

From: [REDACTED]
Sent: 10 October 2025 13:11
To: springwellsolarfarm@planninginspectorate.gov.uk.
Subject: Typographical amendments made to replace previous if possible, please. Many thanks!
Attachments: image003.emz; 2025 10 Further Comments to Springwell Inquiry.rtf

Cliff Villages Solar Action Group

Solar on roofs not farmland

Comments to the Springwell Inspectorate Deadline 5

Thanks

Thank you for your consideration to date. It has been good to see that all relevant representations are to be considered.

This is complementary to detailed submissions from Philip Heard and the Cliff Village Action Group.

1. Landscape Impact

- a) The NESO TEC Register now shows 13 projects seeking connection to the non-existent substation at Navenby. The Inspector will want to have cognisance of the whole picture in considering the cumulative impacts on the character of the landscape and all other factors. Just three of the solar applications cover almost 10,000 acres, 37 square km, bigger than the whole of Lincoln City, and that houses over 100,000 people.
- b) The need for this application is reduced and the impact increased since other applications have now been passed or progressing further. To the South, Mallard Pass and to the East, Heckington Fen both have permission. There is a live application for Beacon Fen Energy Park Ltd for 400MW of power and 600MW of battery power on just 757ha, connecting to an expanded Bicker Fen substation. To the West, Fosse Green is with the Inspectorate. A list of the area now covered could be obtained from the District Council, to include ground-mounted solar developments of less than 50MW.
- c) Lincolnshire has an agricultural foundation resulting in many isolated dwellings, hamlets and villages, set in food-producing countryside. Thus people might easily travel east-west along these routes, through miles of Solar industry, with never more than fifteen minutes break in views of the oppressive industry. There are 35,000 acres or 141 square kilometers of solar, including solar developments to the East, readily viewed from the high ground of the Cliff Villages including Navenby, includes 35,000 acres or 141 square kilometers. The alien features of glass or silicon and steel draw the eye and create a different, industrialised character to the landscape, both on the heath and looking out from the heath. Concrete and cables give it a permanence, making the ground very difficult to return to crops, should our grandchildren ever get the chance. A working lifetime is hardly “temporary”!

2. Need

The UK has around 96GW of offshore wind in 123 projects in development (Solar Power Portal) and 42.7GW of onshore wind. (Renewable UK) The UK Clean Power Plan 2030 is for 43-50 offshore wind, 27-29 GW onshore wind and 45-47GW solar, which could be acquired through rooftops, railways, motorways etc. Thus the calculated need for a total of 126GW already adequately met by wind alone, aside from our many rooftop solar developments. BESS units are more than three times what is needed.

3. Emissions

The proposed development does not meet the Government target of reduced emissions. Indeed it produces 34.1 gCO₂e per kWh above the Government's 2030 target. (Ref Current Submission from Philip Heard). What is the applicant proposing to meet this shortfall? Regarding the carbon plan, which should be available for public scrutiny, are emissions from travel to site clearly identified in the calculations for construction, replacement and maintenance and decommissioning?

4. **BESS Safety**

We cannot accept the applicants' over-optimistic accident rate and statement that no fire will spread to adjacent units. Based on the rate of BESS fires in the UK in the past five years, and the national increase in BESS proposed, we can realistically expect an increase in BESS fires to around 90 at the current rate. If the weather is hot and dry, other fires are likely to occur concurrently. How many fires can the fire service tackle concurrently, bearing in mind other parts of the country may also be suffering additional fires and extra appliances and staff from outside the area may be very difficult to obtain. What security can the applicants provide without drawing on local fire services? The thermal runaway events are sometimes explosive. How then would the applicants prevent neighbouring units from also catching fire? What back-up if a power cut is part of the cause of over-heating and the sprinklers fail? No development should be given permission until the regulations of safe distances from schools and homes are clear. We note that the Environmental statement of competence includes nobody with technical qualifications or experience in BESS design and safety.

5. **Decommissioning**

There is no clear plan for recycling of defunct panels within 40 years as they are replaced and when the site is decommissioned. It is not clear the cost is included in calculations done by the applicant. There is a risk of increased landfill with the added risks of pollution and fire. A significant bond would be needed to ensure money is available should the developer or site operator collapse. The Construction Design and Management Regulations 2015 (CDM) requires production and update of a detailed plan, including how the development will be demolished safely, including environmental safety. These responsibilities cannot be avoided.

6. **Financial Viability**

The viability of the project relies on other applications also being successful to justify the new substation, which may not get permission anyway. Thus the other companies are also relevant. We have investigated these companies seeking permission and find them to have very little capital or staff. These empty shell companies are taking responsibility for vast, speculative developments with undeveloped safety regulations, especially regarding the battery installations. Significant bonds are needed should the public purse need to step in.

7. **Highways**

The narrow lanes and junctions need to be improved to accommodate the likely increase in traffic, particularly the junction of the B1202 at Metheringham, Green Man Road and Navenby Heath Lane. All proposed solar and BESS developments are subject to the Substation being acceptable. Thus conditions are likely to be needed to ensure all other projects should be subject to the Navenby substation going ahead and the South Hykeham Relief Road being completed to support the increased traffic through the Cliff villages, including Harmston

8. **Local Economy**

The economic impact on agricultural production is also not well considered the applicant, with the only agricultural impact assessed being the impact on employment. Lincolnshire is nick-named the breadbasket of England because it has more Grade 1 land than any other area in England and has the highest economic output in agriculture. The cumulative loss of agricultural land has the potential loss of crop output could be in the region of £50 million. Added to that, is the associated impact on agricultural suppliers and the downstream food supply chain. 24% of Lincolnshire's economy is based on agriculture and its supporting industries. Every reduction in productive land, means less food

available for eating or for export. Even if it is used for energy crops, land can be returned to food the following year, if that is what is wanted, or to woodland, wetland or ponds. Locking ourselves out of our best asset for forty years, with contracts to global companies, is severely limiting to our local economy. The socio-economic impacts are clearly negative and reasonable grounds for an objection.

9. Agricultural soils

- a) The incremental loss of BMV land to large infrastructure projects intensifies pressure on remaining agricultural land to maintain food production and/or could lead to increased reliance on food imports, raising concerns about sustainability due to longer supply chains, higher carbon emissions, and food miles.
- b) Currently other ground-mounted solar industrial units of 1MW and above which are operational, under construction, granted planning permission and/or approved at appeal, through planning, cover 1,584ha of BMV land in Lincolnshire, in addition to the circa 3,550ha of BMV land covered by proposed or granted NSIP solar developments. The County Council is of the view that the applicant's assessment underestimates the amount of BMV land affected by solar development in Lincolnshire and as such do not agree with applicant's calculations in this respect. It is concluded that should development go ahead, there would be a significant loss of the best classifications of agricultural land, with a significant loss of economic and other benefits. In light of other projects in the wider District and County, it is also potentially cumulatively significant. This loss of BMV land is considered to be a negative and is contrary



Yours sincerely,

Kind Regards,

[Redacted]
[Redacted]
Councillor [Redacted] BE

Council of European Municipalities and Regions CEMR
Spokesperson on Climate and Energy
Independent Councillor Lincolnshire County Council
and North Kesteven District Council
Leader of the Lincolnshire Independents and the Independent Network
Vice Chairman of the Local Government Association to July 2025
www.lincolnshireindependents.org

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- c) This is reasonable grounds for objection, linked with the fact there is no sequential test applied and no alternative sites properly considered.

10. Sequential test

The Sequential Test has not included all options but focussed instead on a willing landowner. Sites not available through voluntary commercial agreements, but that might be acquired via compulsory purchase have been omitted. The wider search area above the 10km radius from the proposed substation at Navenby do not appear to have been considered. The applicant's methodology also excludes sites that are not considered to be continuous as increased cost would be likely and would impact viability. There are several other NSIP scale solar projects in Lincolnshire,

some of which have had a DCO granted or are currently in examination that are non-continuous, such as Cottam, West Burton, One Earth and Springwell. The applicant's assertion that the site must be continuous for viability is therefore questioned. As such there is considered to be insufficient information/evidence provided in the Springwell application to properly assert that the sequential test has been passed with regard to site selection. Without evidence that the sequential and exception tests have been appropriately applied, the application should be refused.

Cllr [REDACTED] **MBE** Chair of the Cliff Villages Solar Action Group

Council of European Municipalities and Regions CEMR

Spokesperson on Climate and Energy

Independent Councillor Lincolnshire County Council

and North Kesteven District Council

Leader of the Lincolnshire Independents and the Independent Network

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