regime.
Use of Fairly Poor condition for modified grassland	
I cannot identify the requested explanation for use of 'fairly poor' condition for the proposed modified grasslands. I do not understand the need for use of the fairly poor category given the criteria defined for condition assessment would either be failed or passed (there is no intermediary position). As the relevant criteria will either be met or they won't, the condition will either be 'poor' or 'moderate'? Further explanation should be provided to allow the planning authority to agree use of Fairly Poor, and as otherwise required in accordance with page 26 of The Statutory Biodiversity Metric User Guide.	The approach considered the likely variation in habitat condition of the solar areas. It is likely that *moderate* condition modified grassland can be achieved in between the arrays themselves and between the arrays and the security fence. However, given that underneath the arrays would be subject to shading, *moderate* condition may not be achieved across the entire area, so we have assumed *poor* condition underneath the panels to reflect this. The indicative calculations were run with the solar area modified grassland in *fairly poor* condition to account for this variation and in the absence to detailed design drawings as to the final layout and location of the arrays and the proportion of under panel area to non-panel area for each field. The Applicant is of the view that the above approach is pragmatic and sufficiently precautionary for the outline BNG assessment and calculations.

Summary Position	Applicant's Response
	The calculation for the solar area modified grassland will be updated following detailed design and area calculations are available. This will consider modified grassland under the panels as being in *poor* condition whilst modified grassland in between and around the panels being in *moderate* condition. The Applicant does not expect a substantial difference in units delivered by this modified grassland once further information is gathered post DCO consent.

Springwell
Solar Farm

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