



Fosse Green Energy

EN010154

7.11 Potential Main Issues for Examination

Planning Act 2008 (as amended)

Regulation 5(2)(q)

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended)

18 July 2025

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Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulation 2009 (as amended)

Fosse Green Energy

Development Consent Order 202[]

7.11 Potential Main Issues for Examination

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1. Introduction

1.1 Introduction

- 1.1.1 This Potential Main Issues for Examination (PMIE) document has been prepared on behalf of Fosse Green Energy Limited (the Applicant) in relation to an application for a Development Consent Order (DCO) for Fosse Green Energy (the Proposed Development). The DCO application is submitted to the Planning Inspectorate, with the decision whether to grant consent being made by the Secretary of State for Energy Security and Net Zero (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008) [Ref 1].
- 1.1.2 The Proposed Development comprises the construction, operation (including maintenance), and decommissioning of a ground-mounted solar photovoltaic (PV) electricity generating station with access provision, battery storage, Onsite Substation, underground cabling and associated infrastructure to generate and export and import electricity; and areas of landscaping and biodiversity enhancement. The Proposed Development will export and import electricity via the national electricity transmission network.
- 1.1.3 The Proposed Development also includes a 400 kV underground Cable Corridor of approximately 10km in length connecting the Onsite Substation and the proposed National Grid substation near Navenby. The proposed National Grid substation near Navenby is subject to a separate application and does not form part of the Proposed Development. A full description of the Proposed Development is included in **Chapter 3: The Proposed Development** of the Environmental Statement (ES) [EN010154/APP/6.1].
- 1.1.4 The Proposed Development is classified as a Nationally Significant Infrastructure Project (NSIP) under s14(1)(a), s15(1) and s15(2) of the Planning Act 2008 (as amended) [Ref 1], as it consists of the construction of an onshore generating station in England exceeding 50 megawatts (MW), and requires an application for a DCO under the PA 2008.

1.2 Purpose of this Document

- 1.2.1 In May 2024 (Updated September 2024), the Planning Inspectorate published the Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus [Ref 2]. This advice sets out that the Applicant should produce and maintain an issues tracker during the pre-application period, which informs a document setting out the potential main issues for examination, which is submitted as part of the DCO application. The PMIE, in turn, will inform the production of Statements of Common Ground (SoCG) that the Applicant will prepare in the pre-examination period, should the DCO application be accepted by the Planning Inspectorate for Examination.

1.2.2 The purpose of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience. The PMIE, is separate from the Initial Assessment of Principal Issues (IAPI) identified by the Examining Authority (ExA) during examination, however it may influence the content of the IAPI.

1.2.3 The potential main issues are elements of the Proposed Development that are not fully agreed with certain statutory bodies or local authorities (the key stakeholders), i.e. those matters with a RAG rating of amber or red. These have been informed by issues set out in the Pre-application Issues Tracker.

1.2.4 The RAG rating is as follows:

- Red** – High risk - unlikely to be resolved before the close of examination stage.
- Amber** – Medium risk - likely to be resolved before the close of examination stage.
- Green** – Low risk - highly likely to be resolved before the close of examination stage.

1.2.5 These issues have been identified through a review of responses to the Applicant's statutory consultation, meetings and correspondence with key stakeholders. The Applicant has engaged with these stakeholders throughout the preparation of the DCO application and will continue to do so during the Examination stage via the SoCGs in order to resolve the remaining issues.

1.2.6 The Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus [Ref 2], states that "*The PMIE should be a short document which, where possible, is agreed by relevant statutory bodies and local authorities*". **Table 1-1** below sets out the stakeholders consulted on the PMIE, the date they were consulted and the date they responded. The letters sent to the Stakeholders can be found at **Appendix B** of this document.

Table 1-1 Consultation on Potential Main Issues for Examination

Stakeholder	Date Consulted	Date Responded
Anglian Water	20 June 2025	01 July 2025
Environment Agency	20 June 2025	02 July 2025
Historic England	20 June 2025	08 July 2025
Lincolnshire County Council	25 June 2025	10 July 2025
Lincolnshire Wildlife Trust	20 June 2025	01 July 2025
National Highways	20 June 2025	04 July 2025
Natural England	20 June 2025	No response received.

Stakeholder	Date Consulted	Date Responded
National Grid Electricity Transmission	20 June 2025	No response received.
North Kesteven District Council	24 June 2025	26 June 2025

1.2.7 This PMIE document is structured as follows:

- a. Chapter 1: Introduction – sets out the purpose of the PMIE and the key stakeholders consulted.
- b. Chapter 2: Summary of Potential Main Issues for Examination – provides a summary of the red and amber rated issues for each key stakeholder.
- c. Appendix A sets out all issues contained on the pre-application issues tracker for each key stakeholder, along with a RAG rating, and responses from each key stakeholder, if one was provided.
- d. Appendix B provides copies of the PMIE letters sent to key stakeholders.

2. Summary of Potential Main Issues For Examination

2.1.1 This section provides a summary of the PMIE with each stakeholder. Appendix A of this document includes a full summary of issues identified. **Table 2-1** set out the issues per stakeholder which are RAG rated as red or amber. These issues could potentially comprise main issues for examination.

2.1.2 For more detailed information, refer to Appendix A of this document.

Table 2-1 Summary of Potential Main Issues for Examination

Stakeholder	Ref	RAG	Summary of Potential Main Issues for Examination
Anglian Water	Water Environment		
	WE2		Impact of the Proposed Development both alone and cumulatively on Anglian Water's assets, in particular Swinderby Water Recycling Centre, and any need for mitigation as a result.
	WE3		Design of the Proposed Development to minimise interaction with Anglian Water assets, critical infrastructure, sewer and flood easements and land ownership and the need to avoid diversions which have associated carbon costs.
	WE4		The potential requirement for potable and raw water supplies.
	WE5		The potential requirement for water recycling (surface water and foul drainage) connections.
	WE6		Confirmation of the Proposed Development's cumulative impacts with Anglian Water projects.
	WE8		Consideration of water supply in the Environmental Statement.

Stakeholder	Ref	RAG	Summary of Potential Main Issues for Examination
Environment Agency (EA)	Water Environment		
	WE10		The requirement for further flood risk and ecological information in relation to main rivers within or adjacent to the Proposed Development to demonstrate there would not be any issues that would prevent the granting of a Flood Risk Activity Permit.
	WE12		Trenchless crossing techniques should be prioritised, to minimise impacts on fish habitat.
	WE16		Impact of the Proposed Development on water supply and consumption.
	Additional Issue Raised		
	EA ADD1		Flood risk from the Proposed Development, in relation to the Witham Washlands Flood Storage Area.
	n/a	n/a	There are no red or amber RAG rated issues with Historic England.
Lincolnshire County Council (LCC)	The Project		
	TP2		Impact to the Proposed Development as a result of delay or cancellation of the proposed National Grid substation near Navenby.
	TP3		Whether the 60 year lifespan of the Proposed Development is considered permanent rather than temporary.
	TP4		Mechanisms to ensure grazing can take place, and the production of a Grazing Management Plan.
	Alternatives		
	ALT1		The assessment of alternatives in relation to the proposed National Grid substation near Navenby.
	Cultural Heritage		

Stakeholder	Ref	RAG	Summary of Potential Main Issues for Examination
	CH3		Consideration for grazing animals, other than sheep.
	CH4		The cumulative impacts beyond 1-3km of the Proposed Development boundary.
	CH5		The specific threshold distance for the inclusion of non-designated assets.
	CH6		Consideration of group value approach in cumulative assessment for heritage, particularly for non-designated assets such as historic farmsteads.
	CH7		Consideration of mitigation to address the transition from a rural setting to a semi-industrial solar landscape.
	CH8		Extent of archaeological evaluation.
	CH9		Archaeological significance beneath the A46.
	CH10		The use of concrete blocks as an alternative to piling.
	CH11		References to archaeology in the non-technical summary.
	CH12		Mitigation measures in the Framework Construction Environmental Management Plan.
	CH15		Mitigation measures and the summary of residual effects.
Socio-Economics and Land Use			
	SE6		The study areas for above-ground non-designated heritage assets and designated assets.
Other Environmental Topics			
	OT7		The Agricultural Land Classification assessment should include the grid connection corridor.

Stakeholder	Ref	RAG	Summary of Potential Main Issues for Examination
Lincolnshire Wildlife Trust (LWT)	Ecology		
	E3	Red	Biodiversity units should not be sold on to other development projects and should remain within the Proposed Development contributing to the 'additionality' pillar of the Biodiversity Net Gain framework.
National Highways	Traffic and Transport		
	TT2	Yellow	The potential interaction of the cable route with the A46, which forms part of the Strategic Road Network.
	TT3	Yellow	Data in the 2032 base year traffic model.
Natural England (NE)	Socio-Economics and Land Use		
	SE1	Red	Recommendation that an Agricultural Land Classification (ALC) survey is undertaken of the entire site boundary, including the Cable Corridor.
National Grid Electricity Transmission	n/a	n/a	There are no red or amber RAG rated issues with NGET.
North Kesteven District Council (NKDC)	The Project		
	TP7	Yellow	The 60 year operational life of the Proposed Development.
	Cultural Heritage		
	CL1	Yellow	Impact of the Proposed Development on climate change due to panel replacement.
	CL2	Yellow	The use of the latest carbon factors in the Environmental Statement
	CH16	Yellow	The approach to assets of 'highest value'.
	CH17	Yellow	Further engagement with the NKDC Conservation Officer.

Stakeholder	Ref	RAG	Summary of Potential Main Issues for Examination
	CH18		The Study Area for the cultural heritage assessment.
	CH19		Reliance on embedded mitigation to cover any eventuality.
Socio-Economics and Land Use			
	SE9		NKDC require the need to ensure Soil Management Plans remain robust for 60 year life span.
	SE10		Further information is required on the economic impact of the Proposed Development.
	SE12		The impact of the Proposed Development during construction on the availability of serviced accommodation.
	SE13		The economic benefits of the Proposed Development, in relation to Gross Value Added.
Other Environmental Topics			
	OT4		Further information is required on waste management, particularly regarding waste battery storage and the recycling of solar panels.
	OT10		The mechanisms for the successful implementation of planting.
Cumulatives			
	CU4		The need to assess the proposed National Grid substation near Navenby when information is available in the ES.
Design			
	DS1		The management of the community orchard proposed as part of the Proposed Development.
	DS3		The proximity of Solar Stations in relation to Public Rights of Way.

3. References

Ref 1 HM Government (2008). Planning Act 2008. Available at: <https://www.legislation.gov.uk/ukpga/2008/29/contents> [Accessed 04 April 2025]

Ref 2 Planning Inspectorate (2025). Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus. Available at: [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](#) [Accessed 22 May 2025]

Appendix A Status of Issues

A.1.1 Table 3-1 below includes the issues firstly identified by the Applicant, as well as any changes/additions made by the stakeholders following engagement on the potential main issues for examination, detailed in Table 1-1. Where stakeholders have responded with additional issues, these have been added to the table and referenced using the following references based on the consultee, such as 'EAADD1'. The RAG rating has been updated based on the responses provided by the stakeholders. The table has been prepared in accordance with the template provided by the Planning Inspectorate on their guidance page: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus (May 2024, updated September 2024) [Ref 2].

Table 3-1 Status of Issues with for Anglian Water

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Anglian Water Response	Updates to RAG rating
WE2	Impact of development on Anglian Water's assets and need for mitigation. Noting the Swinderby Water Recycling Centre (proposed upgrade and expansion to commence in 2028) needs to be considered as part of cumulative assessment.	Chapter 15: Cumulative Effects and Interactions of the ES [EN010154/APP/6.1]	 	All cumulative developments within the Zone of Influence have been accounted for in the Cumulative effects assessment, which will be presented in Chapter 15: Cumulative Effects and Interactions of the ES [EN010154/APP/6.1] , where there is an active planning application for the development. There is currently no active planning application for the Swinderby Water Treatment Works. This was discussed during a meeting held with Anglian Water on 29 April 2025 and was confirmed to be an acceptable approach.	Anglian Water request further discussions on this aspect. The Swinderby Water Recycling Centre has been identified as a AMP8 build scheme. An EIA screening opinion is being undertaken and then (if no EIA is required), a planning application would need to be submitted to the local planning authority for any aspects which are not deemed 'permitted development'. i.e. any new buildings that are above 29m3 for example. The construction stage of the project is currently programmed for 2025/2026, therefore the cumulative impact should still be considered as this would comprise a project for upgrade and expansion of the works in the short term.	The RAG rating for this issue was previously green. However, has been updated to amber in response to Anglian Water's comments.
WE3	Design of project to minimise interaction with Anglian Water assets/critical infrastructure/sewer and flood easements and land ownership and specifically to avoid the need for diversions which have associated carbon costs.	N/A	 	This matter is currently under discussion with Anglian Water - Anglian Water has confirmed asset interactions and discussions are underway regarding carrying out a more detailed asset interaction search. Given the spatial flexibility built into the DCO application the Applicant is comfortable carrying out a detailed asset interaction search post consent, ahead of detailed design.	To clarify, Anglian Water has offered to carry out an asset clash detection and technical assurance assessment for the area within (or in close proximity) of the Order Limits to accurately help to identify such interfaces and any diversions that will be necessary. However, this matter is not subject to any further discussions at present as the Applicant has decided not to pursue this at this stage. It is Anglian Water's view that undertaking this assessment would assist to de-risk the delivery and timescales for the project.	No change has been made to this RAG rating.
WE4	Requirement for potable and raw water supplies (if any).	Chapter 9: Water Environment of the ES [EN010154/APP/6.1]	 	A Water Resources Assessment (WRA) has been provided to Anglian Water, and they have confirmed they are able to supply the water required for construction and operation of the Proposed Development.	To clarify, a completed WRA form was submitted to Anglian Water. Anglian Water have confirmed that following an initial assessment for a supply of water (both domestic and non-domestic) during construction and during operation, which is higher rate than we are	The RAG rating for this issue was previously green. However, has been updated to amber in

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Anglian Water Response	Updates to RAG rating
					<p>normally able to provide i.e. 20m³/d, the rate of water can be supported within a Water Resource Zone.</p> <p>However, no local network capacity assessment has been carried out and the Applicant has been advised to submit a pre-planning enquiry (PPE) prior to any DCO approval.</p>	response to Anglian Water's comments.
WE5	Requirement for water recycling (surface water and foul drainage) connections (if any).	Chapter 9: Water Environment of the ES [EN010154/APP/6.1]		<p>A WRA has been provided to Anglian Water, and they have confirmed they are able to supply the water required for construction and operation of the Proposed Development.</p>	<p>Please note the WRA form only covers water supply and any requirement for water recycling connections have been assessed as a result. A PPE would be necessary to provide further advice and any confirmation regarding water recycling connections.</p> <p>Anglian Water is responsible for management of the risks of flooding from surface water which are directed to foul water or combined water sewer systems. Our advice on surface water management is available here: aws-surface-water-guide-sm.pdf</p> <p>Potential embedded design measures should include Sustainable Drainage Systems (SuDS) to be utilised at permanent above ground installations to manage rainfall run-off and achieve sufficient attenuation to avoid increases in flood risk, and compensation flood storage at temporary site compounds to manage flood risk at these locations.</p> <p>Anglian Water will not accommodate any surface water run-off into a foul sewer, and only to a combined sewer in exceptional circumstances. Our preference would be for surface water run-off from above ground permanent buildings and impermeable surfacing to be managed by SuDS with any outfall to a watercourse, in accordance with the drainage hierarchy. The FRA should consider any increased risk of surface water and groundwater flood risks arising from the scheme that could exacerbate sewer flooding risks due to infiltration/ingress to our networks. The likelihood of more extreme weather events leading to higher-than-average rainfall and cumulative impacts of storm events, as recently experienced during Winter</p>	The RAG rating for this issue was previously green. However, has been updated to amber in response to Anglian Water's comments.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Anglian Water Response	Updates to RAG rating
			Yellow		<p>2023/24, mean that infrastructure becomes increasingly vulnerable to flood risk. The project should aim to minimise any flood risks as far as possible by designing in measures to limit increased flood risks to utilities infrastructure.</p> <p>Flooding from other sources should include reference to Anglian Water infrastructure and further detail provided regarding potential temporary effects on flood risk from third party infrastructure works during construction of the Project should be provided in the FRA, given the interfaces between the Project and Anglian Water assets. These interfaces will also be managed through the Protective Provisions and agreed construction practices.</p> <p>Subject to confirmation that all surface water will be managed following the drainage hierarchy, including Sustainable Drainage Systems (SuDS), Anglian Water would want to clarify that the DCO as proposed will have no connection to the public sewer network for construction or for operations. This would then negate the need for the Draft Development Consent Order to provide for any connection and so require consequent Protective Provisions and Requirements to ensure any connections did not compromise the wastewater services of existing customers.</p> <p>We consider that SuDS and the potential for rainwater harvesting to serve any non-potable water requirements, should be used. Notwithstanding the lead roles of the Lead Local Flood Authority, the Environment Agency and the Internal Drainage Boards, Anglian Water would welcome clarification on how resultant impacts on the local drainage/ sewerage network will be designed as part of the scheme.</p> <p>Anglian Water will be a consultee set out in Requirements for the approval of drainage strategies and surface water management plans. We would encourage any pre-planning enquiries are made</p>	

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Anglian Water Response	Updates to RAG rating
			Yellow		through our InFlow platform to ensure the most appropriate solution is taken forward.	
WE6	Confirmation of the project's cumulative impacts with Anglian Water projects.	Chapter 15: Cumulative Effects and Interactions of the ES [EN010154/APP/6.1]	Yellow	All cumulative developments within the Zone of Influence have been accounted for in the Cumulative effects assessment (to be presented in Chapter 15: Cumulative Effects and Interactions of the ES [EN010154/APP/6.1] where there is an active planning application for the development. There is currently no active planning application for the Swinderby Water Treatment Works. This was discussed during a meeting held on 29 April 2025 with Anglian Water.	See under Ref WE2. This needs to be kept under review given the short-term delivery timescales for this project.	The RAG rating for this issue was previously green. However, has been updated to amber in response to Anglian Water's comments.
WE7	Draft Protective Provisions	Draft Development Consent Order [EN010154/APP/3.1]	Green	The Applicant is currently in discussions with Anglian Water regarding the protective provisions.	Agree, discussions on the draft Bespoke Protective Provisions are currently taking place.	No change has been made to this RAG rating.
WE8	Disagreement that water supply can be scoped out of the Environmental Statement: - Water Resources Assessment required in Environmental Statement - GHG associated with transporting water by tanker rather than using mains supply. Water supply for cleaning purposes should be assessed using a Water Resources Assessment.	Chapter 9: Water Environment of the ES [EN010154/APP/6.1]	Yellow	Water Supply has been scoped into the ES assessment and is presented within Chapter 9: Water Environment of the ES [EN010154/APP/6.1]. A Water Resources Assessment has been submitted to Anglian Water and Anglian Water confirmed it is able to supply the water required during operation and construction of the Proposed Development.	See above under Ref. WE4. Anglian Water has only at this stage confirmed the rate of water acceptance. A summary of the WRA should be included in the ES.	The RAG rating for this issue was previously green. However, has been updated to amber in response to Anglian Water's comments.
NV1	Consideration to be given to vibration affecting underground services.	Framework Construction Environmental Management Plan [EN010154/APP/7.7]	Green	An assessment of construction vibration on residential receptors is presented within Chapter 11: Noise and Vibration of the ES [EN010154/APP/6.1]. As set out in that chapter, the potential impact upon underground services was scoped out on the basis that a commitment has been made within the Framework Construction Environmental Management Plan [EN010154/APP/7.7] (which will be submitted with the DCO application) to undertake a risk assessment of potential damage	Noted. We will review the Framework Construction Environmental Management Plan due to be submitted with the DCO application and provide feedback through Relevant Representations.	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Anglian Water Response	Updates to RAG rating
				to underground services due to construction induced vibration which could arise as a result of driven piling or Horizontal Directional Drilling (HDD), being the only mechanisms that could potentially damage underground services due to construction vibration.		

Table 3-2 Potential Main Issues for Examination for Environment Agency

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Environment Agency Response	Updates to RAG rating
WE9	Concerns regarding assessment of flood risk impacts. Design changes and mitigation is recommended to ensure flood risk is not increased on or off site.	Flood Risk Assessment, Appendix 9-C of the ES [EN010154/APP/6.3]	Green	The Flood Risk Assessment (presented in Appendix 9-C of the Environmental Statement (ES) [EN010154/APP/6.3]) to be submitted with the DCO application has been prepared in accordance with feedback received by the Environment Agency, and consultation has been undertaken throughout the preparation of the document.	<p>We agree with the status of issue WE9.</p> <p>We have reviewed the draft Flood Risk Assessment (FRA) and have provided comments which should be considered within an updated assessment. Prior engagement with the Applicant in relation to the consideration of climate change and quantifying the impact of solar panel support frames on flood risk has been positive and the Applicant has presented the information we would expect in this regard. The flood mitigation measures proposed have been generally acceptable. We look forward to reviewing the final FRA.</p>	No change has been made to this RAG rating.
WE10	Further information required in relation to main rivers within/adjacent to the Site in relation to flood risk and ecology to demonstrate no issues which would prevent granting of a Flood Risk Activity Permit.	Chapter 9: Water Environment of the ES [EN010154/APP/6.1]	Yellow	Resolved. The design and construction methodology for the cable routes under main rivers/flood defences has been discussed and detailed during the meeting held with the Environment Agency on 6 March 2025. The need for a Flood Risk Activity Permit has been disapproved under the Draft Development Consent Order, with matters relating to flood risk to be agreed by way of protective provisions for the benefit of the EA in the Draft Development Consent Order.	<p>We disagree with the status of issue WE10 and do not consider this issue resolved as no formal request has been made to disapply Flood Risk Activity Permits (FRAPs) have been made. Moreover, no discussions have taken place in this regard. The disapplication of a FRAP requires our consent.</p> <p>We would not agree to the inclusion of protective provisions for our benefit in the draft Development Consent Order (dDCO) where we have not granted our consent for the disapplication of a FRAP. We have standard protective provisions which we would request to be included in the dDCO.</p> <p>Additionally, the Local Planning Authority would need to be satisfied with the disapplication of FRAPs as they would be the enforcement authority on this matter.</p> <p>We would be happy to begin discussions with the Applicant on this topic. We would initially require a full list of proposed flood risk activities and their locations in order to establish the principle and suitability of disapplication</p>	The RAG rating for this issue was previously green. However, has been updated to amber in response to the EA's comments.
WE11	Culverting - strongly advise against culverting	Framework Construction Environmental	Green	No new culverts are anticipated to be required as part of the Proposed Development.	We agree with the status of issue WE11.	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Environment Agency Response	Updates to RAG rating
		Management Plan [EN010154/APP/7.7]	Green	<p>One culvert extension is proposed based on the illustrative layout, and the feedback received during consultation with the EA has been considered and appropriate measures included within the Framework Construction Environmental Management Plan [EN010154/APP/7.7], to be submitted as part of the DCO application.</p>	<p>It is positive that the Applicant is not proposing new culverts, however we would recommend giving consideration to enhancing in-channel watercourse habitat to mitigate for the construction of the new culvert extension. Where culverts are to be extended, it should be ensured that channel bed/banks are not overly impacted by the works and that they will be reinstated following construction. Our preference would be for any culvert extensions to be open span/3-sided/portal type, as opposed to box/pipe. Please note that culverts do not need to be extended using the same format as that already in place. If, upon inspection prior to build the existing culvert is found to be in poor condition, consideration should be given to replacing the existing culvert with an open-span crossing, or aforementioned portal/arch/3-sided culvert.</p>	
WE12	Impacts on fish - further mitigation required	Framework Construction Environmental Management Plan [EN010154/APP/7.7]	Yellow	<p>This matter was discussed at a meeting held on 6 March 2025 where further information was provided. It was confirmed that where any over-pumping or water drain down is required, fish rescues will be included in the mitigation requirements in Chapter 8: Ecology and Nature Conservation of the ES [EN010154/APP/6.1] and the Framework Construction Environmental Management Plan [EN010154/APP/7.7], to be submitted as part of the DCO application. Works would be carried out under an FR2 permit application for authorisation to use fishing instruments other than a rod and line (under S27A of the Salmon and Freshwater Fisheries Act 1975).</p>	<p>We disagree with the status of issue WE12 and propose that the RAG status should be amber rather than green. Our rationale for this decision is outlined below.</p> <p>While we support the mitigation measures proposed for open-cut crossings, in locations where fish habitat is present or baseline surveys indicate fish populations, trenchless crossing techniques should be prioritised. This approach aligns with the mitigation hierarchy, where avoidance is the preferred initial step.</p> <p>We expect the ES to include a detailed crossing schedule which identifies all locations where open-cut methods are proposed, along with corresponding habitat type descriptions.</p>	<p>The RAG rating for this issue was previously green. However, has been updated to amber in response to the EA's comments.</p>
WE13	Enhancement of watercourses with regards to riparian habitat for water vole, otter, water-dependent habitats and geomorphology. Concern of lack of ambition.	Biodiversity Net Gain Report [EN010154/APP/7.12]	Green	<p>Where there are watercourses within the site the proposal is to enhance these by a minimum of 10%. The Biodiversity Net Gain assessment will explore enhancement options for watercourses on site. This could include, but is not limited to, daylighting of existing culverts, fencing off and reducing management within the riparian zone, or in-channel restoration measures.</p>	<p>We agree with the status of issue WE13.</p> <p>It is positive to read that the Applicant intends to provide a minimum of 10% Biodiversity Net Gain to watercourses. It would be useful if the Applicant provided details of the enhancement options within the dDCO.</p>	<p>No change has been made to this RAG rating.</p>

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Environment Agency Response	Updates to RAG rating
WE14	Further consideration regarding assessment of contaminated land in relation to the risk to controlled waters.	Framework Construction Environmental Management Plan [EN010154/APP/7.7]		<p>A Phase 1 Preliminary Risk Assessment has been undertaken and is presented within Appendix 14-C of the ES [EN010154/APP/6.3]. The PRA uses the source-pathway-receptor model to present a qualitative PRA of potential land contamination risks to human (chronic), environmental, and controlled water receptors from contamination sources on, or in the vicinity of, the DCO Site.</p> <p>Prior to the commencement of construction works, a targeted scheme of Ground Investigation and testing followed by a Quantitative Risk Assessment will be completed. This will be in accordance, if and where necessary, with CLR11 Model Procedures for the Management of Contaminated Land, BS10175:2011+ A2:2017 Investigation of Potentially Contaminated Sites: Code of Practice and the Environment Agency's GPLC1 Guiding Principles for Land Contamination in Assessing Risks to Controlled Waters and to support the detailed design. .</p>	<p>We agree with the status of issue WE14. We agree with the process outlined and look forward to reviewing the results of these assessments in due course. Please note, if the Phase 1 PRA is the same report as that submitted with the PEIR (Appendix 14-B), the Applicant should refer to our comments submitted previously. If it is an update to the same report, it would be helpful if any changes are clearly marked.</p> <p>Please note that CLR11 and GPLC1 have both been withdrawn and are not current guidance. We strongly recommend that the applicant instead refers to our Land contamination risk management (LCRM) pages on GOV.UK.</p>	No change has been made to this RAG rating.
WE15	Additional information required to ensure the protection of groundwater.	Framework Construction Environmental Management Plan [EN010154/APP/7.7]		<p>The recommendations regarding no fuel storage, refuelling, or vehicle washing in Source Protection Zone 3 or the Principal aquifer unless essential are noted, as well as fully bunding fuel storage in these locations. The Framework Construction Environmental Management Plan [EN010154/APP/7.7], to be submitted with the DCO application, has been updated to include these points.</p>	<p>We agree with the status of issue WE15.</p> <p>The approach appears acceptable.</p>	No change has been made to this RAG rating.
WE16	Further information required regarding water supply and consumptive use to understand water demand and ensure the surrounding area can meet this need without impacts to environment.	Chapter 9: Water Environment of the ES [EN010154/APP/6.1]		<p>As advised during the meeting held on 6 March 2025, the Applicant submitted a Water Resource Assessment to Anglian Water detailing water supply requirements for the proposed development. A response has since been received from Anglian Water confirming that the required water supply during construction and operation of the proposed development can be supplied.</p>	<p>It is the Applicant's risk if access to water and availability outside of Anglian Water supply poses problems pre-commencement. Issue WE16 can remain as green as long as the Applicant is confident in the scope of what Anglian Water is able to supply. There are no concerns regarding what Anglian Water are able to supply, however it is our understanding that they are not providing supply for non-domestic uses until longer term strategic resource options are developed. This would mean that whilst supply for</p>	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Environment Agency Response	Updates to RAG rating
			Green		welfare stations would be covered, other consumptive demands that have been previously identified would not. We would request that the Water Resources Assessment be made available with the application documents for review in order to share this confidence that the need to consider other sources of supply (within regulation) is not required.	
WE17	Further information required to understand permitting and licencing requirements	Consents and Agreements Positions Statement [EN010154/APP/3.3]	Green	A Consents and Agreements Positions Statement [EN010154/APP/3.3] will be submitted with the DCO application.	We agree with the status of issue WE17 subject to the level of confidence described in WE16 and review of the Water Resources Assessment. It is not anticipated that significant quantities of water will be needed during construction and there is the assumption that all demands are agreed by Anglian Water as per WE16. However, the practical constraints of determination timescales and potentially restrictive conditions mean that it is important that any abstraction licences are documented here if there are water demands of >20m3/day outside of Anglian Water's supply.	No change has been made to this RAG rating.
WE18	Consultation required on draft documents (e.g. FRA, EMPs, BNG strategy (listed in consultation response)).	N/A	Green	Due to programme constraints, documents will be shared upon acceptance of the DCO application to allow sufficient time for review prior to examination.	We agree with the status of issue WE18 and look forward to reviewing draft documents once these are made available after the application has submitted to and accepted by the Planning Inspectorate. We would welcome the provision of relevant documents for our review prior to submission, where possible.	No change has been made to this RAG rating.
WE19	Submission of disapplication requests as early as possible (minimum 6 months).	N/A	Yellow	Comment is noted.	It is unclear as to why WE19 has been included as an issue when the Applicant has not formally requested the disapplication of any Flood Risk Activity Permits. Please refer to our comments on issue WE10 for further details on disapplication. We therefore suggest that WE19 is removed from this document.	No change has been made to this RAG rating.
EA ADD1	Additional Issue Raised by EA- Witham Washlands Flood Storage Area (FSA)	Flood Risk Assessment, Appendix 9-C of the	Yellow	The FRA addresses flood risk posed by the development in relation to Witham Washlands FSA.	We wish to identify an additional issue relating to the Witham Washlands FSA. The flood risk posed by the development in relation to Witham Washlands FSA, which is designated functional floodplain, has not been	RAG rating provided by the EA.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Environment Agency Response	Updates to RAG rating
		ES [EN010154/APP/6.3]	Yellow		satisfactorily assessed. Whilst the main solar panel infrastructure part of the development is outside the Witham Washlands area, the grid connection cable area does fall within this area and has not been considered.	
EA ADD2	Additional Issue Raised by EA- Waste management strategy	Framework Construction Environmental Management Plan [EN010154/APP/7.7]	Green	<p>The Applicant will continue to engage with the EA regarding the waste management strategy.</p>	<p>We wish to identify an additional issue which we raised in our response to the Preliminary Environmental Information Report (PEIR) consultation in relation to the design life and replacement frequency for key components, and the storage of waste batteries. Previous engagement has confirmed that the overall waste strategy will be presented in the documents submitted as part of the Development Consent Order application. We acknowledge that further explanation on how the key components will be recycled/waste will be managed will also be included.</p> <p>In relation to the storage of waste batteries, the Applicant has confirmed previously that an Outline Battery Safety Management Plan will provide further information on battery safety and that rather than storing waste batteries on site they will be removed immediately and will follow waste duty of care as outlined in the management plans.</p> <p>On the basis that the Applicant will discuss this matter further with the Environment Agency sufficiently ahead of Examination, we propose this issue to be rated as green.</p>	RAG rating provided by the EA.

Table 3-3 Potential Main Issues for Examination for Historic England

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Historic England's Response	Updates to RAG Rating
SS1	Omission of Conservation Area in Chapter 2 of PEI Report.	Chapter 2: Site and Surroundings of the ES [EN010154/APP/6.1]		The information has now been included within Chapter 2: Site and Surroundings of the ES [EN010154/APP/6.1] .	The contents of the PMIE were discussed in a meeting held with Historic England on 4 July 2025. HE indicated there was nothing further to add in an email dated 8 July 2025.	No change has been made to this RAG rating.
CH1	Further engagement required regarding views to Lincoln Cathedral. Further Assessment recommended of views toward Aubourn due to potential for impacts on views towards the medieval old church (Grade II listed).	Detailed Heritage Asset Setting Assessment, Appendix 7-D of the ES [EN010154/APP/6.3]		Detailed consideration of the setting of designated heritage assets is presented in Appendix 7-D Detailed Heritage Asset Setting Assessment of the ES [EN010154/APP/6.3] .	The contents of the PMIE were discussed in a meeting held with Historic England on 4 July 2025. HE indicated there was nothing further to add in an email dated 8 July 2025.	No change has been made to this RAG rating.
CH2	Suggested that if buried remains are to be preserved in situ, a management plan is essential to prevent harm from post-construction remedial and maintenance activities. This plan must be clearly documented to ensure its consideration throughout the scheme's lifespan.	Framework Operational Environmental Management Plan [EN010154/APP/7.8]		Measures relating to buried remains are included in the Framework Operational Environmental Management Plan [EN010154/APP/7.8] to be submitted with the DCO application.	The contents of the PMIE were discussed in a meeting held with Historic England on 4 July 2025. HE indicated there was nothing further to add in an email dated 8 July 2025.	No change has been made to this RAG rating.

Table 3-4 Potential Main Issues for Examination for Lincolnshire County Council

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
IN1	To note updated National Planning Policy Framework (NPPF) in Environmental Statement (ES) documents.	Environmental Statement [EN010154/APP/6.1]	Green	References to the NPPS have been addressed within the Environmental Statement (ES).	No comment.	No change has been made to this RAG rating.
TP1	Further dialogue required regarding AC-coupled and DC-coupled BESS options and information on advantage and disadvantage of each and whether one option would be assessed in the DCO. Lincolnshire Fire and Rescue to be consulted on options.	Environmental Statement [EN010154/APP/6.1]	Green	Both AC and DC options have been retained for flexibility in the DCO application. Each assessment within the ES considers the worst case scenario, or where this is not clear assesses both options. The Lincolnshire Fire and Rescue Services have been consulted in relation to the Proposed Development including the development of the Framework Battery Safety Management Plan. Furthermore, guidance from the National Fire Chiefs Council has been incorporated into the Framework Battery Safety Management Plan. Close consultation will continue with the Lincolnshire Fire and Rescue Services throughout the planning process.	No comment.	No change has been made to this RAG rating.
TP2	Navenby Substation - information required regarding considering contingency should the substation be delayed or not go ahead.	Environmental Statement [EN010154/APP/6.1]	Yellow	The DCO application is based on the assumption that the proposed National Grid Substation near Navenby will be constructed. The grid connection agreement has been secured on the basis of the proposed National Grid Substation near Navenby coming forward, therefore alternatives have not been considered.	Understand the rationale statement provided, however consider this should be a medium risk as LCC have concerns regarding timescales relating to the Navenby Substation.	The RAG rating for this issue was previously green. However, has been updated to amber in response to LCC's comments
TP3	Project lifespan - query regarding whether 60 year lifespan is to be considered permanent rather than temporary - reference to NPS EN-3.	Environmental Statement [EN010154/APP/6.1]	Yellow	Throughout the ES, the Proposed Development is referred to as 'long-term, temporary'.	LCC understands the rationale put forward by the applicant and agree that the applicant considers the project to be long term temporary. However, LCC has concerns over the longevity of the scheme, it being multi-generational and potential long term permanent impacts.	The RAG rating for this issue was previously green. However, has been updated to amber in response to LCC's comments
TP4	Grazing - further thought required regarding mechanisms of ensuring grazing can take place. Grazing management plan is recommended to be	Chapter 3: The Proposed Development of the ES [EN010154/APP/6.1]	Yellow	Chapter 3: The Proposed Development of the ES [EN010154/APP/6.1] outlines how grazing is the Applicant's preferred option for the management of grassland created within the Solar PV array areas, however landowner consent is still required, and would be agreed	No comment.	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
	produced to be securable and deliverable via the DCO. Consideration for grazing animals other than sheep.		Yellow	should consent be granted. Where grazing is not possible, grassland will still be managed by mowing.		
TP5	Design parameters to be clearly outlined in the ES. Welcome discussion on assessment parameters including viewpoint selection and mitigation.	Proposed Development Parameters [EN010154/APP/7.4]	Green	The DCO application includes a document titled 'Proposed Development Parameters'. The design parameters, which represent the worst case scenario and are used for the purposes of environmental assessment, are outlined in the document.	No comment.	No change has been made to this RAG rating.
TP6	Clarification required on whether replacement of solar infrastructure would be phased or over a longer period. Some of the impacts identified during construction phase would therefore apply.	Chapter 3: The Proposed Development of the ES [EN010154/APP/6.1]	Green	Further detail is provided in Chapter 3: The Proposed Development of the ES [EN010154/APP/6.1] which sets out that during operation it is anticipated that maintenance and servicing would include the inspection and, if required, renewal and removal, reconstruction, refurbishment or replacement of faulty or broken equipment, but not the removal, reconstruction or replacement of all panels at the same time. If full panel and BESS replacement is required at some point during the lifetime of the Proposed Development, activity would be phased.	No comment.	No change has been made to this RAG rating.
ALT1	Chapter 4 does not reference alternatives to if Navenby substation did not come forward. Key consideration within the assessment of alternatives and so an assessment should be conducted.	Environmental Statement [EN010154/APP/6.1]	Yellow	The DCO application is based on the assumption that the proposed National Grid Substation near Navenby will be constructed. The grid connection agreement has been secured on the basis of the proposed National Grid Substation near Navenby coming forward, therefore alternatives have not been considered.	LCC understands the applicant's viewpoint. However consider this could be a medium risk as TP2 above.	The RAG rating for this issue was previously green. However, has been updated to amber in response to LCC's comments
CH3	Study area - minimum study area of 2km suggested for all above-ground non-designated heritage assets. LCC also recommends a single fixed distance of 5km rather than two different distances for designated assets.	Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]	Yellow	A tiered study area is considered more appropriate for the assessment of above ground non-designated heritage assets; a 5km study area is not considered necessary. The study areas proposed align with other solar farm schemes in Lincolnshire. Applying a 5km study area for both designated and non-designated assets would scope in thousands of heritage assets and is not proportionate. A 5km study area	Whilst LCC acknowledges Historic England's support for the proposed study area methodology, this appears to relate principally to the assessment of the most significant designated heritage assets. LCCs view remains that a 2km study area should be adopted for all above-ground heritage assets, with a 1km buffer appropriate for non-designated assets. This approach aligns with precedent from other solar schemes across Lincolnshire. We also note that Scoping Report Figure 8-1 (page 5/5) shows a 3km study area for designated	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
			Yellow	<p>has been applied for designated assets of highest significance around the Principal Site. Supporting this, Historic England's Scoping Report Consultation Response confirmed the suitability of the approach to the Study Areas and further information is provided in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1] and accompanying Figures 7-1 to 7-3 [EN010154/APP/6.3].</p>	<p>assets. At the very least, we consider it reasonable to request a schedule of all above-ground heritage assets within a 2km radius of the Order Limits, including their identification and approximate distance. This level of information is proportionate and appropriate at this stage in the process.</p>	
CH4	Cumulative impact - current study area does not account for cumulative impact beyond 1-3km of the boundary. LCC expect more detail in ES.	<p>Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]</p> <p>Detailed Heritage Asset Setting Assessment, Appendix 7-D of the ES [EN010154/APP/6.3]</p>	Yellow	<p>The study areas considered in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1] align with other solar farm schemes in Lincolnshire. Applying a greater study area for both designated and non-designated assets would scope in thousands of heritage assets and is not considered proportionate. A 5km study area has been applied for designated assets of highest significance around the Principal Site. Historic England's Scoping Report Consultation Response confirmed the suitability of the approach to the Study Areas. It should be noted that there are no heritage assets beyond 1km of the DCO Site which would be subject to any harm from the Proposed Development, as set out in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1], and so accordingly there would be no potential for cumulative effects in relation to Cumulative Schemes in combination with the Proposed development at this distance. Detailed assessment of the setting of assets sensitive to the Proposed Development, as well as cumulative assessment in conjunction with relevant Cumulative Schemes, is set out in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1], with detailed consideration of the setting presented in Appendix 7-D Detailed Heritage Asset Setting Assessment [EN010154/APP/6.3].</p>	<p>LCC have not seen sufficient evidence to support the applicant's conclusion that "no heritage assets beyond 1km of the DCO Site would be subject to harm," or that cumulative effects do not extend beyond that distance. Further clarification and signposting to the relevant analysis in Chapter 7 of the ES and Appendix 7-D would be welcome. In the absence of this, the issue remains under discussion and should be categorised as medium risk.</p>	<p>The RAG rating for this issue was previously green. However, has been updated to amber in response to LCC's comments</p>
CH5	Greater clarity requested on what is taken forward for assessment in the ES.	Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]	Yellow	<p>The Preliminary Environmental Information Report comprised a preliminary assessment of non-designated heritage assets. A detailed</p>	<p>Please refer to LCCs comments under CH3 regarding appropriate study areas. In addition, we draw the applicant's attention to the Planning Inspectorate's</p>	<p>The RAG rating for this issue was previously green. However, has been</p>

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
	Specific threshold distance for inclusion of non-designated assets should be agreed in advance		Yellow	assessment of setting of assets sensitive to the Proposed Development, as well as cumulative assessment in conjunction with Cumulative Schemes, is presented in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]. A flexible approach to the assessment, based on sensitivity of assets to likely impacts, has been utilised, with Historic England's comments on the Scoping Report Consultation approving of this approach. It should be noted that the ES includes consideration of non-designated heritage assets (where these were considered, following initial scoping, to be sensitive to the Proposed Development).	Scoping Opinion, Cultural Heritage ID 3.1.2 (Paragraph 8.2.1), which advises: "Effort should also be made to agree the study areas and likely receptors for the assessment with the relevant consultation bodies, and justification for the use of the study areas proposed provided." Given this advice, and the current lack of clear agreement, we consider this issue to remain under discussion and recommend the RAG status be amended to medium risk.	updated to amber in response to LCC's comments
CH6	Lack of group value approach in cumulative assessment for heritage. Expect cumulative assessment to be developed for ES, particularly for non-designated assets such as historic farmsteads.	Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]	Yellow	The settings assessment and cumulative assessment presented in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1] followed the Historic England (2017) guidance (Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets (second edition)) with group value considered where relevant to the assets and the Proposed Development.	The current assessment does not adequately address the group value of historic farmsteads and other dispersed rural building types, which are characteristic of this landscape and contribute cumulatively to its historic character. We encourage further engagement to agree a proportionate approach to assessing group value within the ES, particularly in relation to the setting and interrelationship of farmsteads across the development area.	The RAG rating for this issue was previously green. However, has been updated to amber in response to LCC's comments
CH7	Concern that current mitigation in PEIR does not adequately resolve the issue of transition from a rural setting to a semi-industrial solar landscape. Further detail required in ES. Suggested to expand the study area and agreement on distances for the study area to enhance transparency and consistency.	Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]	Yellow	The Preliminary Environmental Information Report comprised a preliminary assessment. A detailed assessment of setting of assets sensitive to the Proposed Development and historic landscape, is to be presented in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]. The commentary on flexible approach to study areas and assessment is also provided and has been supported by Historic England. Furthermore, regarding the transition to the Proposed Development, the Framework Landscape and Ecological Management Plan (LEMP) sets out proposals that seek to integrate the Proposed Development into the landscape setting, thereby aiming to avoid or minimise	LCC welcomes the commitment to mitigation and a flexible approach to setting assessment as outlined in the rationale. However, we await the full presentation of these proposals within the ES before confirming our position. Until the transition from rural to semi-industrial character and its impact on the setting of heritage assets is clearly evidenced and assessed, this issue should remain categorised as medium risk.	The RAG rating for this issue was previously green. However, has been updated to amber in response to LCC's comments

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
			Yellow	adverse effects on the landscape, biodiversity, heritage and visual effects as much as possible.		
CH8	Archaeological evaluation - concern regarding level of archaeological evaluation undertaken to date - reference to NPS EN-3. Desk based assessment followed by geophysical survey and a trenching programme suggested. Areas of proposed planting should be included in evaluation programme. Concerns raised regarding reference to ground disturbance within the non-technical summary (e.g. installation of drainage swales / removal of cables during decommissioning)	Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]	Yellow	The ES has been informed by desk-based assessment (which included review of previous archaeological investigations), a LiDAR and aerial photograph report, a geophysical survey and (ongoing) trial trench evaluation, which inform the understanding of potential impacts to archaeological remains and the identification of the appropriate mitigation measures in relation to archaeological resource. The approach to archaeological evaluation via trial trenching has been agreed with the County Archaeologist at Lincolnshire County Council.	LCC has altered all archaeological matters to medium risk. Matters subject to discussion upon further information provided with submission. Resolution is hoped for all archaeology matters LCC feels as though amber more accurately reflects the current position particularly as some matters require evaluation work and submission of documents yet to be submitted.	The RAG rating for this issue was previously green. However, has been updated to amber in response to LCC's comments
CH9	Concern regarding archaeological significance beneath the A46 and recommendation for ground-truthing by trial trenching.	Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]	Yellow	Geophysical survey has been completed and the approach to trial trenching set out in a Written Scheme of Investigation was approved by the County Archaeologist at Lincolnshire County Council. The results of these investigations (including ongoing trial trenching) inform the ES and further archaeological mitigation.	No comment.	The RAG rating for this issue was previously green. However, has been updated to amber in response to LCC's comments
CH10	Concern regarding use of concrete blocks as an alternative to piling.	Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]	Yellow	The Preliminary Environmental Information Report contained preliminary assessment and discussed a range of options which could be available, depending on impacts of the Proposed Development and the archaeological resource. The mitigation measures as proposed within the ES are informed by further surveys and an understanding of the archaeological remains which may be affected by the Proposed Development. Chapter 3: The Proposed Development of the ES [EN010154/APP/6.1] sets out that some	No comment.	The RAG rating for this issue was previously green. However, has been updated to amber in response to LCC's comments

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
			Yellow	panels may be mounted on concrete blocks, however this would be subject to archaeological survey and agreement with the relevant stakeholders.		
CH11	Omission of above ground impacts and reference to only one specific archaeological site in the non-technical summary.	Framework Construction Environmental Management Plan [EN010154/APP/7.7]	Yellow	The ES considers the impacts of all elements of the Proposed Development which have the potential to affect the archaeological resource and areas of impact have been targeted within the Written Scheme of Investigation which has been approved by the County Archaeologist at Lincolnshire County Council.	No comment.	The RAG rating for this issue was previously green. However, has been updated to amber in response to LCC's comments
CH12	Framework CEMP - further detail and specific mitigation measures required for ES. Use of 'wherever possible' is unacceptable.	Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]	Yellow	The Framework Construction Environmental Management Plan [EN010154/APP/7.7] commented on was prepared to accompany the PEI Report (which is preliminary). An updated Framework CEMP is included as part of the DCO application.	No comment.	The RAG rating for this issue was previously green. However, has been updated to amber in response to LCC's comments
CH13	Requirement to engage on trial trenching results to inform the AMS	Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]	Yellow	The Applicant has engaged with the County Archaeologist at Lincolnshire County Council and Historic England throughout the pre-application stage.	No comment.	The RAG rating for this issue was previously green. However, has been updated to amber in response to LCC's comments
CH14	Consistent programme of engagement required with Heritage Stakeholders and agreement on mitigation strategy	Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]	Yellow	The Applicant has engaged with the County Archaeologist at Lincolnshire County Council and Historic England throughout the pre-application stage. The suite of desk-based and field investigations, presented in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1] , has allowed for confident and robust statements (acknowledging any specific and inherent limitations) to be made on the likelihood of the presence of buried archaeological remains, their potential importance, the likely effects of the Proposed Development and to direct a suitable mitigation strategy.	No comment.	The RAG rating for this issue was previously green. However, has been updated to amber in response to LCC's comments
CH15	Disagreement with Table 7-4 Summary of Residual Effects, for example 'the earthworks associated with	Framework Construction Environmental	Yellow	The Preliminary Environmental Information Report contained preliminary assessment, and further information is provided within the ES. It should be noted however that impacts of the	No comment.	The RAG rating for this issue was previously green. However, has been updated to amber in

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
	the settlement of Morton' - LCC consider there are omissions to mitigation measures.	Management Plan [EN010154/APP/7.7] Framework Landscape and Ecological Management Plan [EN010154/APP/7.15]	Yellow	Proposed Development on the settlement of Morton were deemed limited (resulting in partial loss, not substantial impact).		response to LCC's comments
E5	LCC would welcome the opportunity to provide further input to the detailed design of new habitats to be established on site at the appropriate stage.	Terrestrial Habitats and Notable Flora, Appendix 8-B of the ES [EN010154/APP/6.3]	Green	<p>Relevant habitat protective measures during construction are to be set out in the Framework Construction Environmental Management Plan [EN010154/APP/7.7].</p> <p>Full details of habitat creation, management and monitoring for the lifetime of the Proposed Development are set out in the Framework Landscape and Ecological Management Plan [EN010154/APP/7.15]. The locations of proposed ecological mitigation and enhancement measures are illustrated on the Framework Landscape Masterplan in Annex A of the Framework LEMP. LCC will be a consultee for the discharge of the requirements related to the preparation of a detailed CEMP and LEMP.</p>	No comment.	No change has been made to this RAG rating.
E6	Bat surveys and botanical surveys to be presented in ES	Chapter 8: Ecology and Nature Conservation of the ES [EN010154/APP/6.1] Chapter 15: Cumulative Effects and Interactions of the ES [EN010154/APP/6.1]	Green	Additional transect and static surveys were carried out within the appropriate seasons in 2024, to ensure better coverage of representative habitats across the Order Limits (in response to changes in the Order Limits and access to land). Full details and results of the bat surveys are presented in Appendix 8-I: Bats of the ES [EN010154/APP/6.3]. Detailed hedgerow surveys and surveys for important arable flora including condition assessments for Biodiversity Net Gain (BNG) (where applicable), were undertaken within the appropriate survey seasons in 2024, details of which are presented in Appendix 8-B: Terrestrial Habitats and Notable Flora of the ES [EN010154/APP/6.3].	No comment.	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
E7	Detailed cumulative assessment to be presented in the ES.	Landscape and Visual Impact Assessment Methodology, Appendix 10-B of the ES [EN010154/APP/6.3]		A cumulative effect assessment undertaken in Chapter 8: Ecology and Nature Conservation of the ES [EN010154/APP/6.1] has identified, for each Important Ecological Feature, the areas where the predicted effects of the Proposed Development could interact with effects arising from other plans and/or projects on the same feature based on a spatial and/ or temporal basis.	No comment.	No change has been made to this RAG rating.
LV2	Confirmation required that receptors beyond 2km study area will not be impacted.	Chapter 3: The Proposed Development of the ES [EN010154/APP/6.1]. Chapter 10: Landscape and Visual Amenity of the ES [EN010154/APP/6.1].		The approach to defining the LVIA study area is described within Appendix 10-B: Landscape and Visual Impact Assessment Methodology of the ES [EN010165/APP/6.3]. This has also included the consideration of longer distance views from properties beyond 2km, details of which are provided in Appendix 10-G Landscape and Visual Amenity Study Area Analysis of the ES [EN010165/APP/6.3].	LCC agrees with the landscape and visual matters discussed within the PMIE document and consider that all can remain as low risk, LCC will need to review the LVIA chapter of the ES once submitted and accepted to identify further issues to raise at the examination. By reason of its mass and scale, the Development would likely lead to Significant adverse effects on landscape character and visual amenity at all main phases of the scheme (construction, operation year 1, residual). The Development has the potential to transform the local landscape by altering its character on a large scale across an extensive area. This landscape change also has the potential to affect a wider landscape character, at a regional scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness, tranquillity and agricultural character that are identified as defining characteristics of the area. The scale and extent of development would also lead to Significant adverse effects on views from receptors, by altering from views within an agricultural or rural landscape to that of a landscape with large scale solar development.	No change has been made to this RAG rating.
LV3	Panel Replacement - clarification as to whether this would be once or multiple throughout duration of Scheme. Additional information required re single construction stage, or a	Chapter 3: The Proposed Development of the ES [EN010154/APP/6.1] Chapter 10: Landscape and		Further correspondence has taken place with AAH Consultants via email and virtual meetings. The design parameters including approach to replacement of scheme elements is set out in Chapter 3: The Proposed Development and the assumptions on which the LVIA is based are detailed at Section 10.4 of Chapter 10:	No comment.	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
	series of staged reconstruction stages. Further dialogue required.	Visual Amenity of the ES [EN010154/APP/6.1]		<p>Landscape and Visual Amenity of the ES [EN010154/APP/6.1].</p> <p>Chapter 3: The Proposed Development of the ES [EN010154/APP/6.1] which sets out that during operation it is anticipated that maintenance and servicing would include the inspection and, if required, renewal and removal, reconstruction, refurbishment or replacement of faulty or broken equipment, but not the removal, reconstruction or replacement of all panels at the same time. If full panel and Battery Energy Storage System replacement is required at some point during the lifetime of the Proposed Development, activity would be phased.</p>		
LV4	Clarification of the impact of the access points required and extent of vegetation loss required for access points. Also relating to potential 'reconstruction' associated with panel replacement. Further dialogue welcomed.	Chapter 3: The Proposed Development of the ES [EN010154/APP/6.1] Chapter 10: Landscape and Visual Amenity of the ES [EN010154/APP/6.1]		Further correspondence has taken place with AAH Consultants via email and virtual meetings. The design parameters including access points are detailed in Chapter 3: The Proposed Development of the ES [EN010154/APP/6.1] and the assumptions on which the LVIA is based are detailed at Section 10.4 of Chapter 10: Landscape and Visual Amenity of the ES [EN010154/APP/6.1].	No comment.	No change has been made to this RAG rating.
LV5	Reassurance required that mitigation measures have strong and robust long-term management strategies that ensure successful re-establishment. Welcome management policies to ensure the establishment of the planting extent to 2048 and then will be reviewed to address mature planting management.	Landscape and Visual Impact Assessment Methodology, Appendix 10-B of the ES [EN010154/APP/6.3]		The Applicant has committed to vegetation management within the Proposed Development, details of which are included in the Framework Landscape and Ecological Management Plan [EN010154/APP/7.15].	No comment.	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
LV6	Viewpoints that confirm reduction to 2km study area required and confirmation required that receptors have been scoped out due to no impact (recommended to include but note they are scoped out). Omission that ZTV hatching does not continue beyond 2km boundary when potential visibility would extend beyond 2km to the north, south and west of the Principal Site.	Proposed Development Parameters [EN010154/APP/7.4]		The approach to defining the LVIA study area is described within Appendix 10-B: Landscape and Visual Impact Assessment Methodology of the ES [EN010154/APP/6.3]. This has also included the consideration of longer distance views, beyond 2 km, details of which are provided in Appendix 10-G Landscape and Visual Amenity Study Area Analysis of the ES [EN010154/APP/6.3].	No comment.	No change has been made to this RAG rating.
LV7	Reservations regarding blanket offsets, more individual approach recommended with blanket distances being a minimum standard	Chapter 3: The Proposed Development of the ES [EN010154/APP/6.1] Chapter 10: Landscape and Visual Amenity of the ES [EN010154/APP/6.1]		The design parameters including offsets from different features are detailed in Chapter 3: The Proposed Development and the assumptions on which the LVIA is based are detailed at Section 10.4 of Chapter 10: Landscape and Visual Amenity of the ES [EN010154/APP/6.1]. Offsets are also set out in the Design Commitments, Appendix A to the Design Approach Document.	No comment.	No change has been made to this RAG rating.
LV8	Detail required regarding how mitigation planting is protected across lifespan of development especially during replacement of elements.	Framework Landscape and Ecological Management Plan [EN010154/APP/7.15]		A Framework Landscape and Ecological Management Plan [EN010154/APP/7.15] has been prepared and will be submitted with the DCO application which provides details of the planting proposed for the Proposed Development and vegetation management throughout the duration of the operation of the Proposed Development, which includes any maintenance/replacement/refurbishment works. Habitats will be monitored, in line with the management prescriptions set out in Section 5 of the Framework Landscape and Ecological Management Plan, to ensure correct establishment and growth is achieved, and	No comment.	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
				remedial action (such as re-seeding if establishment fails) would be taken as relevant to ensure implementation of planting is successful and planting remains throughout the duration of the development, including during periods of component replacement.		
LV9	Viewpoints - useful to see contrast between summer and winter views. Location image for ease of reference for each viewpoint. Avoid duplication of viewpoints.	Framework Landscape and Ecological Management Plan [EN010154/APP/7.15]		Each viewpoint (Figure 10-8: Viewpoint Photography [EN010154/APP/6.2] , submitted with the DCO application) is labelled with whether it shows the summer or winter view, within the description of the view shown. Summer and winter views for viewpoints (where relevant) are shown on consecutive pages such that it is clear to view the contrast between the two. Figure 10-7 of the ES shows the location and direction of view for each viewpoint. The viewpoints have not been duplicated, as shown in this Figure.	No comment.	No change has been made to this RAG rating.
LV11	Collaborative involvement required in the preparation of Landscape Management Documents	Landscape and Visual Amenity Study Area Analysis, Appendix 10-G of the ES [EN010154/APP/6.3]		A Framework Landscape and Ecological Management Plan [EN010154/APP/7.15] is provided as part of the DCO application. LCC will be a consultee for the discharge of the requirement related to the preparation of a detailed Landscape and Ecological Management Plan.	No comment.	No change has been made to this RAG rating.
LV12	No viewpoints for PRoWs beyond the 2km study area despite continuation of routes beyond 2km	Figures 10-6 and 10-7 of the ES [EN010154/APP/6.2]		The approach to defining the LVIA study area is described in Section 10.4 of Chapter 10: Landscape and Visual Amenity of the ES and within Appendix 10-B: Landscape and Visual Impact Assessment Methodology of the ES. This has also included the consideration of longer distance views details of which are provided in Appendix 10-G Landscape and Visual Amenity Study Area Analysis of the ES [EN010154/APP/6.2] . This Appendix considers the existing visual amenity of representative viewpoints, including PRoWs beyond 2km from the DCO Site, and their likelihood of experiencing significant effects as a result of the Proposed Development. This Appendix concludes for each viewpoint that people in these locations are unlikely to experience any changes as a result of	No comment.	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
			Green	the Proposed Development, therefore justifying the scope of the viewpoints considered within Chapter 10: Landscape and Visual Amenity of the ES.		
LV13	No detail beyond 2km for Figures 10-6 and 10-7. Particularly pertinent when considering residential areas of North Hykeham.	Chapter 12: Socio-Economics and Land Use of the ES [EN010154/APP/6.1]	Green	Figures 10-6 and 10-7 of the ES [EN010154/APP/6.2] have been amended to show detail beyond the 2km LVIA Study Area	No comment.	No change has been made to this RAG rating.
SE2	Concerns for visual degradation of countryside and impact on visitor economy	N/A	Green	Impacts on the amenity of visitor attractions have been assessed in Section 12.7 of Chapter 12: Socio-Economics and Land Use of the ES [EN010154/APP/6.1]. The villages of Coleby, Bassingham, Navenby and Aubourn have been identified as having visitor and recreational attractions. Chapter 10: Landscape and Visual Amenity of the ES [EN010154/APP/6.1] finds that views of construction activity will be visible from these villages at a distance, although activity will be largely screened by vegetation. Overall, the assessment establishes a Negligible effect on the amenity of visitor attractions and recreational facilities, which is Not Significant.	No comment.	No change has been made to this RAG rating.
SE3	LCC would like to explore with the developer the potential for local communities to benefit. LCC would like to be involved in discussions on Community Funding. Ideas given in consultation response.	Figure 3-3 of the ES [EN010154/APP/6.2]	Green	Should the Proposed Development be consented, the Applicant will provide a sum of money per megawatt (MW) per year to be spent on community benefits, although this does not form part of the DCO application.	No comment.	No change has been made to this RAG rating.
SE4	Further improvements could be made to PRoW network - further discussion welcome. Note to ensure appropriate buffers from PRoW to solar infrastructure.	Framework Public Rights of Way Management Plan [EN010154/APP/7.14]	Green	To improve connectivity and the PRoW network, several permissive paths are proposed as shown on Figure 3-3 of the ES [EN010154/APP/6.2]. The siting of solar PV panels and associated infrastructure seeks to minimise instances of development on both sides of PRoW. Where development is proposed adjacent to a PRoW, an	No comment.	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting Application Evidence	To	RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
				Green	offset of a minimum of 10m either side of the centre line has been incorporated. Where development is proposed on both sides of a PRoW, sections of wider offsets have also been integrated to avoid a 'canyon effect' and vary the extent of views experienced across the Principal Site where practicable.		
SE5	Advice should be sought from Council's PRoW officer with relation to proposed diversions and PRoW management plan.	Framework Public Rights of Way Management Plan [EN010154/APP/7.14]		Green	A Framework Public Rights of Way Management Plan [EN010154/APP/7.14] has been developed in accordance with discussions held with the Highways Authority at LCC and National Highways and is submitted with the DCO application.	No comment.	No change has been made to this RAG rating.
SE6	Baseline or assessment should include the grid connection corridor as well as principal site. Important to inform restoration of soils.	Chapter 12: Socio-Economics and Land Use of the ES [EN010154/APP/6.1]		Red	An ALC Survey of the Cable Corridor has not been undertaken at this stage. Given the need to maintain flexibility in the cable corridor (e.g. because of the planning application recently submitted to North Kesteven District Council for the Brant Battery Energy Storage System proposed scheme (Reference Ref: 25/0533/FUL) and existing overhead lines), if any best and most versatile (BMV) land is detected, it will not be able to be avoided. However, when applying IEMA's significance criteria this will not constitute a significant effect. Therefore, it is not deemed essential to undertake this survey at this stage as it would not change the significance of effect or the location of the proposed infrastructure. This position has been discussed with Natural England in a meeting held on 20 February 2025. This approach aligns with other, consented solar NSIPs.	No comment.	No change has been made to this RAG rating.
SE7	Clarification required on BMV land and calculations reached regarding comparing to amount of BMV land in Lincolnshire.	Chapter 12: Socio-Economics and Land Use of the ES [EN010154/APP/6.1]		Green	Section 12-10 within Chapter 12: Socio-Economics and Land Use of the ES [EN010154/APP/6.1] addresses the amount of BMV land in Lincolnshire.	LCC will review ES chapter once submitted.	No change has been made to this RAG rating.
TT11	Concern with routing for HGVs accessing C-019 on a single lane track from A15	Framework Construction Traffic Management Plan		Green	HGV routing has been finalised, and the forecast vehicle numbers for both the Principal Site and Cable Corridor are detailed in Chapter 13 Traffic	No comment.	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
	- LCC suggest access via C-018 used instead.	[EN010154/APP/7.18]		<p>and Transport of the ES [EN010154/APP/6.1].</p> <p>Access C-019 has been moved and a new location has been agreed with the Highways Authority at LCC.</p>		
TT12	Swept path analysis required to demonstrate narrow rural roads are suitable for use and informed by LCC as Highways Authority	Framework Construction Traffic Management Plan [EN010154/APP/7.18]		<p>A meeting was held with LCC on 28 February 2025 regarding access and related swept path analysis, and following further email correspondence, the Highways Authority is satisfied with the proposed access arrangements.</p> <p>Details of the swept path analysis are included in the Framework Construction Traffic Management Plan (CTMP) as well as Annex A, B and C of the Framework CTMP submitted with the DCO application.</p>	No comment.	No change has been made to this RAG rating.
OT5	Encourage dialogue with Lincolnshire Fire and Rescue regarding Battery Safety.	Framework Construction Environmental Management Plan [EN010154/APP/7.7] Framework Operational Environmental Management Plan [EN010154/APP/7.8] Framework Decommissioning Environmental Management Plan [EN010154/APP/7.9] Chapter 14: Other Environmental Topics of the ES [EN010154/APP/6.1]		<p>The Lincolnshire Fire and Rescue Services have been consulted in relation to the Proposed Development including the development of the Framework Battery Safety Management Plan. Furthermore, guidance from the National Fire Chiefs Council has been incorporated into the Framework Battery Safety Management Plan. Close consultation will continue with the Lincolnshire Fire and Rescue Services throughout the planning process.</p>	No comment.	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
OT6	Waste Management Strategy encouraged to be produced as part of ES. LCC expects ongoing updates to any WMS produced.	Chapter 14: Other Environmental Topics of the ES [EN010154/APP/6.1]		<p>It was confirmed in a meeting with LCC held on 24 February 2025 that a standalone Waste Management Strategy is not required.</p> <p>The overall strategy is set out in the Framework Construction Environmental Management Plan [EN010154/APP/7.7], Framework Operational Environmental Management Plan [EN010154/APP/7.8], Framework Decommissioning Environmental Management Plan [EN010154/APP/7.9] and Chapter 14: Other Environmental Topics of the ES [EN010154/APP/6.1]</p>	<p>LCC will review the outline documents once submitted with the application.</p>	No change has been made to this RAG rating.
OT7	Careful consideration required to operational waste.	Chapter 14: Other Environmental Topics of the ES [EN010154/APP/6.1]		<p>Operational waste is addressed in Chapter 14: Other Environmental Topics of the ES [EN010154/APP/6.1]. During the operational stage, all management of waste will be in accordance with the relevant regulations and waste will be transported by licensed waste hauliers to waste management sites which hold the necessary regulatory authorisation and/or permits for those wastes consigned to them.</p>	<p>LCC agrees that this should be a medium risk, it would be incredibly helpful to understand the amount of operational waste anticipated to be created (e.g. panel failure rates) and what the applicant intends to do with such waste.</p>	No change has been made to this RAG rating.
OT8	Lincolnshire Fire and Rescue Services would welcome discussion to view transport strategy, better understand risks and procedures to mitigate risks.	Framework Construction Environmental Management Plan [EN010154/APP/7.7]		<p>The Lincolnshire Fire and Rescue Services have been consulted in relation to the Proposed Development, as set out in the Framework Battery Safety Management Plan submitted with the DCO. Consultation included a meeting with the Lincolnshire Fire and Rescue Services to share preliminary site plans, including discussion around emergency site accesses, which has informed the final design. Further consultation with the Lincolnshire Fire and Rescue Services allowed for the development of the Framework Battery Safety Management Plan – for example the Framework Battery Safety Management Plan has been developed in accordance with a table of design expectations/comments from the Lincolnshire Fire and Rescue Services (based on the National Fire Chiefs Council guidance), which included a number of transport-related items. Close consultation will continue with the</p>	<p>No comment.</p>	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting Application Evidence	To RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire County Council's response	Updates to RAG Rating
				Lincolnshire Fire and Rescue Services throughout the planning process.		
OT9	LCC expects an Emergency Management Plan to be included within finalised ES.	Environmental Statement [EN010154/APP/6.1]		An Emergency Response Plan is committed to within the Framework Construction Environmental Management Plan [EN010154/APP/7.7] and will be produced post-consent as part of the final CEMP.	No comment.	No change has been made to this RAG rating.
CU2	Consideration should be given to geographical scale of all other NSIP projects within Lincolnshire and adjacent authority areas.	Chapter 15: Cumulative Effects and Interactions of the ES [EN010154/APP/6.1].		This comment is noted and has been considered in the ES where appropriate, in particular in the assessment of cumulative effects of the Proposed Development with other solar schemes in Chapter 15: Cumulative Effects and Interactions of the ES [EN010154/APP/6.1] as relevant.	No comment.	No change has been made to this RAG rating.

Table 3-5 Potential Main Issues for Examination for Lincolnshire Wildlife Trust

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire Wildlife Trust Response	Updates to RAG Rating
E1	Tunman Wood - permissive paths recommended to be positioned outside of site boundary of Tunman Wood. Recommendation to create an ecotone of two habitats outside the boundary of Tunman Wood to promote biodiversity.	Framework Landscape and Ecological Management Plan [EN010154/APP/7.15]	Green	<p>The permissive paths around the edge of Tunman Wood that were shown on the layout plan at the Statutory Consultation stage have been removed.</p> <p>Whilst an ecotone is not proposed, there will be a 15m offset between the boundary of Tunman Wood and the site, with undeveloped areas to allow for natural regeneration of the woodland edge, ensure the health and longevity of vegetation and retain the existing structure of the landscape. Details of this are set out in the Framework Landscape and Ecological Management Plan [EN010154/APP/7.15], which is submitted as part of the DCO application.</p>	Agree with status.	No change has been made to this RAG rating.
E2	Habitat Creation and Enhancement - recommendation for modified grassland beneath the solar arrays rather than species rich.	Biodiversity Net Gain Report [EN010154/APP/7.12]	Green	<p>Based on other solar schemes the target of modified grassland is more likely to be achieved between and under the panels. Opportunities exist in other open areas for targeting more species rich grassland. This will be further detailed within the Framework Landscape and Ecological Management Plan [EN010154/APP/7.15] to be submitted with the DCO application. Areas of grassland proposed beneath the panels are shown in Figure 7.15-1: Landscape Mitigation Plans (to be submitted with the DCO application.)</p>	Agree with status.	No change has been made to this RAG rating.
E3	Biodiversity units should not be sold on to other development projects and should remain within this scheme contributing to the 'additionality' pillar of the BNG framework	Biodiversity Net Gain Report [EN010154/APP/7.12]	Red	<p>Full details of the Biodiversity Net Gain (BNG) assessment are provided in the Biodiversity Net Gain Report [EN010154/APP/7.12] to be submitted with the DCO application. The delivery of BNG is secured under a Requirement in the draft Development Consent Order.</p>	Agree with status.	No change has been made to this RAG rating.
E4	Ground nesting birds - concern regarding cumulative impact on ground-nesting birds and want to see considerable effort to minimise these impacts.	Appendix 8-G: Breeding Birds and Appendix 8-H: Non-breeding Birds of the ES [EN010154/APP/6.3].	Green	<p>Surveys for breeding and non-breeding birds, including ground nesting birds, have been undertaken across the DCO Site, the full results of which are included in Appendix 8-G: Breeding Birds and Appendix 8-H: Non-breeding Birds of the ES [EN010154/APP/6.2].</p>	Agree with status.	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Lincolnshire Wildlife Trust Response	Updates to RAG Rating
				<p>Cumulative effects on ground nesting birds is considered in Chapter 8 Ecology and Nature Conservation of the ES [EN010154/APP/6.1], which concludes that there will be no effects from cumulative developments which are similar in nature to the Proposed Development as a result of the mitigation included within the respective developments.</p>		

Table 3-6 Potential Main Issues for Examination for National Highways

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View Likelihood of Issue Being Resolved During Examination	National Highways Response	Updates to RAG Rating
WE1	Further detail and consultation required on surface water drainage proposals.	Framework Surface Water Drainage Strategy, Appendix 9-D of the ES [EN010154/APP/6.3]	Green	Further detail on surface water drainage proposals for the Proposed Development is provided in the Framework Surface Water Drainage Strategy (Appendix 9-D of the Environmental Statement (ES) [EN010154/APP/6.3]) .	Noted and agree. We look forward to reviewing the drainage documents. At this stage, we consider this issue to remain a low-risk item (Green).	No change has been made to this RAG rating.
TT1	Site access – potential access direct to the A46 does not comply with DMRB guidance.	Chapter 13: Traffic and Transport of the ES [EN010154/APP/6.1]	Green	A direct access onto the A46 is no longer being considered for the Proposed Development, as a result of comments received from National Highways.	Noted and agree. We consider this a low-risk item (Green).	No change has been made to this RAG rating.
TT2	Cable route - potential interaction with A46 SRN	Chapter 13: Traffic and Transport of the ES [EN010154/APP/6.1] Framework Construction Traffic Management Plan [EN010154/APP/7.18]	Yellow	<p>It is proposed that a cable will be constructed under the A46 to connect the northern and southern parts of the Proposed Development. The Applicant is aware of the requirements of National Highways under CD622, and will address these post consent, should consent for the Proposed Development be granted. The Applicant is also currently negotiating Protective Provisions for the benefit of National Highways to cover interactions between the Proposed Development and National Highways' assets, to be included in the Draft Development Consent Order.</p> <p>Chapter 13: Traffic and Transport of the ES [EN010154/APP/6.1] will set out the forecasted construction traffic impacts as well as the proposed construction traffic management during the construction phase. Further details on how the A46 and other roads within the vicinity of the DCO Site will be managed to mitigate impacts will be set out in the Framework Construction Traffic Management Plan to be submitted as part of the DCO application.</p>	Noted and agreed. In accordance with Circular 01/2022 and DMRB CD 622, we will first undertake a review of the principle of routing the cable beneath the A46, once the relevant information becomes available through the DCO process. The remaining design and delivery works will be incorporated into the Protected Provisions document to ensure that National Highways' technical approval processes are followed appropriately.	No change has been made to this RAG rating.
TT3	Traffic model - confirmation required regarding data being factored up for the 2032 base year model.	Chapter 13: Traffic and Transport of the ES [EN010154/APP/6.1]	Yellow	As set out in Chapter 13: Traffic and Transport of the ES [EN010154/APP/6.1], three different survey years have been used for the assessment (2022, 2023 and 2025), which have each been factored up to the future	We have reviewed all correspondence and documents from November 2024 to March 2025 of the PEI Report, which address these points. The approach is considered reasonable, however, as the construction traffic impact is yet to be fully assessed and subject to	The RAG rating for this issue was previously green. However, has been updated to amber in

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View Likelihood of Issue Being Resolved During Examination	National Highways Response	Updates to RAG Rating
			Yellow	baseline year of 2032 using growth factors extracted from TEMPro as agreed.	the submission of the Framework CTMP, we consider this a medium-risk item (Amber).	response to National Highway's comments.
TT4	Construction - further details required on minibus service, including trip distribution figures and how construction worker traffic impacts on SRN are not underestimated. Query regarding modal split in Table 13-15 of PEI Report therefore further information and evidence required.	Chapter 13: Traffic and Transport of the ES [EN010154/APP/6.1]	Green	Details regarding the proposed minibus service, trip distribution and the construction staff vehicle split have been reviewed and confirmed for the assessment as part of the meeting with National Highways held in March 2025. Distribution and staff vehicle split (the modal split) was discussed during the latest meeting held with National Highways, meeting minutes are to be presented within Appendix 13-B of the ES [E010154/APP/6.3]. During this meeting, no additional comments were raised.	We have reviewed Chapter 13: Traffic and Transport of the PEIR and are satisfied with the points outlined, including the use of the 2022, 2023, and 2025 survey years and the application of TEMPro growth factors to project the future baseline year of 2032, as agreed. We look forward to receiving the ES for review in due course. At this stage, we consider this issue to remain a low-risk item (Green).	No change has been made to this RAG rating.
TT5	SRN Junctions - HGV trip generation should be broken down into hourly two-way trips, with an assessment of how these trips will affect SRN junction. Evidence of how HGVs and non-HGVs will be distributed across the SRN required.	Chapter 13: Traffic and Transport of the ES [EN010154/APP/6.1]	Green	As set out in Chapter 13: Traffic and Transport of the ES [EN010154/APP/6.1], forecast HGV trips have been broken down into hourly two-way trips, and the distribution of HGV and non-HGV trips along the SRN (A46) split across different routes dependent on where the works across the Principal Site are taking place as different zones utilise different vehicle routing. The HGV trip window has been adjusted to eight hours (09:00-17:00) so that no trips occur within the SRN during the traditional AM and PM network peaks. During the assessed AM and PM development peaks, the assessment also indicates that there are Negligible impacts for all link and junction receptors in the SRN.	The approach is considered reasonable, and as the methodology for the construction staff vehicle split is appropriate, we consider this a low-risk item (Green) with no further comments.	No change has been made to this RAG rating.
TT6	Significant effect - Disagreement that no significant effects are expected at A46 east and west of Halfway House Roundabout, A46 East of Fosse Lane and A46 slip roads with Fosse Lane.	Chapter 13: Traffic and Transport of the ES [EN010154/APP/6.1]	Green	Further commentary and analysis on trip generation and distribution and the modal split (in particular the A46) is presented within Chapter 13: Traffic and Transport of the ES and supporting appendices which includes traffic flow diagrams for the whole study area. Chapter 13: Traffic and Transport of the ES [EN010154/APP/6.1] concludes that there are no residual significant effects of the Proposed Development on any of the Traffic and Transport receptors in the construction and	We welcome the adjustment of the HGV trip window to 09:00-17:00 which are set outside of SRN peak hours. However, we note that Table 13-17 of the PEIR, references the HGV trip window of 08:00-18:00. Based on our calculations, the adjusted HGV trip window results in an average of 6 HGV trips per hour. This change does not present a material impact to National Highways; however, please could future iterations of the forecasted vehicle trip data reflect the updated eight-hour period (09:00-17:00) for completeness and consistency.	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View Likelihood of Issue Being Resolved During Examination	National Highways Response	Updates to RAG Rating
			Green	decommissioning phase, including at the A46 east and west of the Halfway House Roundabout, the A46 East of Fosse Land and the A46 slip roads with Fosse Lane. See Section 13.4 and 13.7 of Chapter 13: Traffic and Transport of the ES, Appendix 13-C: Traffic and Transport Significance Assessment Summary and Appendix 13-D: Receptor Traffic Flow Tables [EN010154/APP/6.3] submitted with the DCO application.		
TT7	Consultation required on Traffic Flow Diagram to inform whether a junction capacity assessment is required.	Chapter 13: Traffic and Transport of the ES [EN010154/APP/6.1] Traffic and Transport Significance Assessment Summary, Appendix 13-C of the ES [EN010154/APP/6.3] Receptor Traffic Flow Tables, Appendix 13-D of the ES [EN010154/APP/6.3]	Green	Chapter 13: Traffic and Transport of the ES [EN010154/APP/6.1] and its and supporting appendices [EN010154/APP/6.3] presents commentary and analysis on trip generation and distribution and the modal split (in particular the A46) which includes traffic flow diagrams for the whole study area. During the consultation with National Highways it was stated that the trips generation would be robust and there would be no development trips in the standard network peak which would trigger the need for further junction capacity assessments. See Section 13.4 and 13.7 of Chapter 13: Traffic and Transport of the ES , as well as Appendix 13-C: Traffic and Transport Significance Assessment Summary and Appendix 13-D: Receptor Traffic Flow Tables [EN010154/APP/6.3] to be submitted with the DCO application.	We consider the approach to be reasonable, and based on the information presented in Sections 13.4 and 13.7 of Chapter 13: Traffic and Transport of the PEIR and Appendix 13-C, which indicate no significant impact on the SRN during the construction and decommissioning phases, we consider this a low-risk item (Green) as the underlying analysis has not been reviewed.	No change has been made to this RAG rating.
TT8	Consultation required on methodology to assess cumulative impacts during the peak construction period.	Chapter 13: Traffic and Transport of the ES [EN010154/APP/6.1]	Green	The cumulative assessment and list of schemes was discussed in the meeting held on 7 March 2025 and the approach agreed.	Appendix 13-D: Receptor Traffic Flow Tables have been located, however, the traffic flow diagrams referred to in Column C have not been located in the attachments and are yet to be provided. We consider this a low-risk item (Green).	No change has been made to this RAG rating.
TT9	Engagement required regarding protective provisions with National Highways legal team.	N/A	Green	Engagement on Protective Provisions is underway and ongoing with National Highways' legal team.	Chapter 13: Traffic and Transport of the PEIR notes that construction traffic may peak between 07:00-08:00 and 18:00-19:00, which is identified in the 7 March 2025 Meeting Note as a worst-case scenario. It is proposed that construction workers will travel outside of the peak SRN hours to minimise impact. As the list of cumulative	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View Likelihood of Issue Being Resolved During Examination	National Highways Response	Updates to RAG Rating
			Green		schemes is yet to be confirmed, this aspect will need to be reviewed once that information becomes available. We consider this a low-risk item (Green).	
TT10	Consultation required to agree contents of Construction Traffic Management Plan (CTMP).	Framework Construction Traffic Management Plan [EN010154/APP/7.18]	Green	A Framework Construction Traffic Management Plan [EN010154/APP/7.18] has been produced which includes all the information requested by National Highways and will be submitted with the DCO application.	Agreed. At this stage, we consider this issue to remain a low-risk item (Green).	No change has been made to this RAG rating.
OT1	Lighting - consultation required on external lighting details	Chapter 3: Proposed Development of the ES [EN010154/APP/6.1]	Green	Details of proposed lighting is provided in Chapter 3: Proposed Development of the ES [EN010154/APP/6.1] which will be submitted as part of the DCO application.	The approach is reasonable and providing the Framework CTMP includes all information requested by National Highways in previous engagement dated 20/11/2024, we would consider that this issue will remain a low risk item. Any temporary traffic management on the SRN which will be installed for more than 6 months as per DMRB GG 119 will be mandated to comply and produce a Road Safety Audit.	No change has been made to this RAG rating.
OT2	Glint and Glare - recommendation to model two heights to adequately predict effects on drivers of HGVs and inclusion of glint and glare mitigation in Landscape and Ecological Management Plan.	Chapter 14: Other Environmental Topics of the ES [EN010154/APP/6.1]	Green	The glint and glare model used in the Environmental Statement has been run at 1.5m in height and it also assesses the visibility at 2.5m in height. This incorporates everything that would be using a road, including HGVs. Within the assessment presented in Chapter 14: Other Environmental Topics of the ES [EN010154/APP/6.1] , mitigation has been proposed such that there is enough coverage during the times of year where the potential for glare impacts may occur on road users including HGVs.	The approach is reasonable and providing the submission item noted in the Rationale column provides a full description of the exterior lighting scheme and luminaire details, we would consider that this issue will remain a low risk item (green).	No change has been made to this RAG rating.

Table 3-7 Potential Main Issues for Examination for Natural England

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	Natural England Response	Updates to RAG Rating
SE1	Agricultural Land Classification (ALC) - Recommendation that survey of entire site boundary should be undertaken including the cable corridor.	Chapter 12: Socio-Economics and Land Use of the ES [EN010154/APP/6.1]		<p>An ALC Survey of the Cable Corridor has not been undertaken at this stage.</p> <p>Given the need to maintain flexibility in the cable corridor (e.g. because of the planning application recently submitted to North Kesteven District Council for the Brant Battery Energy Storage System (Reference Ref: 25/0533/FUL) and existing overhead lines), if any best and most versatile land is detected, it will not be able to be avoided. However, when applying IEMA's significance criteria this will not constitute a significant effect. Therefore, it is not deemed essential to undertake this survey at this stage as it would not change the significance of effect or location of the Proposed Development's Cable Corridor. This approach aligns with other, consented solar NSIPs.</p> <p>This position has been discussed with Natural England in a meeting held on 20 February 2025.</p>	No response received.	No change has been made to this RAG rating.

Table 3-8 Potential Main Issues for Examination for National Grid Electricity Transmission

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	National Grid Electricity Transmission's Response	Updates to RAG Rating
OT3	Utilities - Requirement for consultation and engagement regarding existing overhead lines (4ZM 400kV OHL (Bicker Fen-Spalding North-West Burton / Bicker Fen-Walpole-West Burton).	Draft Development Consent Order [EN010154/APP/3.1]		Engagement is ongoing with all statutory undertakers with apparatus that has the potential to be affected by the Proposed Development in order to agree protective provisions to be included in the Draft Development Consent Order [EN010154/APP/3.1] . The Applicant is currently in discussions with NGET's legal team to agree protective provisions for the benefit of NGET in the Draft Development Consent Order [EN010154/APP/3.1] .	No response received.	No change has been made to this RAG rating.

Table 3-9 Potential Main Issues for Examination for North Kesteven District Council

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	North Kesteven District Council Response	Updates to RAG Rating
TP7	Concern regarding 60-year timeframe - further dialogue required.	Environmental Statement [EN010154/APP/6.1]	Yellow	<p>A 60 year time limited consent is being sought to maximise the renewable energy generation of the Proposed Development and to allow for the replacement of panels halfway through if there is a loss in output capacity. A 60 year time period also allows flexibility for a technological leap in PV arrays after a few decades should it be available. The operational life of the Proposed Development is anticipated to be 2033 to 2093.</p> <p>Furthermore, the Proposed Development is referred to as a long term, reversible development throughout the Environmental Statement (ES).</p>	Suggest this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on North Kesteven District Council (NKDC) reviewing the application and associated appendices	The RAG rating for this issue was previously green. However, has been updated to amber in response to NKDC's comments.
ALT 2	Not clearly explained how the sequential and exception test has been applied and used to inform site selection.	Site Selection Report, Appendix A of the Planning Statement [EN010154/APP/7.2]	Green	<p>This is demonstrated in the Site Selection Report to be submitted as part of the DCO application (Appendix A to the Planning Statement [EN010154/APP/7.2]). Areas of land in Flood Zones 2 and 3 were initially excluded in the site selection assessment in order to ascertain if an unconstrained site could deliver the Proposed Development, with land at lower risk of flooding (Flood Zone 1) only being considered for proposed infrastructure at this stage.</p> <p>As a suitable site could not be identified, sites subject to constraints were reintroduced into the site selection assessment, including areas within Flood Zones 2 and 3. Given the approach taken, it has been demonstrated that the sequential test has been considered in site selection.</p> <p>The Planning Statement explains how the sequential and exception tests are met at a site specific level.</p>	NKDC is likely to defer to the LLFA, EA and the Internal Drainage Boards on flood risk matters	No change has been made to this RAG rating.
EIA 1	Further clarification required on the process of replacement to both the PV	Chapter 3: The Proposed Development of the	Green	Further detail is provided in Chapter 3: The Proposed Development of the ES [EN010154/APP/6.1] which sets out that	No comment.	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	North Kesteven District Council Response	Updates to RAG Rating
	and larger equipment on Site throughout life of development.	ES [EN010154/APP/6.1]	Green	during operation it is anticipated that maintenance and servicing would include the inspection and, if required, renewal and removal, reconstruction, refurbishment or replacement of faulty or broken equipment, but not the removal, reconstruction or replacement of all panels at the same time. If full panel and BESS replacement is required at some point during the lifetime of the Proposed Development, activity would be phased.		
CL1	Consideration should be given to impact on Climate Change of waste panels due to intermediate component replacement.	Chapter 6: Climate Change of the ES [EN010154/APP/6.1]	Yellow	The greenhouse gas (GHG) assessment within Chapter 6: Climate Change of the ES [EN010154/APP/6.1] addresses the replacement and disposal of panels. Embodied emissions and waste disposal due to replacements are presented in the operational assessment of effects in Section 6.4.49 onwards (in line with Chapter 14: Other Environmental Topics, Section 14.5 Materials and Waste), assuming replacement after 30 years and 10% for ad hoc replacements.	Suggest this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices	The RAG rating for this issue was previously green. However, has been updated to amber in response to NKDC's comments.
CL2	Latest carbon factors to be used in the ES.	Chapter 6: Climate Change of the ES [EN010154/APP/6.1]	Yellow	The latest emission factors from the Inventory of Carbon and Energy (ICE) V4.0 database and the UK Department of Energy Security and Net Zero (DESNZ) greenhouse gas reporting 2024 are used in the assessment calculations in Chapter 6: Climate Change of the ES [EN010154/APP/6.1]. A review of Environmental Product Declarations (EPDs) and best available data for electronic components has formed part of the GHG assessment.	Suggest this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices	The RAG rating for this issue was previously green. However, has been updated to amber in response to NKDC's comments.
CH1 6	Disagree with approach that focuses on assets of 'highest value' which appears subjective and unsubstantiated. As a result, assets within the study area have not been	Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]	Yellow	Historic England's Scoping Report Consultation Response confirmed the suitability of the approach to the Study Areas and further information is provided in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1] and accompanying Figures 7-1-7-3 [EN010154/APP/6.2]. The	Suggest this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices	The RAG rating for this issue was previously green. However, has been updated to amber in response to NKDC's comments.

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	North Kesteven District Council Response	Updates to RAG Rating
	considered or assessed. Separate table or appendix recommended.		Yellow	assessment has considered both designated and non-designated heritage assets and buried archaeology.		
CH1 7	Engagement required with Conservation Officer following the PEIR.	Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]	Yellow	<p>The detailed responses to Scoping and the Preliminary Environmental Information Report from the Conservation Officer were welcomed. All comments have been addressed in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1].</p> <p>There are no material issues that would warrant further discussions or meetings therefore further engagement is not considered necessary. Appropriate study areas were discussed and agreed with Historic England through consultation. See consultation details in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1].</p>	<p>Suggest this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices – see below in relation to cultural heritage/heritage assets study area.</p>	<p>The RAG rating for this issue was previously green. However, has been updated to amber in response to NKDC's comments.</p>
CH1 8	Requested 5km study area. Further consultation required with CO to agree study area.	Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]	Yellow	<p>The study areas considered in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1] align with other solar farm schemes in Lincolnshire. Applying a greater study area for both designated and non-designated assets would scope in thousands of heritage assets and is not considered proportionate. A 5km study area has been applied for designated assets of highest significance around the Principal Site. Historic England's Scoping Report Consultation Response confirmed the suitability of the approach to the Study Areas. It should be noted that there are no heritage assets beyond 1km of the DCO Site which would be subject to any harm from the Proposed Development, as set out in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1], and so accordingly there would be no potential for cumulative effects in relation to Cumulative Schemes in combination with the Proposed development at this distance. All comments have been addressed in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]. There are no</p>	<p>Suggest as minimum this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices however the Springwell solar park has adopted a 5km buffer for designated assets to identify those with potential for effects resulting from changes in their setting and a 2km buffer from the Site for non-designated assets – see Chapter 9 para 9.4.1 of the Springwell ES.</p>	<p>The RAG rating for this issue was previously green. However, has been updated to amber in response to NKDC's comments.</p>

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	North Kesteven District Council Response	Updates to RAG Rating
			Yellow	material issues that would warrant further discussions / meetings therefore further engagement is not considered necessary.		
CH19	Further consultation welcomed regarding reliance on embedded mitigation covering any eventualities.	Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1]	Yellow	<p>Embedded mitigation comprises measures that form part of the design of the Proposed Development which have been incorporated in order to reduce impacts on a range of receptors including known heritage assets. Examples include setbacks from Listed Buildings, vegetation planting and improvements or excluding complex archaeological remains from the design and thereby avoiding any related impacts.</p> <p>The assessment has been undertaken on the assumption that the embedded mitigation is applied and before later mitigation is introduced. This process results in no significant residual effects as presented in Chapter 7: Cultural Heritage of the ES [EN010154/APP/6.1].</p>	Suggest this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices - see above in relation to cultural heritage/heritage assets study area.	The RAG rating for this issue was previously green. However, has been updated to amber in response to NKDC's comments.
WE20	Sequential test: Contradiction between paragraphs 6.1.2 and conclusions in Paragraphs 2.2.50 and 6.1.10 regarding sequential test. Query regarding compliance with requirements on EN-1 and NPPF with respect to sequential test.	Flood Risk Assessment, Appendix 9-C of the ES [EN010154/APP/6.3]	Green	The Flood Risk Assessment, Appendix 9- [EN010154/APP/6.3] has been updated for the ES. Appendix 9-C: Flood Risk Assessment of the ES provides the updated version of the Flood Risk Assessment, which includes an explanation regarding the sequential and exception tests. The Planning Statement also provides an explanation of the sequential test and exception test at the site selection stage, and at the site level.	NKDC is likely to defer to the LLFA, EA and the Internal Drainage Boards on flood risk matters	No change has been made to this RAG rating.
WE21	Recommendation to include a figure in the ES which overlays areas of solar, solar stations, BESS and on site substation across flood risk information to appreciate how scheme design has sought to avoid areas of high flood risk	Flood Risk Assessment, Appendix 9-C of the ES [EN010154/APP/6.3]	Green	With the exception of solar panels, no above ground solar infrastructure is proposed within Flood Zones 2 and 3.	NKDC is likely to defer to the LLFA, EA and the Internal Drainage Boards on flood risk matters	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	North Kesteven District Council Response	Updates to RAG Rating
LV15	Further consultation recommended with the Council's Landscape Consultant following PEIR Consultation and prior to ES Preparation	Chapter 10: Landscape and Visual Amenity of the ES [EN01054/APP/6.1]	Green	Further meetings and email exchange has occurred since the production of the Preliminary Environmental Information Report and Statutory Consultation, and prior to preparation of the ES.	Suggest this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices. NKDC will take advice from AAH consultants on LVIA matters.	NKDC proposed that this issue was amber, however given engagement has been undertaken, the RAG rating has not been updated and remains green.
NV2	Consultation welcomed with Environmental Health Officers following PEIR Consultation and prior to ES being prepared to understand how it is intended to reduce significant noise impacts.	Chapter 11: Noise and Vibration of the ES [EN01054/APP/6.1]	Green	A meeting was held with the Environmental Health Officers on 27 February 2025 to discuss the reduction of noise impacts, and no follow up actions were identified.	No comment.	This RAG rating remains as sent to NKDC.
SE8	The section on National Planning Policy section does not reference the relevant sections in EN-3 on agricultural land in the socio economics and land use chapter of the ES.	Chapter 12: Socio-Economics and Land Use of the ES [EN010154/APP/6.1]	Green	The appropriate amendment has been made to the ES.	Unclear what this PMI refers to. (Note this has been clarified in the "description of issue" column of this table)	NKDC proposed that this issue was amber, however given the issue refers to a reference to national planning policy, that has been addressed in the Environmental Statement, the RAG rating has not been updated and remains green.
SE9	Need to ensure Soil Management Plans remain robust for 60 year life span	Framework Soil Management Plan [EN010154/APP/7.10]	Yellow	The Framework Soil Management Plan [EN010154/APP/7.10] submitted with the DCO application, has been amended to reflect the 60 year operational life of the Proposed Development.	Suggest this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices.	The RAG rating for this issue was previously green. However, has been updated to amber in response to NKDC's comments.
SE10	Further information required on economic impact - e.g. farm businesses.	Chapter 12: Socio-Economics and Land Use of the ES [EN010154/APP/6.1]	Yellow	Further information on the economic impact of the Proposed Development is set out within Chapter 12: Socio- Economics and Land Use of the ES [EN010154/APP/6.1].	Suggest this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices.	The RAG rating for this issue was previously green. However, has been updated to amber in response to NKDC's comments.
SE11	Amendment required to numbers of Agricultural Land Class in PEIR	Chapter 12: Socio-Economics and Land Use of the ES [EN010154/APP/6.1]	Green	The appropriate amendment has been made to the ES.	Unclear what this PMI refers to.	NKDC proposed that this issue was amber, however given the issue refers an amendment that has been

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	North Kesteven District Council Response	Updates to RAG Rating
	Chapter and Appendix - to rectify for ES		Green			addressed in the Environmental Statement, the RAG rating has not been updated and remains green.
SE1 2	Review impact of the construction phase on availability of serviced accommodation, NKDC suggest proportionally greater than reported in PEIR	Chapter 12: Socio-Economics and Land Use of the ES [EN010154/APP/6.1]	Yellow	The impact on the availability of serviced accommodation during the construction phase has been reviewed and the assessment is presented in Chapter 12: Socio- Economics and Land Use of the ES [EN010154/APP/6.1] .	Suggest this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices.	The RAG rating for this issue was previously green. However, has been updated to amber in response to NKDC's comments.
SE1 3	Confirmation required on how the value of £21.3m has been derived for proportion of construction spend contracted locally. What proportion of total spend on construction will be contracted locally, what criteria will be used to encourage local companies to apply for contracts.	Chapter 12: Socio-Economics and Land Use of the ES [EN010154/APP/6.1]	Yellow	Gross Value Added (GVA) is a measure of the value of what the labour force produces, the output it generates within a geography, which would be that within the Proposed Development itself during construction in this context. Estimated GVA per construction worker (£21.3m in the Study Area) has been derived from identifying total output from the ONS Labour productivity by region by industry dataset for 2022 for the East Midlands and dividing this by jobs in the construction industry in the same region reported by the Business Register Employment Survey. The East Midlands is considered the appropriate benchmark for the local 60-minute Study Area, as data is published at this level rather than the more granular, LSOA-derived, Study Area itself; this approximates to local benefit. The approach ensures that the assessment reflects the direct economic contribution of the Proposed Development, particularly in terms of employment and productivity within the construction sector. This aligns with industry best practices for measuring economic impact, as it allows for a precise evaluation of the Proposed Development's contribution to job creation and economic output.	Suggest this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices.	The RAG rating for this issue was previously green. However, has been updated to amber in response to NKDC's comments.

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	North Kesteven District Council Response	Updates to RAG Rating
			Yellow	The assessment of GVA per construction worker is not a reflection of the proportion of construction spend to be contracted locally. A Framework Employment, Skills, and Supply Chain Plan [EN010154/APP/7.16] will be submitted as part of the DCO application which details the opportunities for local companies during the construction phase to apply for contracts. Whilst it is not readily possible to estimate spend procured locally as this will depend on the appointed contractor's procurement and availability of materials, the Plan will serve to maximise the proportion of total spend on construction contracted from local companies including from such businesses engaged in, for example, production and/or supply of fencing and civil materials.		
SE1 4	Why has LM3 modelling not been used	Chapter 12: Socio-Economics and Land Use of the ES [EN010154/APP/6.1]	Green	The assessment presented in Chapter 12: Socio- Economics and Land Use of the ES [EN010154/APP/6.1], aligns with other assessments of economic impacts on solar projects across England.	No comment.	No change has been made to this RAG rating.
SE1 5	Request for Skills Employment and Supply Chain Management Plan to be produced.	Framework Employment, Skills, and Supply Chain Plan [EN010154/APP/7.16]	Yellow	A Framework Employment, Skills, and Supply Chain Plan [EN010154/APP/7.16] has been prepared and will be submitted with the DCO application.	Agree that this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices but noting that NKDC will be seeking a s106 contribution running alongside the Skills Employment and Supply Chain Management Plan consistent with Heckington Fen and Springwell solar farms (respectively; completed agreement and ongoing s106 drafting).	No change has been made to this RAG rating.
SE1 6	Consultation with Council's economic development officers would be welcomed following PEIR consultation and prior to ES being prepared	Chapter 12: Socio-Economics and Land Use of the ES [EN010154/APP/6.1]	Green	Comments received from NKDC during Statutory Consultation have been considered within the assessment presented within Chapter 12: Socio-Economics and Land Use of the ES [EN010154/APP/6.1].	No comment.	No change has been made to this RAG rating.
TT1 2	Swept path analysis required to demonstrate narrow rural roads are suitable for use and	Framework Construction Traffic Management Plan	Green	A meeting was held with Lincolnshire County Council on 28 February 2025 regarding access and related swept path analysis, and following further email	NKDC is likely to defer to LCC on highways safety and capacity matters	No change has been made to this RAG rating.

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	North Kesteven District Council Response	Updates to RAG Rating
	informed by LCC as Highways Authority	[EN010154/APPP/7.18]	Green	<p>correspondence, the Highways Authority is satisfied with the proposed access arrangements.</p> <p>Details of the swept path analysis are included in the Framework Construction Traffic Management Plan, as well as Annex A, B and C of that Plan, which is submitted with the DCO application.</p>		
OT4	Waste - further information required on waste management, regarding waste battery storage and recycling of solar panels	Chapter 14: Other Environmental topics of the ES [EN010154/APP/6.1]	Yellow	<p>The overarching waste management strategy, including applying the waste hierarchy and designing out waste as per circular principles, is covered in: Chapter 14: Other Environmental topics of the ES [EN010154/APP/6.1] and the Framework Construction Environmental Management Plan [EN010154/APP/7.7], Framework Operation Environmental Management Plan [EN010154/APP/7.8] and Framework Decommissioning Environmental Management Plan [EN010154/APP/7.9].</p> <p>Discussions took place with Lincolnshire County Council, as the waste authority on waste matters on 24 February 2025, as detailed in Chapter 14: Other Environmental topics of the ES [EN010154/APP/6.1].</p>	<p>Suggest this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices although we note discussions with LCC as Waste authority.</p>	<p>The RAG rating for this issue was previously green. However, has been updated to amber in response to NKDC's comments.</p>
OT10	Mechanisms should be in place to ensure implementation of planting is successful and can survive duration of development. Also should be included as part of landscaping assessment in Chapter 10.	Framework Landscape and Ecological Management Plan [EN010154/APP/7.15]	Yellow	<p>A Framework Landscape and Ecological Management Plan [EN010154/APP/7.15] has been prepared and will be submitted with the DCO application which provides details of the planting proposed for the Proposed Development. Habitats will be monitored, in line with the management prescriptions set out in Section 5 of the Framework Landscape and Ecological Management Plan, to ensure correct establishment and growth is achieved, and remedial action (such as re-seeding if establishment fails) would be taken as relevant to ensure implementation of</p>	<p>Suggest this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices.</p>	<p>The RAG rating for this issue was previously green. However, has been updated to amber in response to NKDC's comments.</p>

Ref	Description Of Issue	Signposting To Application Evidence	RAG	Applicants View on Likelihood of Issue Being Resolved During Examination	North Kesteven District Council Response	Updates to RAG Rating
			Yellow	planting is successful and planting remains throughout the duration of the development.		
CU4	Note to assess Navenby Substation when information is available within the ES.	N/A	Red	An application for the proposed National Grid substation near Navenby has not been submitted at the time of ES preparation. However, this will be kept under review as further information should be available at examination stage.	Suggest that this is a minimum Medium risk but potentially High risk- unlikely to be resolved before the close of examination stage depending on the status/programming of the NGNS planning application during the examination stage but also whether draft Requirements or other provisions within the Draft Development Consent Order seek to align the phased construction of the Fosse Green solar park with the delivery of the NGNS (or seek an unfettered DCO) and the degree to which the Fosse Green proposals address paragraphs 4.11.8 and 4.11.9 of EN-1.	The RAG rating for this issue was previously amber. However, has been updated to red in response to NKDC's comments.
CU5	Recommended amendments to long/short lists	Chapter 15: Cumulative Effects and Interactions of the ES [EN010154/APP/6.1]	Green	The recommended amendments from NKDC to the long and short lists, which form the basis of the cumulative effects assessment, have been included. Chapter 15 Cumulative Effects and Interactions of the ES [EN010154/APP/6.1] presents the cumulative effects assessment.	No comment.	No change has been made to this RAG rating.
DS1	Orchards proposed next to NW04, W03 and W04 - clarification required as to whether these would be managed by the Applicant for BNG or offered to the Parish Council for a Community Orchard	N/A	Yellow	The proposed community orchards would be managed by the Applicant; however the Applicant is happy to discuss the transfer of management of the community orchard with the Parish Council although recognises that there may be limitations related to cost and operational management.	No comment.	No change has been made to this RAG rating.
DS2	Recommendation to remove field NE02 from Scheme	Chapter 4: Alternatives and Design Evolution of the ES [EN010154/APP/6.1]	Green	Field NE02 has been removed from the Proposed Development following feedback received during Statutory Consultation.	No comment.	No change has been made to this RAG rating.
DS3	Suggest relocating Solar Stations in proximity to Public Rights of Way (PRoW) further away.	Framework Public Rights of Way Management Plan [EN010154/APP/7.14]	Yellow	Appropriate buffers have been implemented in the Proposed Development, and reflected in the Works Plans, ensuring solar infrastructure is sufficiently offset from PRoWs.	Suggest this is Medium risk- likely to be resolved before the close of examination stage. Resolving this matter is dependent on NKDC reviewing the application and associated appendices.	The RAG rating for this issue was previously green. However, has been updated to amber in response to NKDC's comments.

Appendix B Letters sent to Stakeholders

20 June 2025

Reference: EN010154

[REDACTED] - **Anglian Water**

Email: [REDACTED]@anglianwater.co.uk

Email: developmentservices@anglianwater.co.uk

Address: Anglian Water

3 Lancaster Road

Hartlepool

Dear [REDACTED],

Fosse Green Energy- Potential Main Issues for Examination

Planning Inspectorate Case Reference: EN010154

Fosse Green Energy Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (2008 Act) for a Development Consent Order (DCO) for Fosse Green Energy (the Proposed Development). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹.

Accordingly, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document. The purpose of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The PMIE is separate from the Initial Assessment of Principal Issues (IAPI) identified by the Examining Authority (ExA), however it may influence the content of the IAPI. Further information on the purpose of the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.

The potential issues are elements of the Proposed Development that are not fully agreed with statutory bodies or local authorities, i.e. those matters with a RAG rating of Amber or Red. These have initially been identified through a review of responses to the Applicant's non statutory and statutory consultation, meetings and correspondence with Anglian Water. The issues we have identified are set out in Appendix A of this letter. Each issue has been categorised with a RAG rating as defined in Table 1 below.

Table 1 RAG Ratings

	Low risk - highly likely to be resolved before the close of examination stage.
	Medium risk - likely to be resolved before the close of examination stage.
	High risk - unlikely to be resolved before the close of examination stage.

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus)

In order to prepare the PMIE, could you please let us know if you agree the status of the potential issues for the Proposed Development in relation to Anglian Water. Please add further rows to the table at Appendix A in case there are further issues you would like to identify prior to Examination. Please return a completed copy of this table to us by the 2 July 2025 via email at the following address: info@fossegreenenergy.co.uk

Please note that the PMIE document will also influence the content of the Statement of Common Ground that the Applicant hopes to enter into with you and which it will prepare in the pre-examination period, should the DCO Application be accepted by the Planning Inspectorate.

Responses to this letter will be published in the PMIE document that will be submitted as a DCO submission document. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully

Lloyd Sandles
Projects Director
Fosse Green Energy Limited
22 Grosvenor Gardens
London
United Kingdom
SW1W 0DH

Appendix A- Potential Main Issues for Examination with Anglian Water

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG	Rationale
WE2	Impact of development on Anglian Water's assets and need for mitigation. Noting the Swinderby Water Recycling Centre (proposed upgrade and expansion to commence in 2028) needs to be considered as part of cumulative assessment.	Green	All cumulative developments within the Zone of Influence have been accounted for in the Cumulative effects assessment, which will be presented in Chapter 15 'Cumulative Effects and Interactions' of the Environmental Statement (ES), where there is an active planning application for the development. There is currently no active planning application for the Swinderby Water Treatment Works. This was discussed during a meeting held with Anglian Water on 29 April 2025 and was confirmed to be an acceptable approach.
WE3	Design of project to minimise interaction with Anglian Water assets/critical infrastructure/sewer and flood easements and land ownership and specifically to avoid the need for diversions which have associated carbon costs.	Yellow	This matter is currently under discussion with Anglian Water - Anglian Water has confirmed asset interactions and discussions are underway regarding carrying out a more detailed asset interaction search. Given the spatial flexibility built into the DCO Application the Applicant is comfortable carrying out a detailed asset interaction search post consent, ahead of detailed design.
WE4	Requirement for potable and raw water supplies (if any).	Green	A Water Resources Assessment has been provided to Anglian Water, and they have confirmed they are able to supply the water required for construction and operation of the Proposed Development.
WE5	Requirement for water recycling (surface water and foul drainage) connections (if any).	Green	A Water Resources Assessment has been provided to Anglian Water, and they have confirmed they are able to supply the water required for construction and operation of the Proposed Development.
WE6	Confirmation of the project's cumulative impacts with Anglian Water projects.	Green	All cumulative developments within the Zone Of Influence have been accounted for in the Cumulative effects assessment (to be presented in Chapter 15 'Cumulative Effects and Interactions' of the ES) where there is an active planning application for the development. There is currently no active planning application for the Swinderby Water

			Treatment Works. This was discussed during a meeting held on 29 April 2025 with Anglian Water.
WE7	Draft Protective Provisions		The Applicant is currently in discussions with Anglian Water regarding the protective provisions.
WE8	Disagreement that water supply can be scoped out of the Environmental Statement: - Water Resources Assessment required in Environmental Statement - GHG associated with transporting water by tanker rather than using mains supply. Water supply for cleaning purposes should be assessed using a Water Resources Assessment.		Water Supply has been scoped into the ES assessment and is presented within Chapter 9: Water Environment of the ES. A Water Resources Assessment has been submitted to Anglian Water and Anglian Water confirmed it is able to supply the water required during operation and construction of the Proposed Development.
NV1	Consideration to be given to vibration affecting underground services.		An assessment of construction vibration on residential receptors is presented within Chapter 11: Noise and Vibration of the ES. As set out in that chapter, the potential impact upon underground services was scoped out on the basis that a commitment has been made within the Framework Construction Environmental Management Plan (which will be submitted with the DCO Application) to undertake a risk assessment of potential damage to underground services due to construction induced vibration which could arise as a result of driven piling or Horizontal Directional Drilling (HDD), being the only mechanisms that could potentially damage underground services due to construction vibration.

20 June 2025

Reference: EN010154

[REDACTED] - Environment Agency

Email: [REDACTED]@environment-agency.gov.uk

Email: [REDACTED]@environment-agency.gov.uk

Address: Environment Agency

Lutra House

Dodd Way Off Seedlee Road

Walton Summit Centre, Bamber Bridge

Preston

PR5 8BX

Dear [REDACTED],

Fosse Green Energy- Potential Main Issues for Examination

Planning Inspectorate Case Reference: EN010154

Fosse Green Energy Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (2008 Act) for a Development Consent Order (DCO) for Fosse Green Energy (the Proposed Development). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹.

Accordingly, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document. The purpose of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The PMIE, is separate from the Initial Assessment of Principal Issues (IAPI) identified by the Examining Authority (ExA), however it may influence the content of the IAPI. Further information on the purpose of the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.

The potential issues are elements of the Proposed Development that are not fully agreed with statutory bodies or local authorities, i.e. those matters with a RAG rating of Amber or Red. These have initially been identified through a review of responses to the Applicant's non statutory and statutory consultation, meetings and correspondence with the Environment Agency. The issues we have identified are set out in Appendix A of this letter. Each issue has been categorised with a RAG rating as defined in Table 1 below.

Table 1 RAG Ratings

	Low risk- highly likely to be resolved before the close of examination stage.
	Medium risk- likely to be resolved before the close of examination stage.
	High risk- unlikely to be resolved before the close of examination stage.

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus)

In order to prepare the PMIE, could you please let us know if you agree the status of the potential issues for the Proposed Development in relation to the Environment Agency. Please add further rows to the table at Appendix A in case there are further issues you would like to identify prior to Examination. Please return a completed copy of this table to us by the 2 July 2025 via email at the following address: info@fossegreenenergy.co.uk

Please note that the PMIE document will also influence the content of the Statement of Common Ground that the Applicant hopes to enter into with you and which it will prepare in the pre-examination period, should the DCO Application be accepted by the Planning Inspectorate.

Responses to this letter will be published in the PMIE document that will be submitted as a DCO submission document. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully

Lloyd Sandles
Projects Director
Fosse Green Energy Limited
22 Grosvenor Gardens
London
United Kingdom
SW1W 0DH

Appendix A- Potential Main Issues for Examination with the Environment Agency

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG	Rationale
WE9	Concerns regarding assessment of flood risk impacts. Design changes and mitigation is recommended to ensure flood risk is not increased on or off site.		The Flood Risk Assessment (presented in Appendix 9-C of the Environmental Statement (ES)) to be submitted with the DCO Application has been prepared in accordance with feedback received by the Environment Agency, and consultation has been undertaken throughout the preparation of the document.
WE10	Further information required in relation to main rivers within/adjacent to the Site in relation to flood risk and ecology to demonstrate no issues which would prevent granting of a Flood Risk Activity Permit.		Resolved. The design and construction methodology for the cable routes under main rivers/flood defences has been discussed and detailed during the meeting held with the Environment Agency on 6 March 2025. The need for a Flood Risk Activity Permit has been dispensed under the draft DCO, with matters relating to flood risk to be agreed by way of protective provisions for the benefit of the EA in the draft DCO.
WE11	Culverting - strongly advise against culverting		No new culverts are anticipated to be required as part of the Proposed Development. One culvert extension is proposed based on the illustrative layout, and the feedback received during consultation with the EA has been considered and appropriate measures included within the Framework Construction Environmental Management Plan, to be submitted as part of the DCO Application.
WE12	Impacts on fish - further mitigation required		This matter was discussed at a meeting held on 6 March 2025 where further information was provided. It was confirmed that where any over-pumping or water drain down is required, fish rescues will be included in the mitigation requirements in Chapter 8: Ecology and Nature Conservation of the ES and the Framework Construction Environmental Management Plan, to be submitted as part of the

			DCO Application. Works would be carried out under an FR2 permit application for authorisation to use fishing instruments other than a rod and line (under S27A of the Salmon and Freshwater Fisheries Act 1975).
WE13	Enhancement of watercourses with regards to riparian habitat for water vole, otter, water-dependent habitats and geomorphology. Concern of lack of ambition.		Where there are watercourses within the site the proposal is to enhance these by a minimum of 10%. The Biodiversity Net Gain assessment will explore enhancement options for watercourses on site. This could include, but is not limited to, daylighting of existing culverts, fencing off and reducing management within the riparian zone, or in-channel restoration measures.
WE14	Further consideration regarding assessment of contaminated land in relation to the risk to controlled waters.		A Phase 1 Preliminary Risk Assessment has been undertaken and is presented within Appendix 14-C of the ES. The PRA uses the source-pathway-receptor model to present a qualitative PRA of potential land contamination risks to human (chronic), environmental, and controlled water receptors from contamination sources on, or in the vicinity of, the DCO Site. Prior to the commencement of construction works, a targeted scheme of Ground Investigation and testing followed by a Quantitative Risk Assessment will be completed. This will be in accordance, if and where necessary, with CLR11 Model Procedures for the Management of Contaminated Land, BS10175:2011+ A2:2017 Investigation of Potentially Contaminated Sites: Code of Practice and the Environment Agency's GPLC1 Guiding Principles for Land Contamination in Assessing Risks to Controlled Waters and to support the detailed design. .
WE15	Additional information required to ensure the protection of groundwater.		The recommendations regarding no fuel storage, refuelling, or vehicle washing in Source Protection Zone 3 or the Principal aquifer unless essential are noted, as well as fully bunding fuel storage in these locations. The Framework Construction Environmental

			Management Plan, to be submitted with the DCO Application, has been updated to include these points.
WE16	Further information required regarding water supply and consumptive use to understand water demand and ensure the surrounding area can meet this need without impacts to environment.		As advised during the meeting held on 6 March 2025, the Applicant submitted a Water Resource Assessment to Anglian Water detailing water supply requirements for the proposed development. A response has since been received from Anglian Water confirming that the required water supply during construction and operation of the proposed development can be supplied.
WE17	Further information required to understand permitting and licencing requirements		A Consents and Agreements Positions Statement will be submitted with the DCO Application.
WE18	Consultation required on draft documents (e.g. FRA, EMPs, BNG strategy (listed in consultation response)).		Due to programme constraints, documents will be shared upon acceptance of the DCO Application to allow sufficient time for review prior to examination.
WE19	Submission of disapplication requests as early as possible (minimum 6 months).		Comment is noted.

20 June 2025

Reference: EN010154

████████ - Historic England
Email: █████@HistoricEngland.org.uk
Email: midlands@HistoricEngland.org.uk
Email: █████@HistoricEngland.org.uk
Address: The Foundry
82 Granville Street Birmingham
B1 2LH

Dear █████

**Fosse Green Energy- Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010154**

Fosse Green Energy Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (2008 Act) for a Development Consent Order (DCO) for Fosse Green Energy (the Proposed Development). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹.

Accordingly, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document. The purpose of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The PMIE, is separate from the Initial Assessment of Principal Issues (IAPI) identified by the Examining Authority (ExA), however it may influence the content of the IAPI. Further information on the purpose of the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.

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Table 1 RAG Ratings

Green	Low risk- highly likely to be resolved before the close of examination stage.
Yellow	Medium risk- likely to be resolved before the close of examination stage.
Red	High risk- unlikely to be resolved before the close of examination stage.

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In order to prepare the PMIE, could you please let us know if you agree the status of the potential issues for the Proposed Development in relation to Historic England. Please add further rows to the table at Appendix A in case there are further issues you would like to identify prior to Examination. Please return a completed copy of this table to us by the 2 July 2025 via email at the following address: info@fossegreenenergy.co.uk

Please note that the PMIE document will also influence the content of the Statement of Common Ground that the Applicant hopes to enter into with you and which it will prepare in the pre-examination period, should the DCO Application be accepted by the Planning Inspectorate.

Responses to this letter will be published in the PMIE document that will be submitted as a DCO submission document. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully

Lloyd Sandles
Projects Director
Fosse Green Energy Limited
22 Grosvenor Gardens
London
United Kingdom
SW1W 0DH

Appendix A- Potential Main Issues for Examination with Historic England

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG	Rationale
SS1	Omission of Conservation Area in Chapter 2 of PEI Report.		The information has now been included within Chapter 2: Site and Surroundings of the Environmental Statement (ES).
CH1	Further engagement required regarding views to Lincoln Cathedral. Further Assessment recommended of views toward Aubourn due to potential for impacts on views towards the medieval old church (Grade II listed).		Detailed consideration of the setting of designated heritage assets is presented in Appendix 7-D Detailed Heritage Asset Setting Assessment of the ES.
CH2	Suggested that if buried remains are to be preserved in situ, a management plan is essential to prevent harm from post-construction remedial and maintenance activities. This plan must be clearly documented to ensure its consideration throughout the scheme's lifespan.		Measures relating to buried remains are included in the Framework Operational Environmental Management Plan to be submitted with the DCO Application.

25 June 2025

Reference: EN010154

[REDACTED] - Lincolnshire County Council

Email: [REDACTED]@lincolnshire.gov.uk
Email: [REDACTED]@lincolnshire.gov.uk
Address: County Offices,
Newland,
Lincoln,
Lincolnshire,
LN1 1YL

Dear [REDACTED]

Fosse Green Energy- Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010154

Fosse Green Energy Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (2008 Act) for a Development Consent Order (DCO) for Fosse Green Energy (the Proposed Development). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹.

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Table 1 RAG Ratings

 	Low risk- highly likely to be resolved before the close of examination stage.
 	Medium risk- likely to be resolved before the close of examination stage.
 	High risk- unlikely to be resolved before the close of examination stage.

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In order to prepare the PMIE, could you please let us know if you agree the status of the potential issues for the Proposed Development in relation to Lincolnshire County Council. Please add further rows to the table at Appendix A in case there are further issues you would like to identify prior to Examination. Please return a completed copy of this table to us by the 4 July 2025 via email at the following address: info@fossegreenenergy.co.uk

Please note that the PMIE document will also influence the content of the Statement of Common Ground that the Applicant hopes to enter into with you and which it will prepare in the pre-examination period, should the DCO Application be accepted by the Planning Inspectorate.

Responses to this letter will be published in the PMIE document that will be submitted as a DCO submission document. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully

Lloyd Sandles
Projects Director
Fosse Green Energy Limited
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SW1W 0DH

Appendix A- Potential Main Issues for Examination with Lincolnshire County Council (LCC)

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG	Rationale
IN1	To note updated National Planning Policy Framework (NPPF) in Environmental Statement (ES) documents.		References to the NPPS have been addressed within the Environmental Statement (ES).
TP1	Further dialogue required regarding AC-coupled and DC-coupled BESS options and information on advantage and disadvantage of each and whether one option would be assessed in the DCO. Lincolnshire Fire and Rescue to be consulted on options.		Both AC and DC options have been retained for flexibility in the DCO Application. Each assessment within the ES considers the worst case scenario, or where this is not clear assesses both options. The Lincolnshire Fire and Rescue Services have been consulted in relation to the Proposed Development including the development of the Framework Battery Safety Management Plan. Furthermore, guidance from the National Fire Chiefs Council has been incorporated into the Framework Battery Safety Management Plan. Close consultation will continue with the Lincolnshire Fire and Rescue Services throughout the planning process.
TP2	Navenby Substation - information required regarding considering contingency should the substation be delayed or not go ahead.		The DCO Application is based on the assumption that the proposed National Grid Substation at Navenby will be constructed. The grid connection agreement has been secured on the basis of the proposed National Grid Substation at Navenby coming forward, therefore alternatives have not been considered.
TP3	Project lifespan - query regarding whether 60 year lifespan is to be considered permanent rather than temporary - reference to NPS EN-3.		Throughout the ES, the Proposed Development is referred to as 'long-term, temporary'.

TP4	Grazing - further thought required regarding mechanisms of ensuring grazing can take place. Grazing management plan is recommended to be produced to be securable and deliverable via the DCO. Consideration for grazing animals other than sheep.		Chapter 3: The Proposed Development of the ES outlines how grazing is the Applicant's preferred option for the management of grassland created within the Solar PV array areas, however landowner consent is still required, and would be agreed should consent be granted. Where grazing is not possible, grassland will still be managed by mowing.
TP5	Design parameters to be clearly outlined in the ES. Welcome discussion on assessment parameters including viewpoint selection and mitigation.		The DCO Application includes a document titled 'Proposed Development Parameters'. The design parameters, which represent the worst case scenario and are used for the purposes of environmental assessment, are outlined in the document.
TP6	Clarification required on whether replacement of solar infrastructure would be phased or over a longer period. Some of the impacts identified during construction phase would therefore apply.		Further detail is provided in Chapter 3: The Proposed Development of the ES which sets out that during operation it is anticipated that maintenance and servicing would include the inspection and, if required, renewal and removal, reconstruction, refurbishment or replacement of faulty or broken equipment, but not the removal, reconstruction or replacement of all panels at the same time. If full panel and BESS replacement is required at some point during the lifetime of the Proposed Development, activity would be phased.
ALT1	Chapter 4 does not reference alternatives to if Navenby substation did not come forward. Key consideration within the assessment of alternatives and so an assessment should be conducted.		The DCO Application is based on the assumption that the proposed National Grid Substation at Navenby will be constructed. The grid connection agreement has been secured on the basis of the proposed National Grid Substation at Navenby coming forward, therefore alternatives have not been considered.
CH3	Study area - minimum study area of 2km suggested for all above-ground non-designated heritage assets. LCC also recommends a single fixed distance of 5km rather than two different distances for designated assets.		A tiered study area is considered more appropriate for the assessment of above ground non-designated heritage assets; a 5km study area is not considered necessary. The study areas proposed align with other solar farm schemes in Lincolnshire. Applying a 5km study area for both designated and non-designated assets would scope in thousands of heritage assets and is not proportionate. A

			5km study area has been applied for designated assets of highest significance around the Principal Site. Supporting this, Historic England's Scoping Report Consultation Response confirmed the suitability of the approach to the Study Areas and further information is provided in Chapter 7: Cultural Heritage of the ES and accompanying Figures 7-1 to 7-3.
CH4	Cumulative impact - current study area does not account for cumulative impact beyond 1-3km of the boundary. LCC expect more detail in ES.		The study areas considered in Chapter 7: Cultural Heritage of the ES align with other solar farm schemes in Lincolnshire. Applying a greater study area for both designated and non-designated assets would scope in thousands of heritage assets and is not considered proportionate. A 5km study area has been applied for designated assets of highest significance around the Principal Site. Historic England's Scoping Report Consultation Response confirmed the suitability of the approach to the Study Areas. It should be noted that there are no heritage assets beyond 1km of the DCO Site which would be subject to any harm from the Proposed Development, as set out in Chapter 7: Cultural Heritage of the ES, and so accordingly there would be no potential for cumulative effects in relation to Cumulative Schemes in combination with the Proposed development at this distance. Detailed assessment of the setting of assets sensitive to the Proposed Development, as well as cumulative assessment in conjunction with relevant Cumulative Schemes, is set out in Chapter 7: Cultural Heritage of the ES, with detailed consideration of the setting presented in Appendix 7-D Detailed Heritage Asset Setting Assessment.
CH5	Greater clarity requested on what is taken forward for assessment in the ES. Specific threshold distance for inclusion of non-designated assets should be agreed in advance		The Preliminary Environmental Information Report comprised a preliminary assessment of non-designated heritage assets. A detailed assessment of setting of assets sensitive to the Proposed Development, as well as cumulative assessment in conjunction with Cumulative Schemes, is presented in Chapter 7: Cultural Heritage of the ES.

			<p>the ES. A flexible approach to the assessment, based on sensitivity of assets to likely impacts, has been utilised, with Historic England's comments on the Scoping Report Consultation approving of this approach. It should be noted that the ES includes consideration of non-designated heritage assets (where these were considered, following initial scoping, to be sensitive to the Proposed Development).</p>
CH6	Lack of group value approach in cumulative assessment for heritage. Expect cumulative assessment to be developed for ES, particularly for non-designated assets such as historic farmsteads.		<p>The settings assessment and cumulative assessment presented in Chapter 7: Cultural Heritage of the ES followed the Historic England (2017) guidance (Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets (second edition)) with group value considered where relevant to the assets and the Proposed Development.</p>
CH7	Concern that current mitigation in PEIR does not adequately resolve the issue of transition from a rural setting to a semi-industrial solar landscape. Further detail required in ES. Suggested to expand the study area and agreement on distances for the study area to enhance transparency and consistency.		<p>The Preliminary Environmental Information Report comprised a preliminary assessment. A detailed assessment of setting of assets sensitive to the Proposed Development and historic landscape, is to be presented in Chapter 7: Cultural Heritage of the ES. The commentary on flexible approach to study areas and assessment is also provided and has been supported by Historic England. Furthermore, regarding the transition to the Proposed Development, the Framework Landscape and Ecological Management Plan (LEMP) sets out proposals that seek to integrate the Proposed Development into the landscape setting, thereby aiming to avoid or minimise adverse effects on the landscape, biodiversity, heritage and visual effects as much as possible.</p>
CH8	Archaeological evaluation - concern regarding level of archaeological evaluation undertaken to date - reference to NPS EN-3. Desk based assessment followed by geophysical survey and a trenching programme suggested. Areas		<p>The ES has been informed by desk-based assessment (which included review of previous archaeological investigations), a LiDAR and aerial photograph report, a geophysical survey and (ongoing) trial trench evaluation, which inform the understanding of potential impacts to archaeological remains and the identification of the</p>

	of proposed planting should be included in evaluation programme. Concerns raised regarding reference to ground disturbance within the Non-technical summary (e.g. installation of drainage swales / removal of cables during decommissioning)		appropriate mitigation measures in relation to archaeological resource. The approach to archaeological evaluation via trial trenching has been agreed with the County Archaeologist at Lincolnshire County Council.
CH9	Concern regarding archaeological significance beneath the A46 and recommendation for ground-truthing by trial trenching.		Geophysical survey has been completed and the approach to trial trenching set out in a Written Scheme of Investigation was approved by the County Archaeologist at Lincolnshire County Council. The results of these investigations (including ongoing trial trenching) inform the ES and further archaeological mitigation.
CH10	Concern regarding use of concrete blocks as an alternative to piling.		The Preliminary Environmental Information Report contained preliminary assessment and discussed a range of options which could be available, depending on impacts of the Proposed Development and the archaeological resource. The mitigation measures as proposed within the ES are informed by further surveys and an understanding of the archaeological remains which may be affected by the Proposed Development. Chapter 3 The Proposed Development of the ES sets out that some panels may be mounted on concrete blocks, however this would be subject to archaeological survey and agreement with the relevant stakeholders.
CH11	Omission of above ground impacts and reference to only one specific archaeological site in the non-technical summary.		The ES considers the impacts of all elements of the Proposed Development which have the potential to affect the archaeological resource and areas of impact have been targeted within the Written Scheme of Investigation which has been approved by the County Archaeologist at Lincolnshire County Council.

CH12	Framework CEMP - further detail and specific mitigation measures required for ES. Use of 'wherever possible' is unacceptable.		The Framework Construction Environmental Management Plan (CEMP) commented on was prepared to accompany the PEI Report (which is preliminary). An updated Framework CEMP is included as part of the DCO application.
CH13	Requirement to engage on trial trenching results to inform the AMS		The Applicant has engaged with the County Archaeologist at Lincolnshire County Council and Historic England throughout the pre-application stage.
CH14	Consistent programme of engagement required with Heritage Stakeholders and agreement on mitigation strategy		The Applicant has engaged with the County Archaeologist at Lincolnshire County Council and Historic England throughout the pre-application stage. The suite of desk-based and field investigations, presented in Chapter 7: Cultural Heritage of the ES, has allowed for confident and robust statements (acknowledging any specific and inherent limitations) to be made on the likelihood of the presence of buried archaeological remains, their potential importance, the likely effects of the Proposed Development and to direct a suitable mitigation strategy.
CH15	Disagreement with Table 7-4 Summary of Residual Effects, for example 'the earthworks associated with the settlement of Morton' - LCC consider there are omissions to mitigation measures.		The Preliminary Environmental Information Report contained preliminary assessment and further information is provided within the ES. It should be noted however that impacts of the Proposed Development on the settlement of Morton were deemed limited (resulting in partial loss, not substantial impact).
E5	LCC would welcome the opportunity to provide further input to the detailed design of new habitats to be established on site at the appropriate stage.		Relevant habitat protective measures during construction are to be set out in the Framework CEMP. Full details of habitat creation, management and monitoring for the lifetime of the Proposed Development are set out in the Framework LEMP. The locations of proposed ecological mitigation and enhancement measures are illustrated on the Framework Landscape Masterplan in Annex A of the Framework LEMP.

			LCC will be a consultee for the discharge of the requirements related to the preparation of a detailed CEMP and LEMP.
E6	Bat surveys and botanical surveys to be presented in ES		Additional transect and static surveys were carried out within the appropriate seasons in 2024, to ensure better coverage of representative habitats across the Order Limits (in response to changes in the Order Limits and access to land). Full details and results of the bat surveys are presented in Appendix 8-I: Bats of this ES. Detailed hedgerow surveys and surveys for important arable flora including condition assessments for Biodiversity Net Gain (BNG) (where applicable), were undertaken within the appropriate survey seasons in 2024, details of which are presented in Appendix 8-B: Terrestrial Habitats and Notable Flora of this ES.
E7	Detailed cumulative assessment to be presented in the ES.		A cumulative effect assessment undertaken in Chapter 8: Ecology and Nature Conservation of the ES has identified, for each Important Ecological Feature, the areas where the predicted effects of the Proposed Development could interact with effects arising from other plans and/or projects on the same feature based on a spatial and/ or temporal basis. T
LV2	Confirmation required that receptors beyond 2km study area will not be impacted.		The approach to defining the LVIA study area is described within Appendix 10-B: Landscape and Visual Impact Assessment Methodology of the ES. This has also included the consideration of longer distance views from properties beyond 2km, details of which are provided in Appendix 10-G Landscape and Visual Amenity Study Area Analysis of the ES.
LV3	Panel Replacement - clarification as to whether this would be once or multiple throughout duration of Scheme. Additional information required re single construction stage, or a		Further correspondence has taken place with AAH Consultants via email and virtual meetings. The design parameters including approach to replacement of

	series of staged reconstruction stages. Further dialogue required.		<p>scheme elements is set out in Chapter 3: The Proposed Development and the assumptions on which the LVIA is based are detailed at Section 10.4 of Chapter 10: Landscape and Visual Amenity of the ES.</p> <p>Chapter 3: The Proposed Development of the ES which sets out that during operation it is anticipated that maintenance and servicing would include the inspection and, if required, renewal and removal, reconstruction, refurbishment or replacement of faulty or broken equipment, but not the removal, reconstruction or replacement of all panels at the same time. If full panel and Battery Energy Storage System replacement is required at some point during the lifetime of the Proposed Development, activity would be phased.</p>
LV4	Clarification of the impact of the access points required and extent of vegetation loss required for access points. Also relating to potential 'reconstruction' associated with panel replacement. Further dialogue welcomed.		<p>Further correspondence has taken place with AAH Consultants via email and virtual meetings.</p> <p>The design parameters including access points are detailed in Chapter 3: The Proposed Development and the assumptions on which the LVIA is based are detailed at Section 10.4 of Chapter 10: Landscape and Visual Amenity of the ES.</p>
LV5	Reassurance required that mitigation measures have strong and robust long-term management strategies that ensure successful re-establishment. Welcome management policies to ensure the establishment of the planting extent to 2048 and then will be reviewed to address mature planting management.		<p>The Applicant has committed to vegetation management within the Proposed Development, details of which are included in the Framework LEMP.</p>

LV6	Viewpoints that confirm reduction to 2km study area required and confirmation required that receptors have been scoped out due to no impact (recommended to include but note they are scoped out). Omission that ZTV hatching does not continue beyond 2km boundary when potential visibility would extend beyond 2km to the north, south and west of the Principal Site.		The approach to defining the LVIA study area is described within Appendix 10-B: Landscape and Visual Impact Assessment Methodology of the ES. This has also included the consideration of longer distance views, beyond 2 km, details of which are provided in Appendix 10-G Landscape and Visual Amenity Study Area Analysis of the ES.
LV7	Reservations regarding blanket offsets, more individual approach recommended with blanket distances being a minimum standard		The design parameters including offsets from different features are detailed in Chapter 3: The Proposed Development and the assumptions on which the LVIA is based are detailed at Section 10.4 of Chapter 10: Landscape and Visual Amenity of the ES. Offsets are also set out in the Design Commitments, Appendix A to the Design Approach Document.
LV8	Detail required regarding how mitigation planting is protected across lifespan of development especially during replacement of elements.		.A Framework Landscape and Ecological Management Plan has been prepared and will be submitted with the DCO Application which provides details of the planting proposed for the Proposed Development and vegetation management throughout the duration of the operation of the Proposed Development, which includes any maintenance/replacement/refurbishment works. Habitats will be monitored, in line with the management prescriptions set out in Section 5 of the Framework Landscape and Ecological Management Plan, to ensure correct establishment and growth is achieved, and remedial action (such as re-seeding if establishment fails) would be taken as relevant to ensure implementation of planting is successful and planting remains throughout the duration of the development, including during periods of component replacement.

LV9	Viewpoints - useful to see contrast between summer and winter views. Location image for ease of reference for each viewpoint. Avoid duplication of viewpoints.		Each viewpoint (Figure 10-8: Viewpoint Photography, submitted with the DCO application) is labelled with whether it shows the summer or winter view, within the description of the view shown. Summer and winter views for viewpoints (where relevant) are shown on consecutive pages such that it is clear to view the contrast between the two. Figure 10-7 of the ES shows the location and direction of view for each viewpoint. The viewpoints have not been duplicated, as shown in this Figure.
LV11	Collaborative involvement required in the preparation of Landscape Management Documents		A Framework LEMP is provided as part of the DCO Application. LCC will be a consultee for the discharge of the requirement related to the preparation of a detailed LEMP.
LV12	No viewpoints for PRoWs beyond the 2km study area despite continuation of routes beyond 2km		The approach to defining the LVIA study area is described in Section 10.4 of Chapter 10: Landscape and Visual Amenity of the ES and within Appendix 10-B: Landscape and Visual Impact Assessment Methodology of the ES. This has also included the consideration of longer distance views details of which are provided in Appendix 10-G Landscape and Visual Amenity Study Area Analysis of the ES. This Appendix considers the existing visual amenity of representative viewpoints, including PRoWs beyond 2km from the DCO Site, and their likelihood of experiencing significant effects as a result of the Proposed Development. This Appendix concludes for each viewpoint that people in these locations are unlikely to experience any changes as a result of the Proposed Development, therefore justifying the scope of the viewpoints considered within Chapter 10: Landscape and Visual Amenity of the ES.
LV13	No detail beyond 2km for Figures 10-6 and 10-7. Particularly pertinent when considering residential areas of North Hykeham.		Figures 10-6 and 10-7 of the ES have been amended to show detail beyond the 2km LVIA Study Area

SE2	Concerns for visual degradation of countryside and impact on visitor economy		Impacts on the amenity of visitor attractions have been assessed in Section 12.7 of Chapter 12: Socio Economics and Land Use of the ES. The villages of Coleby, Bassingham, Navenby and Aubourn have been identified as having visitor and recreational attractions. Chapter 10: Landscape and Visual Amenity of the ES finds that views of construction activity will be visible from these villages at a distance, although activity will be largely screened by vegetation. Overall, the assessment establishes a Negligible effect on the amenity of visitor attractions and recreational facilities, which is Not Significant.
SE3	LCC would like to explore with the developer the potential for local communities to benefit. LCC would like to be involved in discussions on Community Funding. Ideas given in consultation response.		Should the Proposed Development be consented, the Applicant will provide a sum of money per megawatt (MW) per year to be spent on community benefits, although this does not form part of the DCO Application.
SE4	Further improvements could be made to PRoW network - further discussion welcome. Note to ensure appropriate buffers from PRoW to solar infrastructure.		To improve connectivity and the PRoW network, several permissive paths are proposed as shown on Figure 3-3 of the ES. The siting of solar PV panels and associated infrastructure seeks to minimise instances of development on both sides of PRoW. Where development is proposed adjacent to a PRoW, an offset of a minimum of 10m either side of the centre line has been incorporated. Where development is proposed on both sides of a PRoW, sections of wider offsets have also been integrated to avoid a 'canyon effect', and vary the extent of views experienced across the Principal Site where practicable.

SE5	Advice should be sought from Council's PRoW officer with relation to proposed diversions and PRoW management plan.		A PRoW Management Plan has been developed in accordance with discussions held with the Highways Authority at LCC and National Highways and is submitted with the DCO Application.
SE6	Baseline or assessment should include the grid connection corridor as well as principal site. Important to inform restoration of soils.		<p>An ALC Survey of the Cable Corridor has not been undertaken at this stage.</p> <p>Given the need to maintain flexibility in the cable corridor (e.g. because of the planning application recently submitted to North Kesteven District Council for the Brant Battery Energy Storage System proposed scheme (Reference Ref: 25/0533/FUL) and existing overhead lines), if any best and most versatile (BMV) land is detected, it will not be able to be avoided. However, when applying IEMA's significance criteria this will not constitute a significant effect. Therefore, it is not deemed essential to undertake this survey at this stage as it would not change the significance of effect or the location of the proposed infrastructure.</p> <p>This position has been discussed with Natural England in a meeting held on 20 February 2025.</p> <p>This approach aligns with other, consented solar NSIPs.</p>
SE7	Clarification required on BMV land and calculations reached regarding comparing to amount of BMV land in Lincolnshire.		Section 12-10 within Chapter 12: Socio Economics and Land Use addresses the amount of BMV land in Lincolnshire.
TT11	Concern with routing for HGVs accessing C-019 on a single lane track from A15 - LCC suggest access via C-018 used instead.		<p>HGV routing has been finalised, and the forecast vehicle numbers for both the Principal Site and Cable Corridor are detailed in Chapter 13 Traffic and Transport of the ES.</p> <p>Access C-019 has been moved and a new location has been agreed with the Highways Authority at LCC.</p>

TT12	Swept path analysis required to demonstrate narrow rural roads are suitable for use and informed by LCC as Highways Authority		<p>A meeting was held with LCC on 28 February 2025 regarding access and related swept path analysis, and following further email correspondence, the Highways Authority is satisfied with the proposed access arrangements.</p> <p>Details of the swept path analysis are included in the Framework Construction Traffic Management Plan (CTMP) as well as Annex A, B and C of the Framework CTMP submitted with the DCO Application.</p>
OT5	Encourage dialogue with Lincolnshire Fire and Rescue regarding Battery Safety.		<p>The Lincolnshire Fire and Rescue Services have been consulted in relation to the Proposed Development including the development of the Framework Battery Safety Management Plan. Furthermore, guidance from the National Fire Chiefs Council has been incorporated into the Framework Battery Safety Management Plan. Close consultation will continue with the Lincolnshire Fire and Rescue Services throughout the planning process.</p>
OT6	Waste Management Strategy encouraged to be produced as part of ES. LCC expects ongoing updates to any WMS produced.		<p>It was confirmed in a meeting with LCC held on 24 February 2025 that a standalone Waste Management Strategy is not required. The overall strategy is set out in the Framework CEMP, the Framework Operational Environmental Management Plan, Framework Decommissioning Environmental Management Plan and Chapter 14 Other Environmental Matters of the ES.</p>
OT7	Careful consideration required to operational waste.		<p>Operational waste is addressed in Chapter 14 Other Environmental Matters of the ES. During the operational stage, all management of waste will be in accordance with the relevant regulations and waste will be transported by licensed waste hauliers to waste management sites which hold the necessary regulatory authorisation and/or permits for those wastes consigned to them.</p>

OT8	Lincolnshire Fire and Rescue Services would welcome discussion to view transport strategy, better understand risks and procedures to mitigate risks.		The Lincolnshire Fire and Rescue Services have been consulted in relation to the Proposed Development, as set out in the Framework Battery Safety Management Plan submitted with the DCO. Consultation included a meeting with the Lincolnshire Fire and Rescue Services to share preliminary site plans, including discussion around emergency site accesses, which has informed the final design. Further consultation with the Lincolnshire Fire and Rescue Services allowed for the development of the Framework Battery Safety Management Plan – for example the Framework Battery Safety Management Plan has been developed in accordance with a table of design expectations/comments from the Lincolnshire Fire and Rescue Services (based on the National Fire Chiefs Council guidance), which included a number of transport-related items. Close consultation will continue with the Lincolnshire Fire and Rescue Services throughout the planning process.
OT9	LCC expects an Emergency Management Plan to be included within finalised ES.		An Emergency Response Plan is committed to within the Framework CEMP and will be produced post-consent as part of the final CEMP.
CU2	Consideration should be given to geographical scale of all other NSIP projects within Lincolnshire and adjacent authority areas.		This comment is noted and has been considered in the ES where appropriate, in particular in the assessment of cumulative effects of the Proposed Development with other solar schemes in Chapter 15: Cumulative Effects and Interactions of the ES as relevant.
CU3	Cumulative assessment of quarry sites to be reviewed in ES		Cumulative assessment of quarry sites has been updated and reviewed at ES stage and included in Chapter 15: Cumulative Effects and Interactions of the ES as relevant.

20 June 2025

Reference: EN010154

[REDACTED] - Lincolnshire Wildlife Trust

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Banovallum House
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Lincolnshire LN9 5HF

Dear [REDACTED],

**Fosse Green Energy- Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010154**

Fosse Green Energy Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (2008 Act) for a Development Consent Order (DCO) for Fosse Green Energy (the Proposed Development). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹.

Accordingly, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document. The purpose of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The PMIE, is separate from the Initial Assessment of Principal Issues (IAPI) identified by the Examining Authority (ExA), however it may influence the content of the IAPI. Further information on the purpose of the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.

The potential issues are elements of the Proposed Development that are not fully agreed with statutory bodies or local authorities, i.e. those matters with a RAG rating of Amber or Red. These have initially been identified through a review of responses to the Applicant's non statutory and statutory consultation, meetings and correspondence with Lincolnshire Wildlife Trust. The issues we have identified are set out in Appendix A of this letter. Each issue has been categorised with a RAG rating as defined in Table 1 below.

Table 1 RAG Ratings

	Low risk- highly likely to be resolved before the close of examination stage.
	Medium risk- likely to be resolved before the close of examination stage.
	High risk- unlikely to be resolved before the close of examination stage.

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus)

In order to prepare the PMIE, could you please let us know if you agree the status of the potential issues for the Proposed Development in relation Lincolnshire Wildlife Trust. Please add further rows to the table at Appendix A in case there are further issues you would like to identify prior to Examination. Please return a completed copy of this table to us by the 2 July 2025 via email at the following address: info@fossegreenenergy.co.uk

Please note that the PMIE document will also influence the content of the Statement of Common Ground that the Applicant hopes to enter into with you and which it will prepare in the pre-examination period, should the DCO Application be accepted by the Planning Inspectorate.

Responses to this letter will be published in the PMIE document that we submit as a DCO submission document. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully

Lloyd Sandles
Projects Director
Fosse Green Energy Limited
22 Grosvenor Gardens
London
United Kingdom
SW1W 0DH

Appendix A- Potential Main Issues for Examination with Lincolnshire Wildlife Trust

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG	Rationale
E1	Tunman Wood - permissive paths recommended to be positioned outside of site boundary of Tunman Wood. Recommendation to create an ecotone of two habitats outside the boundary of Tunman Wood to promote biodiversity.	Green	<p>The permissive paths around the edge of Tunman Wood that were shown on the layout plan at the Statutory Consultation stage have been removed.</p> <p>Whilst an ecotone is not proposed, there will be a 15m offset between the boundary of Tunman Wood and the site, with undeveloped areas to allow for natural regeneration of the woodland edge, ensure the health and longevity of vegetation and retain the existing structure of the landscape. Details of this are set out in the Framework Landscape and Ecological Management Plan, which is submitted as part of the DCO Application.</p>
E2	Habitat Creation and Enhancement - recommendation for modified grassland beneath the solar arrays rather than species rich.	Green	<p>Based on other solar schemes the target of modified grassland is more likely to be achieved between and under the panels.</p> <p>Opportunities exist in other open areas for targeting more species rich grassland. This will be further detailed within the Framework Landscape and Ecology Management Plan (FLEMP) to be submitted with the DCO Application. Areas of grassland proposed beneath the panels are shown in Figure 7.15-1: Landscape Mitigation Plans (to be submitted with the DCO Application.)</p>
E3	Biodiversity units should not be sold on to other development projects and should remain within this scheme contributing to the 'additionality' pillar of the BNG framework	Red	<p>Full details of the Biodiversity Net Gain (BNG) assessment are provided in the BNG assessment report to be submitted with the DCO Application. The delivery of BNG is secured under a Requirement in the draft Development Consent Order.</p>
E4	Ground nesting birds - concern regarding cumulative impact on ground-nesting birds and	Green	<p>Surveys for breeding and non-breeding birds, including ground nesting birds, have been undertaken across the DCO Site, the full</p>

	want to see considerable effort to minimise these impacts.	results of which are included in Appendix 8-G: Breeding Birds and Appendix 8-H: Non-breeding Birds of the Environmental Statement (ES). Cumulative effects on ground nesting birds is considered in Chapter 8 Ecology and Nature Conservation of the ES, which concludes that there will be no effects from cumulative developments which are similar in nature to the Proposed Development as a result of the mitigation included within the respective developments.
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20 June 2025

Reference: EN010154

[REDACTED] - National Highways
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Dear [REDACTED],

Fosse Green Energy- Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010154

Fosse Green Energy Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (2008 Act) for a Development Consent Order (DCO) for Fosse Green Energy (the Proposed Development). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹.

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The potential issues are elements of the Proposed Development that are not fully agreed with statutory bodies or local authorities, i.e. those matters with a RAG rating of Amber or Red. These have initially been identified through a review of responses to the Applicant's non statutory and statutory consultation, meetings and correspondence with National Highways. The issues we have identified are set out in Appendix A of this letter. Each issue has been categorised with a RAG rating as defined in Table 1 below.

Table 1 RAG Ratings

	Low risk- highly likely to be resolved before the close of examination stage.
	Medium risk- likely to be resolved before the close of examination stage.

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High risk- unlikely to be resolved before the close of examination stage.

In order to prepare the PMIE, could you please let us know if you agree the status of the potential issues for the Proposed Development in relation to National Highways. Please add further rows to the table at Appendix A in case there are further issues you would like to identify prior to Examination. Please return a completed copy of this table to us by the 2 July 2025 via email at the following address: info@fossegreenenergy.co.uk

Please note that the PMIE document will also influence the content of the Statement of Common Ground that the Applicant hopes to enter into with you and which it will prepare in the pre-examination period, should the DCO Application be accepted by the Planning Inspectorate.

Responses to this letter will be published in the PMIE document that will be submitted as a DCO submission document. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully

Lloyd Sandles
Projects Director
Fosse Green Energy Limited
22 Grosvenor Gardens
London
United Kingdom
SW1W 0DH

Appendix A- Potential Main Issues for Examination with National Highways

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG	Rationale
WE1	Further detail and consultation required on surface water drainage proposals.		Further detail on surface water drainage proposals for the Proposed Development is provided in the Drainage Strategy (Appendix 9-D of the Environmental Statement (ES)).
TT1	Site access – potential access direct to the A46 does not comply with DMRB guidance.		A direct access onto the A46 is no longer being considered for the Proposed Development, as a result of comments received from National Highways.
TT2	Cable route - potential interaction with A46 SRN		<p>It is proposed that a cable will be constructed under the A46 to connect the northern and southern parts of the Proposed Development. The Applicant is aware of the requirements of National Highways under CD622, and will address these post consent, should consent for the Proposed Development be granted. The Applicant is also currently negotiating Protective Provisions for the benefit of National Highways to cover interactions between the Proposed Development and National Highways' assets, to be included in the draft DCO.</p> <p>Chapter 13: Traffic and Transport of the ES will set out the forecasted construction traffic impacts as well as the proposed construction traffic management during the construction phase. Further details on how the A46 and other roads within the vicinity of the DCO Site will be managed to mitigate impacts will be set out in the Framework Construction Traffic Management Plan to be submitted as part of the DCO Application.</p>

TT3	Traffic model - confirmation required regarding data being factored up for the 2032 base year model.		As set out in Chapter 13: Traffic and Transport of the ES, three different survey years have been used for the assessment (2022, 2023 and 2025), which have each been factored up to the future baseline year of 2032 using growth factors extracted from TEMPro as agreed.
TT4	Construction - further details required on minibus service, including trip distribution figures and how construction worker traffic impacts on SRN are not underestimated. Query regarding modal split in Table 13-15 of PEI Report therefore further information and evidence required.		Details regarding the proposed minibus service, trip distribution and the construction staff vehicle split have been reviewed and confirmed for the assessment as part of the meeting with National Highways held in March 2025. Distribution and staff vehicle split (the modal split) was discussed during the latest meeting held with National Highways, meeting minutes are to be presented within Appendix 13-B of the Environmental Statement. During this meeting, no additional comments were raised.
TT5	SRN Junctions - HGV trip generation should be broken down into hourly two-way trips, with an assessment of how these trips will affect SRN junction. Evidence of how HGVs and non-HGVs will be distributed across the SRN required.		As set out in Chapter 13: Traffic and Transport of the ES, forecast HGV trips have been broken down into hourly two-way trips, and the distribution of HGV and non-HGV trips along the SRN (A46) split across different routes dependent on where the works across the Principal Site are taking place as different zones utilise different vehicle routing. The HGV trip window has been adjusted to eight hours (09:00-17:00) so that no trips occur within the SRN during the traditional AM and PM network peaks. During the assessed AM and PM development peaks, the assessment also indicates that there are Negligible impacts for all link and junction receptors in the SRN.
TT6	Significant effect - Disagreement that no significant effects are expected at A46 east and west of Halfway House Roundabout, A46 East of Fosse Lane and A46 slip roads with Fosse Lane.		Further commentary and analysis on trip generation and distribution and the modal split (in particular the A46) is presented within Chapter 13: Traffic and Transport of the ES, and supporting appendices which includes traffic flow diagrams for the whole study area. Chapter 13: Traffic and Transport of the ES concludes that there are no residual significant effects of the Proposed Development on any

			of the Traffic and Transport receptors in the construction and decommissioning phase, including at the A46 east and west of the Halfway House Roundabout, the A46 East of Fosse Land and the A46 slip roads with Fosse Lane. See Section 13.4 and 13.7 of Chapter 13: Traffic and Transport of the ES, Appendix 13-C: Traffic and Transport Significance Assessment Summary and Appendix 13-D: Receptor Traffic Flow Tables submitted with the DCO Application.
TT7	Consultation required on Traffic Flow Diagram to inform whether a junction capacity assessment is required.		<p>Chapter 13: Traffic and Transport of the ES and its and supporting appendices presents commentary and analysis on trip generation and distribution and the modal split (in particular the A46) which includes traffic flow diagrams for the whole study area. During the consultation with National Highways it was stated that the trips generation would be robust and there would be no development trips in the standard network peak which would trigger the need for further junction capacity assessments.</p> <p>See Section 13.4 and 13.7 of Chapter 13: Traffic and Transport of the ES, as well as Appendix 13-C: Traffic and Transport Significance Assessment Summary and Appendix 13-D: Receptor Traffic Flow Tables to be submitted with the DCO Application.</p>
TT8	Consultation required on methodology to assess cumulative impacts during the peak construction period.		The cumulative assessment and list of schemes was discussed in the meeting held on 7 March 2025 and the approach agreed.
TT9	Engagement required regarding protective provisions with National Highways legal team.		Engagement on Protective Provisions is underway and ongoing with National Highways' legal team.

TT10	Consultation required to agree contents of Construction Traffic Management Plan (CTMP).		A Framework CTMP has been produced which includes all the information requested by National Highways and will be submitted with the DCO Application.
OT1	Lighting - consultation required on external lighting details		Details of proposed lighting is provided in Chapter 3: Proposed Development of the ES which will be submitted as part of the DCO Application.
OT2	Glint and Glare - recommendation to model two heights to adequately predict effects on drivers of HGVs and inclusion of glint and glare mitigation in Landscape and Ecological Management Plan.		The glint and glare model used in the Environmental Statement has been run at 1.5m in height and it also assesses the visibility at 2.5m in height. This incorporates everything that would be using a road, including HGVs. Within the assessment presented in Chapter 14: Other Environmental Topics of the ES, mitigation has been proposed such that there is enough coverage during the times of year where the potential for glare impacts may occur on road users including HGVs.
LV16	Boundary treatments and landscaping – National Highways should be consulted on boundary treatments and a landscaping plan should set out boundary treatments near to the network. All boundary treatments should be located within the site and not encroach on National Highways land.		Boundary treatments related to the Proposed Development do not encroach on land owned by National Highways. Details of boundary treatments and landscaping are providing in Chapter 10: Landscape and Visual Amenity and secured in the Framework Landscape and Ecological Management Plan. The Landscape Masterplan (as presented in Annex A of the Framework Landscape and Ecological Management Plan) provides details of the landscaping measures provided throughout the Site.

20 June 2025

Reference: EN010154

[REDACTED] - Natural England

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CW1 6GJ

Dear [REDACTED],

Fosse Green Energy- Potential Main Issues for Examination

Planning Inspectorate Case Reference: EN010154

Fosse Green Energy Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (2008 Act) for a Development Consent Order (DCO) for Fosse Green Energy (the Proposed Development). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹.

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Table 1 RAG Ratings

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High risk- unlikely to be resolved before the close of examination stage.

In order to prepare the PMIE, could you please let us know if you agree the status of the potential issues for the Proposed Development in relation to Natural England. Please add further rows to the table at Appendix A in case there are further issues you would like to identify prior to Examination. Please return a completed copy of this table to us by the 2 July 2025 via email at the following address: info@fossegreenenergy.co.uk

Please note that the PMIE document will also influence the content of the Statement of Common Ground that the Applicant hopes to enter into with you and which it will prepare in the pre-examination period, should the DCO Application be accepted by the Planning Inspectorate.

Responses to this letter will be published in the PMIE document that will be submitted as a DCO submission document. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully

Lloyd Sandles
Projects Director
Fosse Green Energy Limited
22 Grosvenor Gardens
London
United Kingdom
SW1W 0DH

Appendix A- Potential Main Issues for Examination with Natural England.

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG	Rationale
SE1	Agricultural Land Classification (ALC) - Recommendation that survey of entire site boundary should be undertaken including the cable corridor.	R	<p>An ALC Survey of the Cable Corridor has not been undertaken at this stage.</p> <p>Given the need to maintain flexibility in the cable corridor (e.g. because of the planning application recently submitted to North Kesteven District Council for the Brant Battery Energy Storage System (Reference Ref: 25/0533/FUL) and existing overhead lines), if any best and most versatile land is detected, it will not be able to be avoided. However, when applying IEMA's significance criteria this will not constitute a significant effect. Therefore, it is not deemed essential to undertake this survey at this stage as it would not change the significance of effect or location of the Proposed Development's Cable Corridor. This approach aligns with other, consented solar NSIPs.</p> <p>This position has been discussed with Natural England in a meeting held on 20 February 2025.</p>

20 June 2025

Reference: EN010154

[REDACTED] - National Grid Electricity Transmission

Email: [REDACTED]@nationalgrid.com
Email: box.NG.ETInnovation@nationalgrid.com
Address: National Grid Electricity Transmission
1-3 Strand
London
WC2N 5EH

Dear [REDACTED],

**Fosse Green Energy- Potential Main Issues for Examination
Planning Inspectorate Case Reference: EN010154**

Fosse Green Energy Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (2008 Act) for a Development Consent Order (DCO) for Fosse Green Energy (the Proposed Development). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹.

Accordingly, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document. The purpose of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The PMIE, is separate from the Initial Assessment of Principal Issues (IAPI) identified by the Examining Authority (ExA), however it may influence the content of the IAPI. Further information on the purpose of the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.

The potential issues are elements of the Proposed Development that are not fully agreed with statutory bodies or local authorities, i.e. those matters with a RAG rating of Amber or Red. These have initially been identified through a review of responses to the Applicant's non statutory and statutory consultation, meetings and correspondence with National Grid Electricity Transmission. The issues we have identified are set out in Appendix A of this letter. Each issue has been categorised with a RAG rating as defined in Table 1 below.

Table 1 RAG Ratings

	Low risk- highly likely to be resolved before the close of examination stage.
	Medium risk- likely to be resolved before the close of examination stage.

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus)

High risk- unlikely to be resolved before the close of examination stage..

In order to prepare the PMIE, could you please let us know if you agree the status of the potential issues for the Proposed Development in relation to National Grid Electricity Transmission. Please add further rows to the table at Appendix A in case there are further issues you would like to identify prior to Examination. Please return a completed copy of this table to us by the 2 July 2025 via email at the following address: info@fossegreenenergy.co.uk

Please note that the PMIE document will also influence the content of the Statement of Common Ground that the Applicant hopes to enter into with you and which it will prepare in the pre-examination period, should the DCO Application be accepted by the Planning Inspectorate.

Responses to this letter will be published in the PMIE document that will be submitted as a DCO submission document. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully

Lloyd Sandles
Projects Director
Fosse Green Energy Limited
22 Grosvenor Gardens
London
United Kingdom
SW1W 0DH

Appendix A- Potential Main Issues for Examination with National Grid Electricity Transmission

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG	Rationale
OT3	Utilities - Requirement for consultation and engagement regarding existing overhead lines (4ZM 400kV OHL (Bicker Fen-Spalding North-West Burton / Bicker Fen-Walpole-West Burton).		Engagement is ongoing with all statutory undertakers with apparatus that has the potential to be affected by the Proposed Development in order to agree protective provisions to be included in the DCO. The Applicant is currently in discussions with NGET's legal team to agree protective provisions for the benefit of NGET in the draft DCO.

24 June 2025

Reference: EN010154

[REDACTED] - North Kesteven District Council

Email: [REDACTED]@n-kesteven.gov.uk

Address: North Kesteven District Council
Kesteven Street
Sleaford
NG34 7EF

Dear [REDACTED],

Fosse Green Energy- Potential Main Issues for Examination

Planning Inspectorate Case Reference: EN010154

Fosse Green Energy Limited (the Applicant) is proposing to submit an application under section 37 of the Planning Act 2008 (as amended) (2008 Act) for a Development Consent Order (DCO) for Fosse Green Energy (the Proposed Development). We are writing to you to identify the Potential Main Issues for Examination in accordance with following guidance: Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus, May 2024 (Updated September 2024)¹.

Accordingly, the Applicant is preparing a Potential Main Issues for Examination (PMIE) document. The purpose of the PMIE document is to facilitate more robust preparation for examination and a smoother and more proportionate examination experience for all parties. The PMIE, is separate from the Initial Assessment of Principal Issues (IAPI) identified by the Examining Authority (ExA), however it may influence the content of the IAPI. Further information on the purpose of the PMIE document can be found at this link: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus>.

The potential issues are elements of the Proposed Development that are not fully agreed with statutory bodies or local authorities, i.e. those matters with a RAG rating of Amber or Red. These have initially been identified through a review of responses to the Applicant's non statutory and statutory consultation, meetings and correspondence with North Kesteven District Council. The issues we have identified are set out in Appendix A of this letter. Each issue has been categorised with a RAG rating as defined in Table 1 below.

Table 1 RAG Ratings

Green	Low risk- highly likely to be resolved before the close of examination stage.
Yellow	Medium risk- likely to be resolved before the close of examination stage.
Red	High risk- unlikely to be resolved before the close of examination stage.

¹ [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK](https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus)

In order to prepare the PMIE, could you please let us know if you agree the status of the potential issues for the Proposed Development in relation to North Kesteven District Council. Please add further rows to the table at Appendix A in case there are further issues you would like to identify prior to Examination. Please return a completed copy of this table to us by the 4 July 2025 via email at the following address: info@fossegreenenergy.co.uk

Please note that the PMIE document will also influence the content of the Statement of Common Ground that the Applicant hopes to enter into with you and which it will prepare in the pre-examination period, should the DCO Application be accepted by the Planning Inspectorate.

Responses to this letter will be published in the PMIE document that will be submitted as a DCO submission document. If we do not receive a response, this will be stated in the PMIE document.

Yours faithfully

Lloyd Sandles
Projects Director
Fosse Green Energy Limited
22 Grosvenor Gardens
London
United Kingdom
SW1W 0DH

Appendix A- Potential Main Issues for Examination with North Kesteven District Council (NKDC)

Table 2 Potential Main Issues for Examination

Ref	Issue	RAG	Rationale
TP7	Concern regarding 60-year timeframe - further dialogue required.		<p>A 60 year time limited consent is being sought to maximise the renewable energy generation of the Proposed Development and to allow for the replacement of panels halfway through if there is a loss in output capacity. A 60 year time period also allows flexibility for a technological leap in PV arrays after a few decades should it be available. The operational life of the Proposed Development is anticipated to be 2033 to 2093.</p> <p>Furthermore, the Proposed Development is referred to as a long term, reversible development throughout the Environmental Statement (ES).</p>
ALT2	Not clearly explained how the sequential and exception test has been applied and used to inform site selection.		<p>This is demonstrated in the Site Selection Report to be submitted as part of the DCO Application (Appendix A to the Planning Statement). Areas of land in Flood Zones 2 and 3 were initially excluded in the site selection assessment in order to ascertain if an unconstrained site could deliver the Proposed Development, with land at lower risk of flooding (Flood Zone 1) only being considered for proposed infrastructure at this stage.</p> <p>As a suitable site could not be identified, sites subject to constraints were re-introduced into the site selection assessment, including areas within Flood Zones 2 and 3. Given the approach taken, it has been demonstrated that the sequential test has been considered in site selection.</p> <p>The Planning Statement explains how the sequential and exception tests are met at a site specific level.</p>

EIA1	Further clarification required on the process of replacement to both the PV and larger equipment on Site throughout life of development.		Further detail is provided in Chapter 3: The Proposed Development of the ES which sets out that during operation it is anticipated that maintenance and servicing would include the inspection and, if required, renewal and removal, reconstruction, refurbishment or replacement of faulty or broken equipment, but not the removal, reconstruction or replacement of all panels at the same time. If full panel and BESS replacement is required at some point during the lifetime of the Proposed Development, activity would be phased.
CL1	Consideration should be given to impact on Climate Change of waste panels due to intermediate component replacement.		The greenhouse gas (GHG) assessment within Chapter 6: Climate Change of the ES addresses the replacement and disposal of panels. Embodied emissions and waste disposal due to replacements are presented in the operational assessment of effects in Section 6.4.49 onwards (in line with Chapter 14: Other Environmental Topics, Section 14.5 Materials and Waste), assuming replacement after 30 years and 10% for ad hoc replacements.
CL2	Latest carbon factors to be used in the ES.		The latest emission factors from the Inventory of Carbon and Energy (ICE) V4.0 database and the UK Department of Energy Security and Net Zero (DESNZ) greenhouse gas reporting 2024 are used in the assessment calculations in Chapter 6: Climate Change of the ES. A review of Environmental Product Declarations (EPDs) and best available data for electronic components has formed part of the GHG assessment.
CH16	Disagree with approach that focuses on assets of 'highest value' which appears subjective and unsubstantiated. As a result, assets within the study area have not been considered or assessed. Separate table or appendix recommended.		Historic England's Scoping Report Consultation Response confirmed the suitability of the approach to the Study Areas and further information is provided in Chapter 7: Cultural Heritage of the ES and accompanying Figures 7-1-7-3. The assessment has considered both designated and non-designated heritage assets and buried archaeology.

CH17	Engagement required with Conservation Officer following the PEIR.		<p>The detailed responses to Scoping and the Preliminary Environmental Information Report from the Conservation Officer were welcomed. All comments have been addressed in Chapter 7: Cultural Heritage of the ES.</p> <p>There are no material issues that would warrant further discussions or meetings therefore further engagement is not considered necessary. Appropriate study areas were discussed and agreed with Historic England through consultation. See consultation details in Chapter 7: Cultural Heritage of the ES.</p>
CH18	Requested 5km study area. Further consultation required with CO to agree study area.		<p>The study areas considered in Chapter 7: Cultural Heritage of the ES align with other solar farm schemes in Lincolnshire. Applying a greater study area for both designated and non-designated assets would scope in thousands of heritage assets and is not considered proportionate. A 5km study area has been applied for designated assets of highest significance around the Principal Site. Historic England's Scoping Report Consultation Response confirmed the suitability of the approach to the Study Areas. It should be noted that there are no heritage assets beyond 1km of the DCO Site which would be subject to any harm from the Proposed Development, as set out in Chapter 7: Cultural Heritage of the ES, and so accordingly there would be no potential for cumulative effects in relation to Cumulative Schemes in combination with the Proposed development at this distance. All comments have been addressed in Chapter 7: Cultural Heritage of the ES. There are no material issues that would warrant further discussions / meetings therefore further engagement is not considered necessary.</p>

CH19	Further consultation welcomed regarding reliance on embedded mitigation covering any eventualities.		<p>Embedded mitigation comprises measures that form part of the design of the Proposed Development which have been incorporated in order to reduce impacts on a range of receptors including known heritage assets. Examples include setbacks from Listed Buildings, vegetation planting and improvements or excluding complex archaeological remains from the design and thereby avoiding any related impacts.</p> <p>The assessment has been undertaken on the assumption that the embedded mitigation is applied and before later mitigation is introduced. This process results in no significant residual effects as presented in Chapter 7: Cultural Heritage of the ES.</p>
WE20	Sequential test: Contradiction between paragraphs 6.1.2 and conclusions in Paragraphs 2.2.50 and 6.1.10 regarding sequential test. Query regarding compliance with requirements on EN-1 and NPPF with respect to sequential test.		<p>The Flood Risk Assessment has been updated for the ES. Appendix 9-C: Flood Risk Assessment of the ES provides the updated version of the Flood Risk Assessment, which includes an explanation regarding the sequential and exception tests. The Planning Statement also provides an explanation of the sequential test and exception test at the site selection stage, and at the site level.</p>
WE21	Recommendation to include a figure in the ES which overlays areas of solar, solar stations, BESS and on site substation across flood risk information to appreciate how scheme design has sought to avoid areas of high flood risk		<p>With the exception of solar panels, no above ground solar infrastructure is proposed within Flood Zones 2 and 3.</p>
LV15	Further consultation recommended with the Council's Landscape Consultant following PEIR Consultation and prior to ES Preparation		<p>Further meetings and email exchange has occurred since the production of the Preliminary Environmental Information Report and Statutory Consultation, and prior to preparation of the ES.</p>
NV2	Consultation welcomed with Environmental Health Officers following PEIR Consultation and prior to ES being prepared to understand		<p>–A meeting was held with the Environmental Health Officers on 27 February 2025 to discuss the reduction of noise impacts, and no follow up actions were identified.</p>

	how it is intended to reduce significant noise impacts.		
SE8	Amendments to be made to NPP reference in Chapter for ES		The appropriate amendment has been made to the ES.
SE9	Need to ensure Soil Management Plans remain robust for 60 year life span		The Framework Soil Management Plan submitted with the DCO Application, has been amended to reflect the 60 year operational life of the Proposed Development.
SE10	Further information required on economic impact - e.g. farm businesses.		Further information on the economic impact of the Proposed Development is set out within Chapter 12: Socio Economics and Land Use of the ES.
SE11	Amendment required to numbers of Agricultural Land Class in PEIR Chapter and Appendix - to rectify for ES		The appropriate amendment has been made to the ES.
SE12	Review impact of the construction phase on availability of serviced accommodation, NKDC suggest proportionally greater than reported in PEIR		The impact on the availability of serviced accommodation during the construction phase has been reviewed and the assessment is presented in Chapter 12: Socio Economics and Land Use of the ES.
SE13	Confirmation required on how the value of £21.3m has been derived for proportion of construction spend contracted locally. What proportion of total spend on construction will be contracted locally, what criteria will be used to encourage local companies to apply for contracts.		Gross Value Added (GVA) is a measure of the value of what the labour force produces, the output it generates within a geography, which would be that within the Proposed Development itself during construction in this context. Estimated GVA per construction worker (£21.3m in the Study Area) has been derived from identifying total output from the ONS Labour productivity by region by industry dataset for 2022 for the East

			<p>Midlands and dividing this by jobs in the construction industry in the same region reported by the Business Register Employment Survey. The East Midlands is considered the appropriate benchmark for the local 60-minute Study Area, as data is published at this level rather than the more granular, LSOA-derived, Study Area itself; this approximates to local benefit. The approach ensures that the assessment reflects the direct economic contribution of the Proposed Development, particularly in terms of employment and productivity within the construction sector. This aligns with industry best practices for measuring economic impact, as it allows for a precise evaluation of the Proposed Development's contribution to job creation and economic output.</p> <p>The assessment of GVA per construction worker is not a reflection of the proportion of construction spend to be contracted locally. A Framework Employment, Skills and Supply Chain Plan will be submitted as part of the DCO application which details the opportunities for local companies during the construction phase to apply for contracts. Whilst it is not readily possible to estimate spend procured locally as this will depend on the appointed contractor's procurement and availability of materials, the Plan will serve to maximise the proportion of total spend on construction contracted from local companies including from such businesses engaged in, for example, production and/or supply of fencing and civil materials.</p>
SE14	Why has LM3 modelling not been used		<p>The assessment presented in Chapter 12: Socio Economics and Land use of the ES, aligns with other assessments of economic impacts on solar projects across England.</p>
SE15	Request for Skills Employment and Supply Chain Management Plan to be produced.		<p>An Framework Employment, Skills and Supply Chain Plan has been prepared and will be submitted with the DCO Application.</p>

SE16	Consultation with Council's economic development officers would be welcomed following PEIR consultation and prior to ES being prepared		Comments received from NKDC during Statutory Consultation have been considered within the assessment presented within Chapter 12: Socio Economics and Land Use of the ES.
TT12	Swept path analysis required to demonstrate narrow rural roads are suitable for use and informed by LCC as Highways Authority		<p>A meeting was held with Lincolnshire County Council on 28 February 2025 regarding access and related swept path analysis, and following further email correspondence, the Highways Authority is satisfied with the proposed access arrangements.</p> <p>Details of the swept path analysis are included in the Framework Construction Traffic Management Plan, as well as Annex A, B and C of that Plan, which is submitted with the DCO Application.</p>
OT4	Waste - further information required on waste management, regarding waste battery storage and recycling of solar panels		<p>The overarching waste management strategy, including applying the waste hierarchy and designing out waste as per circular principles, is covered in: Chapter 14: Other Environmental Topics and the Framework Construction Environmental Management Plan, Framework Operation Environmental Management Plan and Framework Decommissioning Environmental Management Plan.</p> <p>Discussions took place with Lincolnshire County Council, as the waste authority on waste matters on 24 February 2025, as detailed in Chapter 14: Other Environmental topics of the ES.</p>
OT10	Mechanisms should be in place to ensure implementation of planting is successful and can survive duration of development. Also should be included as part of landscaping assessment in Chapter 10.		<p>A Framework Landscape and Ecological Management Plan has been prepared and will be submitted with the DCO Application which provides details of the planting proposed for the Proposed Development. Habitats will be monitored, in line with the management prescriptions set out in Section 5 of the Framework Landscape and Ecological Management Plan, to ensure correct establishment and growth is achieved, and remedial action (such as</p>

			re-seeding if establishment fails) would be taken as relevant to ensure implementation of planting is successful and planting remains throughout the duration of the development.
CU4	Note to assess Navenby Substation when information is available within the ES	Yellow	The proposed National Grid substation at Navenby has not been submitted at the time of ES preparation. However, this will be kept under review as further information should be available at examination stage.
CU5	Recommended amendments to long/short lists	Green	The recommended amendments from NKDC to the long and short lists, which form the basis of the cumulative effects assessment, have been included. Chapter 15 Cumulative Effects and Interactions of the ES presents the cumulative effects assessment.
DS1	Orchards proposed next to NW04, W03 and W04 - clarification required as to whether these would be managed by the Applicant for BNG or offered to the Parish Council for a Community Orchard	Yellow	The proposed community orchards would be managed by the Applicant; however the Applicant is happy to discuss the transfer of management of the community orchard with the Parish Council although recognises that there may be limitations related to cost and operational management.
DS2	Recommendation to remove field NE02 from Scheme	Green	Field NE02 has been removed from the Proposed Development following feedback received during Statutory Consultation.
DS3	Suggest relocating Solar Stations in proximity to Public Rights of Way (PRoW) further away.	Green	Appropriate buffers have been implemented in the Proposed Development, and reflected in the Works Plans, ensuring solar infrastructure is sufficiently offset from PRoWs.