The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Fosse Green Energy

Case Reference: EN010154

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

25 July 2023

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1. INTRODUCTION

1.0.1 On 19 June 2023, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Fosse Green Energy Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Fosse Green Energy project (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.

1.0.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:

http://infrastructure.planninginspectorate.gov.uk/document/EN010154-000011

1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.

1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.

1.0.6 The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, including Advice Note 7: *Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping* (AN7). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.0 Description of the Proposed Development

(Scoping Report Section 3)

ID	Ref	Description	Inspectorate's comments
2.0.0	-	Options	The Scoping Report identifies several options that remain under consideration within the design and that the Applicant intends to maintain flexibility within the Development Consent Order to allow for developing technologies in, for example, battery storage and solar panel design. The Inspectorate expects that at the point an application is made, the description of the Proposed Development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the Proposed Development. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development. The description should be supported (as necessary) by figures, cross-sections, and drawings which should be clearly and appropriately referenced. Where flexibility is sought, the ES should clearly set out the design parameters that would apply and how these have been used to inform an adequate assessment in the ES.
2.0.1	Paragraph 3.2.28	Temporary and permanent infrastructure	The Scoping Report refers in places to 'temporary works' without defining the durations or phases these refer to. The ES should be clear, for the purposes of the assessment, which elements of the Proposed Development are considered to be temporary, and which are considered permanent features for all phases of development. Indicative timescales should be provided for all temporary works.
2.0.2	Paragraph	Existing utilities infrastructure	The design presented within the ES should demonstrate consideration of the locations of existing transmission infrastructure. Attention is

ID	Ref	Description	Inspectorate's comments
	3.2.40		drawn to the comments from National Grid that mitigation plans should demonstrate consideration of the use of low growing trees and shrubs around existing overhead lines.
2.0.3	Figures 2-1a and 2-1b	Design development and environmental constraints	The Scoping Report describes that the numbers and configuration of different elements of the design would be influenced by technical and environmental factors. The Inspectorate notes the presence of numerous environmental constraints within areas proposed for the Solar and Energy Storage Park, for example, large areas of land within Flood Zone 3 and the proximity of the Proposed Development to existing settlements such as the village of Thurlby. The ES should demonstrate how the presence of these constraints has been taken into account within the design of the Proposed Development and how any choices made on siting, use of particular technologies, types, scale and layout of the Solar and Energy Park have been influenced by environmental factors. The ES should also demonstrate how identified environmental effects, including cumulative effects, have been reduced or eliminated through the iterative design process with reference to the mitigation hierarchy where appropriate.
2.0.4	Table 3-1	Minimum distances to landscape and ecological features	The ES should justify the reasons for the selection of any buffer distances provided within the design from sensitive landscape and ecological features. Consideration should be given to maintaining buffers during construction as well as operation in order to protect sensitive receptors. The mechanisms for maintaining these buffers should also be contained within the outline management plans provided within the ES and secured through the Development Consent Order (DCO). Stated buffer distances from watercourses should also be taken from the top of the watercourse bank.

ID	Ref	Description	Inspectorate's comments
2.0.5	Paragraph 3.2.43	Construction plant and machinery	The ES should set out the types and numbers of plant and machinery assumed for the construction phase of both the Solar and Energy Park and the grid connection corridor within the assessment.

2.1 EIA Methodology and Scope of Assessment

(Scoping Report Chapters 4 to 17)

ID	Ref	Description	Inspectorate's comments
2.1.1	-	Assessment of options	The Inspectorate considers that there is potential for the options that are currently still under consideration – such as overhead lines or underground cabling across three different potential routes - to give rise to very different environmental effects. The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The parameters should use the maximum envelope within which the built development may be undertaken to ensure a worst-case assessment. The ES should identify the parameters that have been assumed as the worst-case scenario for each aspect scoped in to the assessment and ensure that interactions between aspects are taken into account relevant to those scenarios. The development parameters should be clearly defined in the draft DCO and in the accompanying ES. The Applicant, in preparing an ES, should consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so

ID	Ref	Description	Inspectorate's comments
			wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.
2.1.2	Paragraphs 3.2.41 3.2.47	Habitat creation	The ES should clearly differentiate between habitat creation and green infrastructure provided as mitigation for environmental effects or as compensation measures in the EIA. This should be set out separately from the stated aim for the Proposed Development to provide 10% biodiversity net gain.
2.1.3	Paragraphs 3.2.43	Appropriate baseline	The Inspectorate notes that the anticipated programme is for construction to commence in 2031 and operation in 2033. The ES should therefore clarify how the future baseline will be defined and how any changes to the baseline will be identified given the timescales to construction.
2.1.4	Paragraphs 3.2.43 6.4.5	Construction programme and assessment years	The Scoping Report identifies that there will be several construction compounds set up across the Solar and Energy Storage Park during the construction phase. The landscape and visual impact assessment (Scoping Report Chapter 11) indicates that there could be some overlap of construction activities within different solar plots. The ES should set out the worst – case assessment years that have been assumed for the assessment. Where there is potential for construction activities to occur across several sites simultaneously this should be considered to ensure a worst-case assessment is provided. Where different aspect assessment define different assessment years, the reasons for the selection of assessment years should be clearly explained in each case.
2.1.5	Paragraphs 3.2.50 3.2.53	Decommissioning	The Scoping Report states that an operational lifespan would not be specified in the application and that a time limited consent would not be sought. However, it also states that the solar panels would be

ID	Ref	Description	Inspectorate's comments
			designed to be operational for 40 years which could be extended if the panels continue to provide viable renewable energy. The ES needs to be clear as to whether decommissioning is to take place after 40 years or whether components are likely to be replaced to extend the lifespan of the development. Should components be replaced to extend the lifespan of the Proposed Development, the scale of this (particularly in the case of a comprehensive refurbishment of panels) and the likely significant effects should be assessed. The ES should clearly set out how decommissioning is to be assessed and any components which may remain following decommissioning. The Inspectorate would expect to see decommissioning secured through the inclusion of an Outline Decommissioning Plan or similar submitted with the Application.
2.1.6	-	Future baseline	In light of the number of ongoing developments within the vicinity of the Proposed Development, the ES should clearly state which developments will be assumed to be under construction or operational as part of the future baseline.
2.1.7	Paragraphs 4.1.3 4.2.1	Consideration of alternatives	The ES should provide full details of alternative sites, layouts and energy generation technologies considered for the Proposed Development. This should include a comparison of the environmental effects.
2.1.8	Paragraphs 6.6.8	Cumulative effects	The cumulative effects assessment within the ES should not be limited by the current proposed 5km search area used to identify potential projects for the assessment. The Applicant should seek to agree an appropriate study area, methodology for the cumulative effects assessment and the list of projects that should be assessed with relevant consultation bodies. This should include but not be limited to consideration of other solar farm developments coming forward in the local area. Developments considered in the cumulative

ID	Ref	Description	Inspectorate's comments
			effects assessment should also be presented on an appropriate figure in the ES for ease of reference.
2.1.9	Chapter 16	Structure of the ES	The ES should contain an outline of the proposed Construction, Operation and Decommissioning Management Plans. This should include details of the measures proposed to manage, control and remedy any identified environmental effects.
2.1.10	Chapter 17	Summary	The Inspectorate notes that some matters that have been proposed to be scoped out of the assessment have been omitted from Table 17-1 (Scope of Technical Topics and Elements to be Scoped Out). The Applicant should ensure there is consistency in any conclusions that are presented across chapters in the ES to aid understanding and readability. Please see ID 3.8.6 of this Scoping Opinion for the Inspectorate's comments on Table 17-1.
2.1.11	Appendix A	Transboundary Effects	The Inspectorate on behalf of the Secretary of State (SoS) has considered the Proposed Development and concludes that it is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the Proposed Development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision.

ID	Ref	Description	Inspectorate's comments
			The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Note Twelve, available on our website at http://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

3. ENVIRONMENTAL ASPECT COMMENTS

3.0 Climate Change

(Scoping Report Chapter 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.0.0	Table 7-2	In-combination climate change impact assessment	The Scoping Report proposes to scope out an assessment of the combined impact of the Proposed Development and future climate change on the receiving environment. The Inspectorate agrees that the Proposed Development is not likely result in significant in-combination impacts relating to changes in wind patterns and this matter can therefore be scoped out of the assessment. However, the Inspectorate considers there is insufficient evidence in relation to temperature, precipitation change and sea level rise to scope these matters out of the assessment at this stage. Given part of the Proposed Development lies within the Witham Washlands Flood Storage Area, the Inspectorate considers there is potential for in-combination effects with the Proposed Development and likely future changes in precipitation. These matters should be assessed in the ES.
3.0.1	Table 7-3	Climate change resilience – sea level rise	The Scoping Report states that the Proposed Development is not located in an area susceptible to sea level rise. The Planning Inspectorate considers that in the absence of tidal flood modelling through the lifetime of the Proposed Development to demonstrate that the Proposed Development would not be affected, this matter cannot be scoped out of the assessment at this stage. Subject to the provision of an evidence-based justification that considers the whole lifetime of the Proposed Development, however, this matter could be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.0.2	Table 7-4	Greenhouse Gas (GHG) Emissions assessment methodology	The Scoping Report sets out the criteria that will be used in the GHG Emissions assessment to determine the significance of effect. Table 7-4 sets out the significance criteria and refers to guidance from the Institute of Environmental Management and Assessment (2022). The Inspectorate notes that Table 7-4 does not completely align with the stated guidance in relation to the significance of 'minor adverse' effects. The ES should ensure that where guidance is used to inform the assessment methodology, that it is clear how it has been applied and, where differences occur in the approach, that reasons are given for any proposed change.
3.0.3	-	Greenhouse gas emissions and design flexibility	Where flexibility is being sought on the types of panels or batteries within the Proposed Development, the ES should present a worst-case assessment for the options under consideration.
3.0.4	Paragraph 7.5.8	Liaison with consultation bodies	The ES should seek to agree the approach to the climate change assessment with relevant consultation bodies.

3.1 Cultural Heritage

(Scoping Report Chapter 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.1.2	Paragraph 8.2.1	Study areas	The Inspectorate considers that the study areas used for the assessment should be illustrated on an appropriate figure within the ES. 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.
3.1.3	Paragraph 8.4.27	World War II crash site	The Scoping Report identifies a World War II aeroplane crash site as asset reference MLI98924. This site is mentioned in the text as occurring within the study area for the assessment, but the Inspectorate could not locate it on the associated figures. The ES should ensure that any references made to sites within the text can be easily located on appropriate figures for ease of reference.
3.1.4	Section 8.6 Paragraph 8.6.12	Assessment methodology	As well as considering the effects of the Proposed Development on individual heritage assets, the assessment should also consider the potential for interrelationships between heritage assets within the wider landscape in the assessment of significant effects. Site walkover surveys should therefore consider not only the intervisibility of the Proposed Development on individual heritage assets, but also the wider context within which they are experienced.

ID	Ref	Description	Inspectorate's comments
3.1.5	Paragraphs 8.6.13 8.6.14	Assessment results	The ES should contain information on how the results of the desk based and field-based assessments and surveys have informed the ongoing design development and supported the design of an appropriate mitigation strategy.
3.1.6	Paragraphs 8.6.14	Archaeological trial trenching	Where trial trenching is proposed to inform the baseline for the assessment, the need for, methodology, extent and coverage of trial trenches should be agreed in advance with relevant consultation bodies, including North Kesteven District Council's archaeological advisor. This should include preparation of a Written Scheme of Investigation.
3.1.7	-	Heritage Impact Assessment	A Settings Assessment/Heritage Impact Assessment should demonstrate an understanding of the significance and context of each of the assets in order to assess the impact of the Proposed Development and propose mitigation.

3.2 Ecology and Biodiversity

(Scoping Report Chapter 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Paragraph 9.7.1	Internationally and nationally designated statutory ecological designations – construction and operation	The Scoping Report identifies that there are no Sites of Special Scientific Interest (SSSI) designated within the 2km study area, and no internationally designated sites within 10km (or sites designated for mobile species such as bats within 30km) of the Proposed Development. However, the water environment chapter of the Scoping Report identifies potential hydrological linkages between the Proposed Development and Swanholme Lakes SSSI, 4.2km northeast of the Proposed Development. The Inspectorate does not agree therefore that effects on nationally designated ecological sites can be scoped out of the assessment at this stage until evidence that no pathway exists between the Proposed Development and Swanholme Lakes SSSI. Appropriate cross reference should therefore be made in the ES between the ecology and biodiversity and water environment assessments in the ES.
3.2.2	Paragraph 9.7.2	Aquatic invertebrates - operation	The Scoping Report states that there is some evidence that some species of aquatic invertebrates can be attracted to solar panels. The Scoping Report proposes to scope out the effects on aquatic invertebrates attracted to solar panels on the basis that there are no statutory sites designated for aquatic invertebrates within 1km of the Proposed Development. The Inspectorate notes however that Whisby Nature Park Local Nature Reserve lies within 500m of the Solar and Energy Storage Park and is designated due to its complex of flooded gravel pits. The River Witham Aubourn to Beckingham Local Wildlife Site is also

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			situated within the boundary of the Solar and Energy Storage Park. Both therefore could have potential to contain populations of aquatic invertebrates. In the absence of evidence of agreement with consultation bodies, and as aquatic invertebrate surveys have not yet been completed to inform the baseline, the Inspectorate considers that this matter cannot be scoped out of the assessment at this stage.
3.2.3	Paragraph 9.7.2	Bird displacement and collision with solar panels - operation	The Scoping Report states that the Proposed Development is not situated on a migratory flyway or flightpath used by congregations of birds and there is no evidence in the UK that solar panels increase the risk of mortality or displacement of bird populations. Risk of collision with solar panels is therefore proposed to be scoped out of the assessment. In the absence of evidence of agreement with consultation bodies and as bird surveys are yet to be completed, the Inspectorate considers that displacement and collision effects on birds cannot be scoped out of the assessment at this stage.

ID	Ref	Description	Inspectorate's comments
3.2.4	Paragraph 3.2.30	Disturbance - operation	The Scoping Report Description of the Proposed Development indicates that some elements of the Proposed Development will have operational lighting from dusk, including the primary substation. The ES should therefore consider the potential for effects from light disturbance on sensitive ecological receptors during operation.
3.2.5	Paragraph 9.4.6	Priority Habitats – construction and operation	The Inspectorate notes the presence of Stocking Wood, which appears to directly adjoin Tunman Wood Local Wildlife Site and is within the boundary of the Proposed Development. The ES should

ID	Ref	Description	Inspectorate's comments
			consider this site within the baseline and assess the potential for significant effects on this site.
3.2.6	Paragraph 9.5.3	Species displacement and collision with overhead lines - operation	The ES should consider the potential for bat and bird collision and displacement effects with the proposed new overhead lines during operation, where this option remains under consideration within the ES.
3.2.7	Paragraph 9.5.3	Fragmentation of populations and habitats - operation	The ES should also consider the potential for the proposed overhead lines to create a barrier to the movement of mobile species such as birds and bats during operation, where this option remains under consideration within the ES.
3.2.8	Paragraph 9.5.7	Veteran and ancient trees	The Scoping Report notes that the design would avoid impacts on veteran / ancient trees. The ES should therefore be supported by appropriate baseline data, including field survey, to identify the presence and condition of existing veteran and ancient trees, including hedgerow trees. Effects on ancient and veteran trees should be addressed in the ES, where significant effects are likely to occur.

3.3 Water Environment

(Scoping Report Chapter 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.3.2	Paragraph 10.2.1	Study Area	The ES should provide justification for the 1km study area for the water environment assessment and describe any waterbodies located outside of the established 1km study area that have also been included in the assessment, such as those downstream. This should be supported by appropriate figures in the ES.
3.3.3	Paragraphs 10.3.9 and 10.4.2	Flood Risk Guidance	The assessment of flood risk should consider the North Kesteven Strategic Flood Risk Assessment, (2009).
3.3.4	Paragraph 10.3.10	Mitigation Measures	The Inspectorate notes the proposed use of mitigation measures, namely Sustainable Drainage Systems (SuDs). The design of such mitigation measures should be informed by relevant and up to date climate change allowances for the lifetime of the Proposed Development.
3.3.5	Paragraph 10.4.33	Water Quality – construction and operation	The ES should include a description of any measures proposed to reduce pollutant runoff into nearby watercourses, for example, design measures or best practice measures to be secured via the Construction Environmental Management Plan (CEMP) or within the drainage strategy.

ID	Ref	Description	Inspectorate's comments
3.3.6	Paragraph 10.5.3 Table 15-1	Pollution effects – construction	The Scoping Report identifies potential for pollution of surface or groundwater to occur from soil, sediments, oils, fuels and other chemicals from construction activities. The Inspectorate notes that in the absence of a separate chapter for the assessment of major accidents or disasters, that consideration for spillages from hazardous roads as a result of traffic accidents will be considered within existing technical assessments. The water environment assessment should therefore include an assessment of these potential risks, where there is potential for significant effects to occur.
3.3.7	Paragraph 10.5.3	Horizontal Directional Drilling – construction	The Inspectorate notes that there is potential for Horizontal Directional Drilling (HDD) to be used as a non-intrusive method of cable laying. Where HDD is proposed for watercourse crossings, the ES should include an assessment of the potential effects from release of drilling fluids during crossings and also consider potential effects on existing flood defences from noise and vibration. This assessment should therefore make appropriate cross reference to the ground conditions and noise and vibration aspect assessments.
3.3.8	Paragraph 10.8.3	Flood risk receptors	The Scoping Report identifies infrastructure assets, buildings and property as flood risk receptors. In areas of increased flood risk, the ES should also consider the risk to people and employees.
3.3.9	-	Flood Zone 3	The ES should differentiate between Flood Zones 3a and 3b in order to determine which parts of the site are located in areas considered as 'high probability of flooding' and 'functional floodplain'. Where development is to be located within Flood Zone 3, then an assessment of the floodplain loss should be made and floodplain compensation provided. This should include consideration of the cumulative losses from solar panel mountings. Essential infrastructure located within Flood Zone 3a should be designed and constructed to

ID	Ref	Description	Inspectorate's comments
			remain operational and safe in times of flood and throughout the lifetime of the Proposed Development, taking account of climate change.
3.3.10	-	Construction compounds	The ES should include an assessment of the potential impacts from construction compounds on water environment receptors. The ES should also explain how flood risk and the location of existing flood defences have been taken into account in the location of construction compounds and the access to them.
3.3.11	-	Flood risk – decommissioning	The ES should consider flood risk impacts of decommissioning and how the floodplain may return to its natural state thereafter. The flood risk effects from decommissioning should therefore be discussed with the relevant consultation bodies prior to the production of any outline decommissioning environmental management plan.
3.3.12	-	Landscaping and flood flows	The ES should consider the potential effect that landscaping schemes could have on flood flow routes, including appropriate cross reference to the landscape and visual aspect assessment.

3.4 Landscape and Visual Amenity

(Scoping Report Chapter 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.4.2	-	Visual effects on transient receptors – construction and operation	The ES should consider the potential for visual effects by transient receptors such as recreational users of Public Rights of Way (PRoW) footpaths and bridleways, and people travelling by car, bus or cycles. Considering the proximity of the site to navigable rivers (such as the River Witham), receptors navigating along rivers should also be considered where there is potential for significant effects to occur.
3.4.3	Paragraph 11.4.41	Viewpoints	The Scoping Report states that the extent of the Landscape and Visual Impact Assessment (LVIA) study area and suitable viewpoints for the assessment will be developed in consultation with the Local Planning Authorities. The reasons for the selection of viewpoints should be explained in the ES. Consideration should also be given in the ES to the potential for wider views from the Lincolnshire Escarpment and Cliff villages to the Proposed Development, including the potential for reflection and glint and glare from solar panels.
3.4.4	Paragraph 11.8.5	Long Term maintenance/management.	The ES should cover the establishment period of any landscaping scheme and any long-term management needs. Any assumptions made with regards to the height that proposed mitigation planting would have reached by the assessment years should be clearly presented and justified.

ID	Ref	Description	Inspectorate's comments
3.4.5	-	Policy Guidance	The Inspectorate considers that the ES should have regard to the following documents that have been identified in scoping consultation responses: • 2007 North Kesteven District Council Landscape Character Assessment; • Policy S62: 'Area of Outstanding Natural Beauty and Areas of Great Landscape Value' of the Central Lincolnshire Local Plan (2023); and • The 2019 Greater Lincolnshire Nature Partnership baseline Green Infrastructure Map for Central Lincolnshire.

3.5 Noise and Vibration

(Scoping Report Chapter 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Table 12.6	Traffic vibration - operation	The Scoping Report refers to DMRB LA 111, which states that operational vibration should be scoped out of the assessment methodology as a maintained road surface will be free of irregularities as part of project design and under general maintenance. The Scoping Report concludes that operational vibration will not have the potential to lead to significant adverse effects. Additionally, it explains that the condition of road surfaces on the highway network falls outside the scope of the Proposed Development. Based on the nature and characteristics of the Proposed Development the Inspectorate agrees that construction road traffic vibration can be scoped out of the assessment.
3.5.2	Paragraph 12.5.6 Table 12.6	Ground vibration - operation	The Scoping Report states that the Proposed Development would not use any plant capable of generating perceptible levels of vibration, and that as such there will be no associated operational vibration effects. Considering the characteristics of the Proposed Development, the Inspectorate is content that this matter can be scoped out. The ES should demonstrate that operational plant and equipment is of a type and to be used in locations unlikely to result in significant vibration impacts on sensitive receptors.
3.5.3	-	Noise effects from cable route corridor – operation	The Scoping Report considers that the cable corridor is unlikely to generate any operational noise emissions. The Inspectorate considers that given the stage of design of the Proposed Development and as the preferred option for the Grid Connection Corridor has yet to be

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			determined, that operational noise cannot be scoped out of the assessment at this stage. The ES project description should contain information on potential sources of operational noise and their location in order to inform the assessment of potential significant effects on sensitive receptors.
3.5.4	Table 12.6	Noise - decommissioning	The noise assessment presented for the construction phase is considered to be representative (or an overestimate) of the decommissioning stage. The Scoping Report considers a separate assessment to be unnecessary. Limited information is provided regarding the activities proposed for the decommissioning phase, and there is little evidence to support the claim that the decommissioning phase impacts would be less significant than during construction. On the basis of the information provided, the Inspectorate does not agree to scope this matter out at this stage.

ID	Ref	Description	Inspectorate's comments
3.5.5	Paragraph 12.2.2	Assessments within other Chapters	The Scoping Report refers to assessments of noise and vibration on ecological and cultural heritage receptors. The Inspectorate considers that noise and vibration may also have the potential to lead to adverse effects on landscape and visual receptors (for example in terms of tranquillity), and as such the effects of noise and vibration on these receptors should also be assessed.
3.5.6	Paragraph 12.2.2	Study Area	The Scoping Report states that a 500m study area will be used to assess operational noise from the Solar and Energy Storage Park. The study area has been determined based on previous experience of solar farm projects.

ID	Ref	Description	Inspectorate's comments
			The ES should explain how the study area and sensitive receptors were selected, including provision of appropriate figures. Effort should be made to agree the study area with relevant consultation bodies. As flexibility is sought to accommodate future developments in technology, the ES should identify the extent of likely operational noise levels and be able to demonstrate that effects have been determined on a worst-case basis.

3.6 Socio-Economics and Land Use

(Scoping Report Chapter 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Paragraph 13.7.1	Mineral Safeguarding Areas	The Scoping Report proposes to scope out effects on Mineral Safeguarding Areas as none are identified within the site boundary. Two safeguarded areas are however noted to be in proximity to the site boundary: MS04-LT: Swinderby Airfield, Witham St Hughs and MS05-LT: Norton Bottoms Quarry, Stapleford. The proposed development is also noted to be partially located within a Mineral Safeguarding Area for sand and gravel and limestone. The Inspectorate does not therefore consider that there is sufficient evidence for effects on mineral safeguarding areas to be scoped out of the assessment at this stage. The ES should include a figure to identify the location of these safeguarded areas and the study area that has been used for the assessment of effects on minerals resources. This should also cross refer to the assessment of ground conditions. The ES should demonstrate that the Minerals Planning Authority has been consulted in respect of all of the proposals and that the Proposed Development does not impact on future ambitions for minerals extraction within the region.

ID	Ref	Description	Inspectorate's comments
3.6.2	Section 13.2	Study area	The Scoping Report does not provide details of the study area that would be used to consider the extent of potential socio-economic, recreation and land use effects. This should be set out in the ES, supported by an appropriate explanation of how the study area has

ID	Ref	Description	Inspectorate's comments
			been defined, with appropriate figures provided. Effort should be made to agree the study areas with relevant consultation bodies.
3.6.3	Paragraph 13.5.1	Effects on soils - construction	The ES should include an assessment of the effects on soil resources and soil structure, due to the potential for soil stripping during construction, compaction from construction activity and to identify potential measures for appropriate soil handling and storage. The ES should therefore include an outline soil management plan as part of any CEMP.
3.6.4	Section 13.6	Recreation baseline	The Scoping Report does not describe how the baseline will be established for recreational and community facilities and open space. The ES should provide details of all desk and field-based sources of information used to support the baseline and assessment of effects from changes in land use.
3.6.5	Section 13.6	Agriculture and land use baseline and assessment	The Inspectorate considers that given the location for the Proposed Development is currently predominantly in agricultural land use, that the approach to the assessment of effects on agricultural land should be clearly and separately defined within any socio-economic assessment in the ES. Effort should be made to agree the methodology, study area and approach to the baseline Agricultural Land Classification surveys with relevant consultation bodies. Effects and surveys should be considered for the grid connection corridor as well as the Solar and Energy Storage Park, where there is potential for significant effects to occur.
3.6.6	Paragraph 13.6.2	Soil survey methodology	The Scoping Report notes that a soil survey will be undertaken. This should also consider Natural England guidance (Agricultural Land Classification; Protecting the best and most versatile agricultural land (TIN049), 2012) and agreement sought on the locations and numbers of soil samples to be taken with relevant consultation bodies. This

ID	Ref	Description	Inspectorate's comments
			should be used to support the assessment of effects on best and most versatile agricultural land from the Proposed Development.
3.6.7	Paragraph 13.6.4	Assessment of effects – construction and operation	The ES should consider potential for effects at all stages of the Proposed Development. The following effects should therefore also be considered, where there is potential for significant effects to occur: • effects of the temporary influx of construction workers on local businesses and employment (construction); • changes to the nature of local employment within the farming industry; • effects on public access, greenspaces and their amenity value during construction and operation; and • assessment of the temporary and permanent loss of Best and Most Versatile agricultural land. Effects should be considered both from the Proposed Development, and cumulatively with other developments.
3.6.8	Paragraph 13.6.13	Effects on farm businesses – construction and operation	The ES should identify the agricultural land uses that will be displaced by the Proposed Development. Potential effects on farm businesses, loss of agricultural production and implications for food security from both the Solar and Energy Storage Park and Grid Connection Corridor should be considered where there is potential for significant effects to occur. This should consider both effects alone and cumulatively with other projects. Effects such as severance to farm access or changes to the scale and long-term viability of farm holdings affected by the Proposed Development should also be considered.
3.6.9	-	Productive use of agricultural land	The ES should demonstrate how any retained agricultural land will be available for future productive use and consider the potential

ID	Ref	Description	Inspectorate's comments
			economic effects of any changes in land use patterns as a result of the Proposed Development.
3.6.10	-	Effects on local recreational facilities and access	The ES should consider the potential effects of the Proposed Development on local recreational facilities, including the Witham Valley Country Park, local circular walking routes within the area of the park and public rights of way. Effects should be assessed for both construction / decommissioning and operational phases of the Proposed Development, where significant effects are likely to occur.

3.7 Traffic and Transport

(Scoping Report Chapter 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Section 14.6 Paragraph 14.6.1	Hazardous and dangerous loads	The Scoping Report considers that there are not expected to be any hazardous and dangerous loads associated with the Proposed Development. Measures within an outline Construction Traffic Management Plan are proposed to ensure the safe vehicular transport of components to and from the Solar and Energy Storage Park. Given that no information has been provided regarding vehicle movements and to the type and nature of hazardous and dangerous loads, the Inspectorate does not agree to scope this matter out. The ES should provide the number and composition of any hazardous loads and describe any safety measures. Scoping Report Table 15-1 indicates that risks from spillages of hazardous loads due to accidents will be considered within the assessment of water environment effects. The ES should therefore ensure that clarification and cross-referencing is present in the assessment of any potential risks within the traffic and transport chapter.
3.7.2	Section 14.6 Paragraph 14.6.2	Operational Traffic	The Scoping Report advises that the operation of the Proposed Development is likely to generate a low level of trips along the local network within network peak hours. The Inspectorate agrees to scope this matter out subject to the provision of information regarding the type of maintenance visits and vehicles required, and confirmation that these would not exceed relevant thresholds of effect (e.g. as set out in IEMA Guidelines:

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			Environmental Assessment of Traffic and Movement 2023). This should also take into account any cumulative traffic effects.
3.7.3	Section 14.6 Paragraph 14.6.3	Standalone Travel Plan	The Scoping Report states that a stand-alone travel plan is not proposed to be produced as part of the DCO and that therefore it has been scoped out. Instead, certain aspects of a travel plan, such as the mitigation and management of construction staff, are to be included as part of an Outline Construction Travel Management Plan. This is to be discussed and agreed with the Local Highway Authority. The Inspectorate has considered the nature and characteristics of the Proposed Development and is content with this approach. The ES should include a description of any necessary mitigation measures relevant to impacts from Traffic and Transport and explain how such measures would be secured through the DCO or other legal mechanism.
3.7.4	Section 14.6 Paragraph 14.6.4	Decommissioning traffic	The Scoping Report states the assessment of the decommissioning phase will be assumed to be the same as the anticipated impact during the construction stage. Traffic effects from decommissioning are proposed to be scoped out due to the uncertainties with likely future traffic flows. The Inspectorate notes that it is difficult to predict traffic data for the future decommissioning phase but considers that given traffic flows during decommissioning could be similar to that of construction, that this matter cannot be scoped out of the assessment at this stage. An outline decommissioning travel plan should also be included within the ES.

ID	Ref	Description	Inspectorate's comments
3.7.5	Paragraph 14.2.19	Assessment Guidelines	The Scoping Report indicates that the impact assessment is based on Guidelines for the Environmental Management of Road Traffic (1993). The ES should take into account that the Guidelines for the Environmental Management of Road Traffic (1993) have been replaced by new guidance from the Institute of Environmental Management and Assessment: Environmental Assessment of Traffic and Movement, July 2023.

3.8 Other Environmental Topics

(Scoping Report Chapter 15)

ID	Ref	Applicant's proposed aspects / matters to scope out	Inspectorate's comments
3.8.1	Paragraph 15.2.11	Air quality - construction	The Scoping Report proposes to scope out construction air quality effects from traffic on the basis that HGV numbers are likely to be below the criteria for large construction sites in published guidance for significant effects (Environmental Protection UK, Institute of Air Quality Management). No details of the likely levels of construction traffic are provided in the Scoping report and details are not yet available on the location of all construction access points, construction compounds, or the likely method for exporting electricity to the transmission network from the Proposed Development (overhead or underground). On this basis, the Inspectorate does not agree that air quality effects from construction activities can be scoped out of the assessment at this stage.
3.8.2	Paragraph 15.2.12 and 15.2.13	Air quality - operation	The Scoping Report proposes to scope out operational air quality given that there will no emissions from on-site infrastructure and movement of vehicles during operation are expected to be minimal. The Inspectorate agrees that it is unlikely that the operation of the Proposed Development would generate significant emissions to air or significant operational traffic and that these matters can therefore be scoped out of the assessment. The ES must however provide information on the nature of vehicle movements during the operational phases (alone and cumulatively) and confirm these projections fall below the relevant thresholds set out in guidance. The ES project description should also confirm that there are no emissions from operational plant that require further assessment.

ID	Ref	Applicant's proposed aspects / matters to scope out	Inspectorate's comments
3.8.3	Paragraph 15.3.5	Glint and glare – construction	The Scoping Report proposes that as glint and glare effects will be less during construction and as measures within a Construction Environmental Management Plan will be used to avoid possible glint and glare effects during construction, that this matter can be scoped out of the assessment. The Inspectorate agrees that glint and glare during construction is likely to be temporary and localised, and on the basis of specific measures to control effects within a CEMP, that this matter can therefore be scoped out of the assessment.
3.8.4	Paragraph 15.4.7	Pollution - operation	The Scoping report proposes to scope out effects from accidental spillages from maintenance activities during operation, on the basis of preparing an Operational Environmental Management Plan (OEMP) following grant of any Development Consent Order. The Inspectorate agrees that it is unlikely that the operation of the Proposed Development would generate significant pollutants and that these matters can therefore be scoped out of the assessment. The ES must however provide information on the nature and quantities of the likely chemicals used during maintenance activities and provide an outline of the OEMP. The OEMP should contain information on how adverse effects will be avoided or mitigated.
3.8.5	Table 17-1	Human health	The Inspectorate notes that a standalone human health assessment is proposed to be scoped out of the assessment, noting that matters relating to human health would be covered within the landscape and visual, noise and vibration, traffic and transport and air quality assessments in the ES. The Inspectorate notes the potential for a 400 kV overhead line being proposed as part of the Proposed Development. Where this option is progressed within the ES, it should demonstrate the potential for significant effects on human health during operation, construction and decommissioning. Providing such a justification is present, the

ID	Ref	Applicant's proposed aspects / matters to scope out	Inspectorate's comments
			Inspectorate is content that a standalone ES chapter for Human Health is not required and agrees that this aspect can be scoped out. The ES should ensure sufficient clarification and cross referencing is present. Consideration should be given to direct and indirect impacts on human health receptors. The assessment should be informed by relevant guidance such as the Institute of Environmental Management and Assessment (IEMA) 2022 guidance 'Determining Significance for Human Health in Environmental Impact Assessment'.
3.8.6	Table 17-1	Telecommunications, television reception and utilities	The Scoping Report proposes to scope out these matters on the basis that a standalone desk-based assessment will be carried out. The Inspectorate considers that insufficient evidence has been supplied to confirm the potential effects of the Proposed Development on telecommunications, utilities and television reception, particularly given the stage of the design for the Proposed Development. The Inspectorate does not therefore agree that these matters can be scoped out of the assessment at this stage.
3.8.7	Appendix B	Long list of major accidents or disasters	Based on the information provided within the Scoping Report, the Inspectorate is in agreement that an assessment of the following major accidents or disasters, in relation to both the risk of the Proposed Development causing, and the Proposed Development's vulnerability to, can be scoped out: • geological disasters – landslides, earthquakes, sinkholes; • hydrological disasters – limnic eruptions, tsunamis / storm surge • meteorological disasters – blizzards, cyclonic storms, droughts, • thunderstorms, hailstorms, heat waves, tornadoes, air quality

ID	Ref	Applicant's proposed aspects / matters to scope out	Inspectorate's comments
			• events (emissions); • transport – rail accidents; • engineering accidents – bridge failure, tunnel failure or fire, • tunnel failure, dam failure, mast and tower collapse, building failure or fire; • industrial accidents – defence industry, energy industry (fossil fuel), nuclear power, oil and gas refinery / storage, food industry, chemical industry, manufacturing industry, mining/extractive industry; • terrorism / civil unrest; • war; and • disease – human disease, animal disease

ID	Ref	Description	Inspectorate's comments
3.8.8	-	Approach to other environmental topics	The Inspectorate notes the approach within the ES to provide a single chapter supported by technical notes to address Air Quality (dust and vehicle and plant emissions), Glint and Glare, Contaminated Land, Major Accidents and Disasters and Waste effects. The Inspectorate considers that there is insufficient evidence yet available to conclude that these aspects will not give rise to significant effects. Each aspect assessment should nevertheless be supported by proportionate information. Each section should provide a baseline, appropriate figures to allow identification of sensitive receptors and study areas and evidence to support any conclusions with reference to appropriate published aspect – specific guidance where relevant. Where significant effects are likely to occur, an appropriate

ID	Ref	Description	Inspectorate's comments
			methodology for the assessments, that refers to the overarching EIA methodology in the ES, should also be provided. This information should all be easy to locate within the ES.
3.8.9	-	Glint and glare – tracking versus fixed solar panels	The ES should include a full comparison of impacts of the two potential options considered in the Scoping Report for the deployment of either tracking or fixed solar panels, unless the detailed design has reached a point where the proposed panel type is confirmed. Should tracking solar panels be selected, glint and glare potential in relation to the degree/orientation and any pivot of the panel should also be considered within the ES.
3.8.10	-	Ground conditions	The scope of the assessment provided in the Scoping Report indicates several pathways to significant effects from contaminants (such as release of drilling fluids from Horizontal Directional Drilling and potential for spillages from hazardous loads) and identifies potential for ground instability from previous quarrying activities. As baseline data have not yet been gathered and no details are available of the nature of the potential contamination sources within the site boundary, ground stability or the Proposed Development, the Inspectorate considers that significant effects on ground conditions cannot be excluded at this stage. The ES should therefore contain an assessment of potential effects on ground conditions, where significant effects are likely to occur.
3.8.11	Section 15.5	Major accidents or disasters	The Inspectorate notes the approach to considering the identified short list of major accidents or disaster risks in existing technical assessments rather than as a specific aspect chapter. Not all shortlisted effects in Table 15-1, however, appear as part of the scope of the assessment presented in the stated technical chapters of the Scoping Report. The ES should contain appropriate signposting so that it is possible to locate these assessments and to ensure that all

ID	Ref	Description	Inspectorate's comments
			identified effects are appropriately considered in the relevant aspect chapters.
3.8.12	Section 15.5	Major accidents or disasters - battery energy storage	The ES should also consider the effects from failure of the proposed battery storage systems. This should include consideration of the risks from overheating, or explosion. Mitigation measures to control or eliminate potential adverse effects should also be described.
3.8.13	Paragraph 3.2.54 Table 17-2	Disposal of redundant infrastructure	A description of the potential streams and volumes of construction and operational waste disposal are proposed to be covered within the ES description of development chapter. Impacts are proposed to be addressed through an outline Decommissioning Environmental Management Plan, and a Site Waste Management Plan within a CEMP. The Scoping Report states that solar panels would be disposed of or recycled in the decommissioning phase and that operational waste will be negligible. The ES should include an assessment of waste impacts for the decommissioning phase. This should outline what measures, if any, are in place to ensure that components (e.g. from batteries and / or panels) are able to be diverted from the waste chain and disposed of safely given that some types of solar panels can contain hazardous materials. Waste should be managed in line with the waste hierarchy based on available technology at the time. The ES should also consider the requirement for cumulative impacts to be assessed at decommissioning due to a number of solar farms in the local area also likely to be decommissioning in a similar timescale.
3.8.14	3.2.25	Electric, Magnetic and Electromagnetic fields (EMF) - operation	The Scoping Report indicates that the electricity to be generated by the Proposed Development is expected to be exported via a 400kV connection either underground or overhead to a new National Grid substation. Where a 400kV overhead line option is progressed, the ES should consider the potential for effects on human health from

ID	Ref	Description	Inspectorate's comments
			possible EMF, taking into account relevant guidance, where significant effects are likely to occur.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES[1]

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	The Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Integrated Care Board	NHS Lincolnshire Integrated Care Board
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Lincolnshire Fire and Rescue services
The relevant police and crime commissioner	Lincolnshire Police and Crime Commissioner
The relevant parish council (s)	Blankney Parish Council
	Metheringham Parish Council
	Dunston Parish Council
	Navenby with Skinnand Parish Council
	Wellingore Parish Council
	The Ashby de la Laude and Bloxholm with Temple Bruer and Temple High Grange Parish Council
	Norton Disney Parish Council
	Bassingham Parish Council
	Boothby Graffoe Parish Council
	Aubourn with Haddington Parish Council

[1] Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Swinderby Parish Council
	Witham St Hughs Parish Council
	Eagle and Swinethorpe Parish Council
	Thorpe on the Hill Parish Council
	Harmston Parish Council
The Environment Agency	The Environment Agency
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Lincolnshire County Council
The relevant strategic highways company	National Highways
The relevant internal drainage board	Trent Valley Internal Drainage Board
	Upper Witham Internal Drainage Board
	Witham First Internal Drainage Board
The Canal and River Trust	The Canal and River Trust

TABLE A2: RELEVANT STATUTORY UNDERTAKERS[2]

STATUTORY UNDERTAKER	ORGANISATION
The Forestry Commission	East and East Midlands Forestry Commission
Ministry of Defence	The Secretary of State for Defence
The relevant Integrated Care Board	NHS Lincolnshire Integrated Care Board
The National Health Service Commissioning Board	NHS England
The relevant NHS Trust	East Midlands Ambulance Service NHS Trust

[2] 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
Canal Or Inland Navigation Authorities	The Canal and River Trust
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	Lincolnshire and Northamptonshire
The relevant water and sewage undertaker	Anglian Water
	Severn Trent Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Energy Assets Pipelines Limited
	ESP Connections Ltd
	ESP Networks Ltd
	ES Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Quadrant Pipelines Limited
	Squire Energy Limited

STATUTORY UNDERTAKER	ORGANISATION
	National Gas Transmission plc
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	Utility Assets Limited
	National Grid Electricity Distribution (East Midlands) Limited
	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))[3]

LOCAL AUTHORITY[4]
City of Lincoln Council
Newark and Sherwood District Council
West Lindsey District Council
South Holland District Council
Boston Borough Council
East Lindsey District Council
South Kesteven District Council
North Kesteven District Council
Lincolnshire County Council
North Northamptonshire Council
Peterborough City Council
North East Lincolnshire Council
North Lincolnshire Council
Rutland County Council
Cambridgeshire County Council
Norfolk County Council
Nottinghamshire County Council
Leicestershire County Council

[3] Sections 43 and 42(B) of the PA2008

[4] As defined in Section 43(3) of the PA2008

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Aubourn with Haddington Parish Councll
Cadent Gas
Canal and River Trust
Coleby Parish Council
Environment Agency
Forestry Commission
Historic England
Historical Railways Estate
Lincolnshire County Council
National Gas Transmission
National Grid
NATS Safeguarding
Natural England
Navenby Parish Council
Newark and Sherwood District Council
North Kesteven District Council
North Northamptonshire Council
Norton Disney Parish Council
Nottinghamshire County Council
Peterborough City Council
Severn Trent Water
South Holland District Council

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Thorpe on the Hill Parish Council
Wellingore Parish Council
West Lindsey District Council
Witham and Humber Drainage Boards (Upper Witham Drainage Board and Witham First Internal Drainage Board)

Aubourn with Haddington Parish Council Lincolnshire

FOSSE GREEN ENERGY – PROPOSED SOLAR & ENERGY STORAGE PARK

This paper sets out what Aubourn with Haddington Parish Council and it`s parishioners would like to see in the Environmental Statement and Scoping Document prior to submission to the Secretary of State.

We believe that the following issues are not clearly stated within the document or do not appear within.

1. **Witham Valley Countryside Park**

There is no mention of the Witham Valley Countryside Park. The park area contains Sites of Special Scientific Interest, Nature Reserves and Local Wildlife Sites, which contain species of flora and fauna that are rare to Lincolnshire. The area is rich in biodiversity and provides habitats that support a diverse plant, bird and insect population, perfect for birdwatching activities.

Aubourn with Haddington Parish Council Lincolnshire would like to see a full assessment of bird population, types, migratory routes and habitats for the Whisby nature reserve and the Witham Valley Country Park as a whole. This statement is made as the proposed Solar Farm sits right in the middle of the Witham Valley Country Park.

2. **Public rights of way.**

Within the proposed area of the Solar Farm are various Public Footpaths, Public Bridleways, Restricted Byways and Byway open to all traffic (BOAT).

Aubourn with Haddington Parish Council Lincolnshire would like to see a full List, Type and Location Plan of all the Public rights of way as discussed above and what mitigation will be provide to retain access to these routes.

3. **School Proximity to Inverters and Battery Storage**

Within the proposed area of the Solar Farm are various Schools that may be in close proximity to the solar farm. The inverters and battery storage are likely to emit high frequency noise, within Human hearing range, where young children will be mostly affected.

Aubourn with Haddington Parish Council Lincolnshire would like to see mitigation statements of how these high frequency sounds will be measured and reduced around the solar farm.

4. **TV Signal interference**

As the site is approx. 7.42 km (4.61 mi) wide (East to West) and 6.22 km (3.87 mi) long (North to South) there is a likelihood of interference with Terrestrial TV services due to the large footprint of the site. TV reception from the North is via the Belmont transmitter located at grid ref: 53.33573290463092, -0.17174527912535179 which is

36.38 km (22.61 mi) from the centre of the solar farm. To the south the transmitting station is at Waltham in Leicestershire, at grid ref: 52.80137303388154, -0.8008068956311353, is 39.52 km (24.56 mi) from the centre of the solar farm.

Aubourn with Haddington Parish Council Lincolnshire would like to see mitigation statements of how these high frequency TV signals will be measured in the surrounding villages and the City of Lincoln and what effect they will have due to the large footprint of the solar farm.

5. **Mobile communications interference.**

Mobile communications around the proposed solar farm are in places very weak due to the topology of the area. There is a Mobile Cellular radio Telecommunications tower located on the A46, grid ref: 53.16189955172792, -0.6591644912399385, providing services around the area of the proposed solar farm. Due the earthing of the solar panel support frames there is a likelihood of interference with the line of sight communications to the east of the solar farm due to the large footprint of the solar farm.

Aubourn with Haddington Parish Council Lincolnshire would like to see mitigation statements of how Mobile Cellular radio Telecommunications signals will be measured in the surrounding villages and what effect they will have due to the large footprint of the solar farm.

6. **Neighbourhood Plans of the affected villages.**

The local Neighbourhood plans for the affected villages surrounding the solar farm are not given a high priority and not well documented within the Fosse Green document. It does not mention the Localism Act 2011 that introduced statutory Neighbourhood Planning in England. It enables communities to draw up a Neighbourhood Development Plan for their area and is intended to give communities more of a say on the development of their local area (within certain limits and parameters).

Aubourn with Haddington Parish Council Lincolnshire would like to see greater detail of how Fosse Green propose to observe the Central Lincolnshire Local Plan Adopted 2023

7. **Visual Impact**

The document refers to the visual impact of the solar farm to a distance of 1km around its perimeter. The A46 is the Southern Gateway to City of Lincoln and will be flanked by an industrial solar park. Also very little visual impact has been documented about the visual impact at a greater distance. The Cliff villages comprising Coleby, Boothby Graffoe, Navenby, Harmston, Wellingore and Waddington all look down over the solar farm and into the distance of 23.68 km (14.71 mi). Thurlby village will be "imprisoned" within the solar farm and the villages of Aubourn, Haddington, Bassingham, Carlton Le Moorland, Swinderby, Thorpe on the Hill, and Witham St Hughs will be bordered by the solar farm and visible wherever one looks. The impact of overhead power lines

paralleling the existing lines from West Burton to Sutton Bridge intercepted by a substation at Navenby will have a profound visual impact on the outlying area.

Aubourn with Haddington Parish Council Lincolnshire would like to see greater detail of how Fosse Green proposes to mitigate the obtrusively visible footprint of the solar farm. How are they going to mitigate the fact that a peaceful rural farming community and area is going to be turned into an industrial landscape.

8. **Battery Safety**

Battery safety is one element of this project that has the ability to cause severe fire and pollution should an incident of sustained overheating occur. The document indicates that the battery and inverters will be placed away from populated areas but does not go into detail on how fires will be controlled and who will be fighting to extinguish them.

Aubourn with Haddington Parish Council Lincolnshire would like to see greater detail of how Fosse Green proposes to deal with any incident that causes fire and how they will mitigate this.

9. **Use of BMV Land**

The document discusses that 2,500 acres of BMV land at Grade 3 will be used for the solar farm therefore removing agricultural growing capacity and National Food security.

Aubourn with Haddington Parish Council Lincolnshire would like to see how Fosse Green can justify the use of Grade 3 agricultural land for an Industrial solar farm as opposed to providing food for the country.

10. **MOD RAF Waddington**

There is no mention of RAF Waddington or consultation with the Ministry of Defence within the document on the proposed Fosse Green Solar farm.

Aubourn with Haddington Parish Council Lincolnshire would like to see a section on consultation with the Ministry of Defence and whether this project is likely to interfere with flight operations of RAF Waddington.

This document has been produced with the input of Aubourn with Haddington Parish Council comprising:

Councillor Jason Snape (Chairman)
Councillor John Mosedale (Vice Chairman) Author
Councillor Julie Placket Smith
Councillor Carrie Page

REF:

Date; 18.07.2023

Submitted via email to: fossegreenenergy@planninginspectorate.gov.uk

Cadent Gas Limited
Cadent
Pilot Way
Ansty
Coventry
CV7 9JU
Cadentgas.com

Cadent
Your Gas Network

I refer to your email dated 20th June 2023 regarding the above proposed DCO and your current consultation.

In respect of existing Cadent infrastructure, Cadent will require appropriate protection, assurance or relocation of retained apparatus including compliance with relevant standards for works which may be proposed within close proximity of its apparatus.

Cadent has identified the following apparatus within the vicinity of the proposed works:

- Medium pressure (below 2 bar) gas pipelines and associated above and below ground equipment (as a result it is highly likely that there are also gas services and associated apparatus in the vicinity, these are not shown on plans but their presence should be anticipated and investigated further)

- Above Ground Installations

Note: No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission.

Diversions and Protection of Apparatus:

In order to assess the impact to Cadent's appraataus and network, as a minimum we need to conduct a high level impact assessment and feasilbity study of our below 7 bar and above 7 bar network associated with the Fosse Green Energy Scheme. This work can take upwards of 12 months to undertake depending on the complexity of the scheme and therefore a meeting with the Promoter to discuss the scope and requirements is recommended at the earliest opportunity.

Cadent will provide (not limited to):

- Drawings showing asset locations and an high level view whether the asset would be a 'Divert, Protect or Abandon'

- An impact assessment based on information provided by the Promoter (including Shapefiles and Design information as requested/agreed)

- Asset information of impacted assets, including size, material and any high level outage windows

- An indication of the cost of the project (desktop exercise only) and where applicable any major foreseen difficulties

Land & Consents Requirements

Where diversions of apparatus are required to facilitate the scheme, Cadent will require the Promoter to obtain all necessary land, planning permissions and other consents to enable the diversion works to be carried out. Details of these consents should be agreed in writing with Cadent before any applications are made to ensure that they are sufficient to deliver works within the proposed timescales. Cadent would ordinarily require a minimum of Conceptual Design study to have been carried out to establish appropriate diversion routes, land and consents requirements ahead of any application being made.

The Promoter will be responsible for obtaining at their cost and granting to Cadent the necessary land rights, on Cadent's standard terms, to allow the construction, maintenance, protection and access of the diverted apparatus. As such adequate land rights must be granted to Cadent (e.g. following the exercise of compulsory powers to acquire such rights included within the DCO) to enable works to proceed, to Cadent's satisfaction. Cadent's approval to the land rights powers included in the DCO prior to submission is strongly recommended to avoid later substantive objection to the DCO. Land rights will be required to be obtained prior to construction and commissioning of any diverted apparatus, to avoid any delays to the project's timescales. A diversion agreement may be required addressing responsibility for works, timescales, expenses and indemnity.

Protection/Protective Provisions:

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of Cadent's apparatus, Cadent will require appropriate protection for retained apparatus and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. Operations within Cadent's existing easement strips are not permitted without approval and any proposals for work in the vicinity for Cadent's existing apparatus will require approval by Plant Protection under the Protective Provisions. Early discussions are advised.

Yours Faithfully

[redacted]

Toby Feirn

Planning and Consents Manager

Land & Property Services

[redacted]@CadentGas.com;

[redacted]

PLANT PROTECTION – KEY CONSIDERATIONS

- Any works relating to the Heathrow expansion project that may have an impact on the Cadent Gas Network MUST be submitted to the Plant Protection team at Hinckley (plantprotection@cadentgas.com). Details can be found here https://cadentgas.com/Digging-safely/Work-safely-library, offering an on-line request, or details to contact Hinckley direct by email, post or telephone. This includes all prior Ground Investigation, pre-enabling works such as Archaeological excavations, and temporary and permanent crossings of buried pipelines. The Heathrow Expansion Project should be aware that even though intrusive ground works may not impact on the Cadent Gas Network crossing of buried assets to these works may need to be assessed

- Written permission is required before any works commence within a Cadent easement strip and a Deed of Consent may be required if any apparatus needs to cross the Cadent easement strip

- The below guidance is not exhaustive and all works in the vicinity of Cadent's asset shall be subject to review and approval from Cadent's plant protection team in advance of commencement of works on site.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and Cadent's specification for Safe Working in the Vicinity of Cadent High Pressure gas pipelines and associated installations - requirements for third parties GD/SP/SSW22. Digsafe leaflet Excavating Safely - Avoiding injury when working near gas pipes. There will be additional requirements dictated by Cadent's plant protection team.

- Cadent will also need to ensure that all pipelines remain accessible throughout and after completion of the works

- The actual depth and position must be confirmed on site by trial hole investigation under the supervision of a Cadent representative. Ground cover above our pipelines should not be reduced or increased.

- If any excavations are planned within 3 metres of Cadent High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a Cadent representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

- Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with Cadent's Plant Protection team is essential:

    - Demolition
    - Blasting
    - Piling and boring
    - Deep mining
    - Surface mineral extraction
    - Landfilling
    - Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.)
    - Wind turbine installation
    - Solar farm installation
    - Tree planting schemes

Pipeline Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.

- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with Cadent prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the Cadent pipeline without the prior permission of Cadent.
- Cadent will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to Cadent.
- A Cadent representative shall monitor any works within close proximity to the pipeline.

New Service Crossing:

- New services may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.
- A new service should not be laid parallel within an easement strip
- A Cadent representative shall approve and supervise any new service crossing of a pipeline.
- An exposed pipeline should be suitable supported and removed prior to backfilling
- An exposed pipeline should be protected by matting and suitable timber cladding
- For pipe construction involving deep excavation (<1.5m) in the vicinity of grey iron mains, the model consultative procedure will apply therefore an integrity assessment must be conducted to confirm if diversion is required

Guidance

To download a copy of the HSE Guidance HS(G)47, please use the following link:

http://www.hse.gov.uk/pubns/books/hsg47.htm

Dial Before You Dig Pipelines Guidance:

https://cadentgas.com/Digging-safely/Dial-before-you-dig

Essential Guidance document:

https://cadentgas.com/getattachment/digging-safely/Promo-work-safely-library/Essential_Guidance.pdf

Excavating Safely in the vicinity of gas pipes guidance (Credit card):

https://cadentgas.com/getattachment/digging-safely/Promo-work-safely-library/Excavating_Safely_Leaflet_Gas-1.pdf

Copies of all the Guidance Documents can also be downloaded from the Cadent website:

https://cadentgas.com/Digging-safely/Work-safely-library

Canal & River Trust
Making life better by water

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your Ref EN010154

Our Ref IPP-199

Tuesday 18 July 2023

By email only:
fossegreenenergy@planninginspectorate.gov.uk

Dear Claire Deery,

Proposal: Fosse Green Energy – Reg 10 Consultation and Reg 11 Notification

Location: Bassingham, Lincolnshire

Waterway: River Trent and Fossdyke Canal

Thank you for your consultation relating to the above scheme.

The Canal & River Trust ("the Trust) is a statutory party[1] for the purposes of s.88(3) of the Planning Act 2008 and the Trust is a statutory undertaker for the purposes of s.127 of this Act. We are the charity who look after and bring to life 2000 miles of canals & rivers.

Having reviewed the location of the project and the relationship of the proposed solar farm and its associated infrastructure with our network, we do not believe that the proposals as shown would cross land owned or operated by the Trust or impact our interests. Our closest waterways are the River Trent approximately 6.5km to the west and the Fossdyke Canal approximately 8 kilometres northeast of the site boundary. Should the scheme be amended to potentially affect these waterways we would welcome further consultation on the proposals, so that we can advise about any potential impact for our interests.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Hazel Smith MRTPI
Area Planner – Midlands

[redacted]@canalrivertrust.org.uk
[redacted]
https://canalrivertrust.org.uk/specialist-teams/planning-and-design

[1] Reg 3 & Schedule 1, Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 (SI 2015/4620

From:	James Barry Earnshaw
To:	Fosse Green Energy
Subject:	Coleby Parish Council Response to Planning Inspectorate - Fosse Green Energy Proposed Solar & Energy Storage Park Development
Date:	17 July 2023 09:29:14
Attachments:	image001.jpg Coleby Parish Council Response to Planning Inspectorate - Fosse Green Energy Proposed Solar & Energy Storage Park Development.docx
Importance:	High

Coleby Parish Council

Dear Planning Inspectorate

Coleby Parish Council Response to Planning Inspectorate - Fosse Green Energy Proposed Solar & Energy Storage Park Development

Please find attached Coleby Parish Council's response in relation to the proposed development of a Solar & Energy Storage Park included in a scoping document from Fosse Green Energy. This response is complementary to similar responses from other Parish Councils in the proposed development area and who are adjacent to the solar farm project.

Further information can be provided as necessary by contacting the Chairman of the Parish Council, contact details below, who is responding on behalf of the Parish Council and Parish Clerk, Sue Makinson Sanders, who is currently away on holiday.

Yours sincerely

Barry Earnshaw
Chairman of Coleby Parish Council

Contact Details:
Email: [redacted]@zen.co.uk
Tel: [redacted]
Mob: [redacted]
Postal Address: The Arbours, 11 High Street, Coleby, Lincoln LN5 0AG

Coleby Parish Council, Lincolnshire

FOSSE GREEN ENERGY – PROPOSED SOLAR & ENERGY STORAGE PARK

Purpose

1. This paper sets out Coleby Parish Council's response to the Planning Inspectorate in respect of the proposed Solar & Energy Storage Park on land south west of Lincoln in the North Kesteven District Council area and including the 'Lincoln Cliff Landscape Character Area' and the 'Witham Country Park'.

Strategic & Tactical Considerations

2. **At National Level –** The Parish Council has been advised that there are currently 12 similar applications to this one, that are in Lincolnshire, that have been submitted to the Planning Inspectorate, and all are from overseas companies.

   This is happening because the Government has no National Strategic Energy proposals for large scale Solar and Energy Storage enterprises. This is a situation that needs urgent intervention and, by whatever appropriate means, puts a plan in place before these applications being applied for now are allowed to proceed further – a 'Pause and Plan' approach is recommended in relation to these proposed developments.

   The national plan should also include proposals in relation to wind and nuclear power, supplemented by new buildings being fitted with the most up-to-date systems for heating, lighting and insulation and existing buildings being retro-fitted with these new systems. This plan could be based on the energy needs of the country over the next 25 years with an indication of the resources and systems required to meet these needs, safety assessments of BESS, and how redundant equipment is safely disposed of.

Some of the main issues that should be addressed include:

- Avoidance of permanently taking massive areas of good/moderate (Category 3) farming land out of this country's food chain.

- The dangers of the large-scale areas of Battery Energy Storage Systems, in the event of failure (e.g. overheating, fire, explosion, release of toxic gases), and the infrastructure needed to cope with emergency situations.

- Realistic strategies and forecasts of how the large-scale solar farms will be upgraded or decommissioned in years to come, and particularly how the units and batteries will be disposed of safely – to avoid problems similar to disposal of redundant nuclear fuel. A system to ensure the companies involved in these projects pay for the decommissioning and upgrades, e.g. a Bond, or a special ongoing Tax levy.

- The avoidance of oversupply of electricity and so dumping it or selling to other countries at a reduced unit rate.

- Avoidance of situations where appropriate UK taxes cannot be charged to overseas Companies and also that any profits do not leave the UK.

3. **At Local/Tactical Level -** The Lincolnshire County Council has a Local Plan which promotes Solar energy, but the developments are of a smaller size and scale, the sites are envisaged to be where the electricity produced is used nearby, particularly commercially. These types of sites have been proven to be accepted by local communities, and do not have anywhere near the same environmental impact and do not require BESS.

4. **Overall Assessment -** The abundance of vast sites that are currently being proposed via The Planning Inspectorate, have a massive cumulative effect, as a huge swathe of land becomes industrial, rather than agricultural. It becomes a brownfield site, not the greenfield site it has been for so long. There are places for industrial type developments, and that is where large scale Solar and Energy Storage facilities should be considered, after appropriate planning and strategy, and investigations are undertakes as set out above.

   The size/scale of the proposed Fosse Green Energy development is likely to have a significant adverse impact upon the local landscape in our area. The cumulative visual effects will also be difficult to adequately mitigate without substantial loss of established open character/longer range vistas.

   The extent of solar panels, battery storage and substation infrastructure proposed in particular is expansive and potentially very intrusive within the landscape setting. Its industrialised appearance and scale will be unjustifiably detrimental to the character and appearance of the area.

   A significant acreage of productive grade 3 arable land will be lost as a result of the development. Global climate change will result in a higher rate of crop failure. Long term yields per hectare of arable land are consequently expected to fall. A larger land area will therefore be required in order to ensure UK food security. This resource should not be compromised.

5. **Information in an Environmental Statement:** this is the information that Coleby Parish Council proposes for inclusion in an Environmental Statement:

- An Agricultural Land Classification Report, as per Local Plan Policy Number 67.

- Alternative sites for this development should be considered and details given (in section 4 of the Scoping Report, the Applicant confirms that no other sites have been considered by them).

- Reports from independent and appropriate experts. This list should include RSPB, The Wildlife Trust, The Woodland Trust, Historic England Foundation, CPRE and the Ramblers Association etc.

6. **<u>Additional topics to be addressed</u> in at least one of the environmental statements includes:**

- **Landscape and Visual Impact:** the proposed site covers a very large area, part sits on a fairly flat area of land which can be clearly viewed from the other part which is the limestone ridge, and the Cliff Villages that are sat along the top of it. This is not just a small viewing platform, the ridge stretches for miles and curves round to surround it further. The area encompasses the Council's designated Lincoln Cliff Landscape Character Area and Witham Country Park. There would be an out of character view from the ridge on the proposed project, and additional electricity pylons stretching from the solar panels up the limestone ridge will be clearly in view from the surrounding lower lying areas.

  There is mention in the scoping plan of problems with glare and glinting from the solar panels – with such a large area being able to view the site from many angles, addressing this problem satisfactorily could be very difficult if not impossible.

- **Glint and Glare:** photovoltaic panel arrays have the potential to give rise to adverse impacts through reflection of sunlight towards sensitive receptors. The gently undulating local topography and the limestone escarpment could give rise to adverse effects. There is potential for the development to impact upon the operation of surrounding MoD facilities and the Defence Infrastructure Organisation should be consulted.

- **Noise and Light Pollution:** noise and light pollution will not only have a detrimental impact on fauna but also on nearby local communities and the effects of this will need evaluation and mitigation in any final project development proposals.

- **Cleaning and Maintenance Processes:** cleaning and maintenance processes will be necessary to ensure that the solar panels maintain maximum effectiveness and efficiency in producing electricity – this could either be a manual or mechanised process – if the former will provide substitute job opportunities making up for loss of employment in local agriculture.

- **Microclimate:** large scale solar farms are potentially capable of reducing localised wind velocity and radiating heat, which is in turn absorbed atmospherically. The local area has recently been subject to some of the highest temperatures ever recorded by the Met Office. The scale of the proposed development is somewhat unprecedented and concerns are thus raised over the impact of the scheme upon the microclimate, namely: the potential impact upon neighbouring occupants; and the potential impact upon adjacent habitat land and arable farming operations due to heat stress.

Free draining soils coupled with increasingly high summer temperatures and a warmer microclimate in the locality of the PV arrays is anticipated to result in difficulty in establishing screening landscaping measures due to high specimen failure rates.

- **Ecology:** the balance of biodiversity is bound to change in a manner that is likely to impact flora and fauna indigenous to the present landscape. The extent of the development and requirements for proliferate security fencing will potentially restrict/funnel the movement of larger fauna such as hares, foxes, badgers and deer. Avian species that rely on open fields are likely to suffer notable loss of habitat and foraging areas.
- **Safety:** the safety of the Battery Energy Storage Systems is of concern, especially as the Government has chosen not to include them under the auspices of COMAH. The Fordham/Allison article in June 2021 on the safety of Grid Scale Lithium reveals how dangerous the BESS can be, and the extensive facilities needed to try and control any failure.

  Safety and the specific locations of the BESS in relation to residential areas should be reported on, as well as high pressure gas lines, the fuel network for RAF Waddington, and any commercial storage areas of fuels and chemicals.

  In Appendix B of the Scoping Report Fosse Green Energy reveal their assessment of dangers, and the two below is where they mention BESS.

- They judge with no detail that weather temperatures are not expected to have any impact, and they only 'anticipate' that the cooling systems will regulate temperatures to safe conditions - Section 3.6 heat waves.

- In 3.8 under Fires, they suggest that there will be 'adequate' separation between the battery banks. Presumably as they are not under the regulation of COMAH, there is no confirmed safety distance, and in the Fordham/Allison article they suggest the danger is not just from fire, but thermal runaway, explosions, and the release of flammable gasses.

- **Food Production:** the project covers a very large area of good to moderate farming land. The Government's aim via DEFRA is to make our food production more sustainable – the most basic way to do this is by being as self-sufficient as possible with food production in our own country. Losing vital farming land does not seem a wise decision with this in mind, particularly brought home in the last year or so by the war in Ukraine and the rising cost of living.

- **Highways and Byways:** in one section of the scoping report, there is mention of the rural roads across the proposed site and the relevant cliff villages area being 'relatively quiet'. These roads are not relatively quiet, they are rural roads – a web of links between communities and farms, used by residents, farm traffic, delivery vehicles, and at times, others. When these narrow roads are closed even for short periods of time due to necessary road works, the

knock-on effect is massive in the surrounding areas, loading those roads with extra traffic. A small increase has a more profound effect on rural roads.

Also, the Scoping Report has a long list of Heritage Assets in the proposed development area, and also Public Rights of Way – but seems silent on addressing these issues.

- **Disposal, Replacement and Decommissioning:** an assessment of how this will be carried out in respect of the solar panels and the BESS during the lifetime of the site and then when redundant, and the environmental impact of this.

Conclusions

7. In conclusion this paper proposes that the Planning Inspectorate gives serious consideration to:

- The issues raised by Coleby Parish Council and other Parish Councils in the area in response to the proposed Fosse Green Energy solar farm development on agricultural land adjacent to the historic City of Lincoln, and

- Adopting a 'Pause and Plan' approach to provide opportunity for Central Government to develop a Strategic Energy Plan and Framework within which local authorities can consider the managed development of solar and wind farm development which avoids industrialisation of the local landscape and achieves an appropriate balance between fuel/energy and food supply which is consistent with current and future demand.

Authors: Councillors Earnshaw, Vivien, & Brewer on behalf of Coleby Parish Council – Draft V2: 15/07/2023

Claire Deary
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Our ref: XA/2023/100013/01-L01
Your ref: EN010154
Date: 14 July 2023

[via email: fossegreenenergy@planninginspectorate.gov.uk]

Dear Claire Deary

EIA SCOPING OPINION: APPLICATION BY FOSSE GREEN ENERGY LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR FOSSE GREEN ENERGY (THE PROPOSED DEVELOPMENT), LAND APPROXIMATELY 9KM SOUTHWEST OF LINCOLN, LINCOLNSHIRE

Thank you for consulting the Environment Agency on the Environmental Impact Assessment (EIA) Scoping Opinion for the above proposed development.

We have reviewed the Fosse Green Energy Environmental Impact Assessment Scoping Report, produced by AECOM (dated June 2023), insofar as it relates to our remit, and we broadly agree with the topics that have been scoped in and scoped out of the EIA.

We have the following comments on specific chapters of the Scoping Report and environmental topics within our remit:

FLOOD RISK

The project site boundary is located predominantly within Flood Zone 1 (low probability of flooding) with some areas of the site located in Flood Zone 2 (medium probability of flooding) and Flood Zone 3 (high probability of flooding), on the Environment Agency Flood Map for Planning (rivers and sea). Part of the site is also located within the Witham Washlands Flood Storage Area, which serves to protect Lincoln from flooding. There are also several statutory main rivers and ordinary watercourses located adjacent to and/or within the site. We are therefore pleased to see that flood risk will be considered further within the ES.

The flood risk vulnerability classification of the proposal is ‘essential infrastructure’, as defined in Annex 3 of the National Planning Policy Framework (NPPF). The Sequential and Exception Tests will therefore be required to be passed, as outlined in National Policy Statement (NPS) EN-1, and National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG). In line with the footnotes to Table 2 of

the PPG, ‘essential infrastructure’ located within Flood Zone 3a should be designed and constructed to remain operational and safe in times of flood.

We note in Chapter 10: Water Environment the relevant main rivers have been identified, and it is confirmed that the Flood Risk Assessment (FRA) will form part of the technical appendix to the ES Report. All sources of flood risk have been identified in Chapter 10, however our focus is on fluvial and/or tidal flood risk.

It is recommended that a sequential approach is taken to the proposed site layout, ensuring all development is located within Flood Zone 1, where possible. Should development be required within Flood Zones 2 or 3, then it should be demonstrated that the infrastructure will remain operational during a design flood plus appropriate climate change allowance, without increasing risk elsewhere.

The flood extents with consideration of climate change throughout the lifetime of the development should be assessed in relation to fluvial and/or tidal flood sources. Tidal sources are currently scoped out, however in the absence of an assessment of tidal flood modelling including climate change impacts it cannot be certain that the site is not affected.

If any development is to be located within Flood Zone 3, then an assessment of the floodplain loss should be made and floodplain compensation provided. This should include the cumulative volume of the stanchions in which solar panels are mounted upon. Any critical electrical equipment/essential infrastructure should be set above the predicted flood levels, e.g. the 0.1% annual probability flood level where achievable.

We would advise that the Battery Energy Storage Systems are located in areas of the site with the lowest risk of flooding, where possible (i.e. Flood Zone 1).

If buildings will be required, finished floor levels should be raised as high as practicable above ground levels and ensure that any occupants are kept safe in a flood event.

Witham Washlands Flood Storage Area is not considered in detail but is shown on Figure 10-3 as Flood Storage Area). However, we welcome the reference (10.6.14) to the Lincoln Flood Alleviation Scheme (aka the Witham Washland flood storage area) and that the development should be setback from this area. Development should be avoided in this area and it should not compromise its function.

With regards to the boundary crossing of the Witham Washland Flood Storage Area, early engagement is paramount as there are specific legal agreements in place regarding the operation, arrangements, agriculture and land ownership within the Witham Washlands. We are unclear at this point whether the cable will go under the Washlands or solar arrays are proposed within the Washlands. We therefore request further clarity on this. The applicant is therefore advised to engage with ourselves and the landowners in this regard. The applicant should contact our local Customers and Engagement Team (LNenquiries@environment-agency.gov.uk) for more information.

Within the operation section at 10.5.7 it refers to potential permanent physical impacts to watercourse if crossings are required for access and impacts on the rate and volumes of runoff entering the watercourses. We would need more information regards these statements and the likely impact this may have on both watercourses.

The proposed cable routes crossing the main rivers however may be suitable to satisfy the exemption known as Flood Risk Activity 3: Service crossing below the bed of a main

river not involving an open cut technique. This exemption can be located on the gov.uk website: Exempt flood risk activities: environmental permits - GOV.UK (www.gov.uk). We would encourage the applicant to follow the set criteria of this exemption to carry out any service crossings of the Main Rivers. If the applicant feels they cannot satisfy the criteria set out in FRA3 a flood risk bespoke permit will be required.

The applicant has not identified the flood defences (type, position, condition, geometry, etc) within their site. We need to understand how these could be affected and whether they protect the proposal for 75 years (required by NPPF).

The FRA should also consider flood risk impacts of decommissioning and the subsequent state of the floodplain. We note that the applicant intends to produce an outline Decommissioning Environmental Management Plan (DEMP), that should be informed by the flood risk assessment. We will require sight of the DEMP to enable us to consider the flood risk impacts and how the floodplain will be returned to its natural state thereafter, and we note it will take approximately 6-12 months to decommission the site and return the area back to its previous state. Early engagement on this issue would be advisable.

The applicant is advised to contact us to request our flood risk data to inform their FRA. However if the applicant intends to undertake any of their own hydraulic modelling (e.g. to take into account correct climate change allowances) we should be contacted at the earliest opportunity to discuss any modelling requirements and to avoid any issues which may present a risk to the project.

We also have the following comments on specific sections of the Scoping Report:

Chapter 3: Description of the Proposed Development

Paragraph 3.2.1
Fencing should not inhibit safe ingress and egress in a flood scenario e.g., for general public and operators on site.

Paragraphs 3.2.2 and 3.2.44
Temporary construction compounds should be positioned outside of the Witham Washland flood storage area, setback from flood defences and positioned outside of Flood Zones 2 and 3. We will require more information about the temporary roadways and their proximity to flood defences.

Paragraph 3.2.13
Consideration of vibration from construction e.g., for frame which may consist of driven piles, screw anchors, or the installation of concrete blocks.

Paragraphs 3.2.15-21
An understanding of how the proposed structures (64 inverters, 64 transformers, 64 switchgears, and three substations may affect the topography and whether this will adversely affect the current Flood Zones, shown in Figure 2-1b or future Flood Zones within the (assumed) design-life 75 years.

Paragraph 3.2.22
Vibration from horizontal directional drilling in close proximity to the flood defences should be considered.

Cont/d..

Paragraph 3.2.26
Underground trenches/cables should be setback from the flood defences. Vibrations in close proximity to the flood defences from micro-tunnelling, boring, or horizontal directional drilling should be considered.

Paragraph 3.2.35
We will require clarity on the proposed access routes to be utilised, where there will be modifications or the addition of new access routes (e.g., six-metre-wide route for Heavy Goods Vehicles, 3.5-metre-wide route). It would be helpful to understand how this may affect the topography and flood storage volume.

Paragraph 3.2.37
To ensure flood resilience it would be advisable to raise the 192 batteries which comprise the Battery Energy Storage System (BESS) above flood levels with the inclusion of freeboard.

Paragraph 3.2.40 and Table 3-1
We need clarity on where the minimum proximity will be measured from in the context of waterbodies or watercourses e.g., most landward extent of the flood defence. We would require more information about the exceptional cases i.e., access tracks, security fencing and/or connection routes.

Paragraph 3.2.44
There should be no net loss of flood storage volume from the landscaping or construction of new access roads/tracks. The developer should consider alternatives to culverts as they may pose a flood risk (e.g., blockages, difficult to inspect, limited flow rate. The developer may need to utilise the 'Culvert, screen and outfall manual' (C786F).

Paragraphs 3.2.50, 3.2.53 and 6.4.9
As the operational life of the Proposed Development has not been specified the Applicant should assume 75-years in line with PPG for non-residential development.

Paragraph 3.2.54
We note Policy S14 of the Central Lincolnshire Local Plan Adopted April 2023, which states that: *"Permitted proposals will be subject to a condition that will require the submission of an End of Life Removal Scheme within one year of the facility becoming non-operational, and the implementation of such a scheme within one year of the scheme being approved. Such a scheme should demonstrate how any biodiversity net gain that has arisen on the site will be protected or enhanced further, and how the materials to be removed would, to a practical degree, be re-used or recycled."*

Chapter 6: Environmental Impact Assessment Methodology

Paragraph 6.4.5
The 2-year construction programme scenario may not be the worst-case timeline for all environmental parameters proposed to be assessed. The applicant should make this assertion on a case-by-case basis or consider all possible phasing scenarios.

Chapter 7: Climate Change

Paragraph 7.5.6 and Table 7-2
The In-combination Climate Change Impacts (ICCI) for an increase in precipitation may need to be considered owing to the significance of the Witham Washlands flood storage

Cont/d..

area in protecting Lincolnshire. The arrays of solar panels may increase the rate of run-off as they form an impermeable surface and will cover a significant area and in combination with the “wetter” winters. The applicant should provide an evidence-based justification for scoping out sea level rise that considers the whole lifetime of the development which should be assumed to be 75 years (e.g., from the tidal river Trent). The assessment should be quantitative (no method has been proposed).

Paragraph 7.7.1 and Table 7-5
See above and which suggests that sea level rise and precipitation may need to be scoped in depending on the evidence presented for ICCI. Similarly, consideration may also need to be provided for the Climate Change Resilience Review for sea level rise and precipitation depending on the evidence presented to demonstrate that these parameters are negligible for the lifetime of the development.

Chapter 10: Water Environment

Table 10-1
- It is unclear how the applicant has derived the pre-development flood risk designation of “High”. The applicant should clarify whether this is the likelihood of flooding that is being considered and what the threshold for “High” would be in terms of a quantitative analysis. It is not clear if the vulnerability of receptors has been considered in this analysis.
- Is the designation of “High” is representative of the whole site given that some areas are within Flood Zone 1?
- What is the evidence that site outside tidal flood extent including climate change impacts?
- Are there any residential receptors within the redline boundary and is Less Vulnerable an appropriate designation?

Paragraph 10.5.3
Proposal should not increase flood risk.

Paragraphs 10.5.5 and 10.5.6
We would require more information about the proposed open-cut excavation across watercourses. We require an understanding of how the HDD will be achieved without adversely affecting flood defences e.g., a consideration of proximity and vibration. The Applicant may need to assess the rate of erosion at the proposed sections of crossing.

Paragraph 10.5.7
Proposed permanent hydrological changes may need to be modelled.

Paragraph 10.6.13
The applicant assumes no above ground infrastructure for cables, but this is yet to be determined.

Paragraph 10.6.14
We welcome reference to the Lincoln Flood Alleviation Scheme (aka the Witham Washland flood storage area) development should be setback from this area.

Paragraph 10.6.15
We may find the proposal unacceptable if proposed within an area at risk of flooding and this will necessitate hydrological modelling. Flood storage compensation should be local, level-for-level, volume-for-volume, and lead to a net-gain in storage volume.

Paragraphs 10.6.17 and 10.8.3
The impact assessment should also consider the effect of flood risk on the proposal and any subsequent consequences during construction, operation, and decommissioning e.g., power outage during operation from flood event.

Paragraph 10.6.21
Assessment of flood risk should be quantitative (where possible).

Paragraph 10.8.4
10 metres would more appropriately be measured from the most landward extent of the flood defence or bank. The buffer zone also helps to ensure that development is sustainable and that the flood defences are not adversely affected by the proposed works.

Paragraph 10.8.6
We welcome engagement about the proposed modelling required.

Paragraph 10.8.7
Where the Applicant is required to assess assets (e.g., flood defences), this may necessitate the clearance of vegetation. We may require a survey of flood defences within the environs.

Paragraph 10.8.9
We may need to understand how the Applicant may be proposing to change levels and how this could affect flood risk.

Paragraph 10.8.10
Any activity which could have an adverse impact on flood risk should be included.

Chapter 11 Landscape and Visual Amenity

Landscaping may change flood flow routes. We require more information about the changes in land level and how this may affect flood risk.

Chapter 12 Noise and Vibration

The Applicant should consider the effects of vibration on flood defences (as the receptor) utilising relevant guidance e.g., British Standards mentioned in 12.8.3. This should consider plant, works, increase in nearby traffic for all stages of the development (construction, operation, and decommissioning).

Paragraph 12.7.1 and Table 12-6
Construction traffic vibration should be scoped in if in close proximity to flood defences. Similarly for operation of the proposed development.

Paragraph 12.8.3
The applicant must consider vibration from building works e.g., piling for network connection etc.

Chapter 14 Traffic and Transport

If access routes are in close proximity to flood defences, we will need more information to consider whether the proposal is acceptable. We may require that the Applicant carry out a pre- and post-works assessment of the flood defences necessitating remediation

Cont/d..

of defects. There may need to be an assessment of vibration in relation to the increase in traffic (from circa 50 HGV per day or plant).

Chapter 15: Other Environmental Topics

Table 15-1

- Flood: Safe for its lifetime will require a demonstration for 75 years from the date that construction is completed. Note that the development should not increase flood risk elsewhere.
- Flood Defence Failure: We may require an assessment the flood defence condition.

Table 17-1

- Climate change: In the absence of any assessment of modelled flood data, we would advised that sea level rise and precipitation are scoped in, as discussed above.
- Flood Risk, Drainage and Surface Water: Where possible flood risk should be assessed quantitatively rather than qualitatively.
- Landscape and Visual Amenity: Where changes in levels are proposed these should be assessed in relation to impacts on flood risk on site and elsewhere.
- Noise and Vibration: Ground-borne vibration from the construction, operation and decommissioning of the Proposed Development should be included. Applicant needs to demonstrate that work will be safe for the flood defences.
- Transport and Access: We need to see the access routes in relation to the flood defences. Routes have not been identified so we cannot say yet whether this is a risk.

ENVIRONMENT AGENCY LAND

There is an area of land owned by the Environment Agency in relation to the Witham Washlands Flood Storage Area within the scoping area. It is unclear at this stage whether this land will be affected by the proposals, but we would welcome on-going discussions with the applicant about this.

ECOLOGY

We are generally satisfied with the information provided and proposed scope, insofar as it relates to our remit. We have the following comments:

We are pleased to see that green infrastructure has been mentioned and the development will be trying to maintain what natural green corridors are already in place, however we advise that the same approach for is used for blue infrastructure.

Paragraph 3.2.39
It is stated that existing natural features will be retained with the layout of the solar arrays, with the exception of small breaks and/or crossings required for new access tracks, security fencing and connection routes, and that new breaks will be kept to a minimum. We welcome this, but any loss of will need to be replaced and enhanced to mitigate the temporary derogation.

Table 3-1
It is stated that watercourses will have a 10 metre offset to the development. We welcome this but request that that the 10 metre set back is measured from the top of bank of the watercourses. Furthermore, the use of offset/buffers to provide embedded

Cont/d..

mitigation via hedgerow or wildflower planting is also welcomed, but riverside buffers should ideally also include tree planting to provide future shade for climate change adaptation and woody material for habitat provision. However, any tree planting along any main rivers must not restrict our access to carry out essential maintenance and/or improvement works, and is likely to be subject to flood risk activity permitting. As such, early engagement is advised.

Buffer zones should be designed and managed for the benefit of biodiversity and should be undisturbed by development with no fencing, footpaths or other structures. It should not include formal landscaping, and should include the planting of locally appropriate native species. Mowing regimes should be low intensity, allowing plants to flower. Light spill within the buffer zone from external artificial lights should be kept at an absolute minimum and be located and directed so that light levels of 0-2 lux are maintained. The buffer zone will help provide more space for flood waters, provide improved habitat for local biodiversity and allows access for any maintenance requirements.

Paragraph 3.2.44
It is indicated that construction activities will include crossing points over drainage ditches. The design of bridges and culverts will need to be carefully designed to avoid ecological, geomorphological and flood risk impacts. Any crossings over main rivers are subject to flood risk activity permitting. If non-main rivers are affected the consent of the Lead Local Flood Authority would be required.

Paragraph 3.2.47
We welcome the commitment to achieving BNG via creation of native grassland wildflower mixes, hedgerows and woodland, however we would like to also see more tree planting, wetland creation, river restoration and a commitment to regular (e.g. every 5 years) ecological auditing to provide data to the Local Ecological Records Centre.

Paragraphs 3.2.50 and 3.2.52
The management of vegetation should include the management of ecologically valuable habitats to maintain and/or enhance their ecological value.

Paragraph 3.2.54
We have concerns regarding the intention to remove any protected species (subject to appropriate surveys and licences) if they are considered to act as a hinderance to future agricultural use. It appears that the developer has approached the landowners and suggested that the land will be free to be used post-decommissioning however they (or their descendants) wish for agricultural use. Protected species legislation is very limited and can only have chance of protecting something when one knows it is present. This means that significant areas of enhanced habitat, such as wildflower strips could be destroyed by ploughing/fertilising, etc. If this is the case, the 10% biodiversity net gain intention will be a temporary uplift (albeit very long-term 40 years) and it would be a major biodiversity impact if significant areas of valuable habitat were lost after decommissioning.

Perhaps the only way of protecting enhanced/created habitat indefinitely would be if they, in time, qualified as statutory designated sites. For that to happen Natural England would require ecological records of the habitats/species found hence our suggestion above (regarding paragraph 3.2.47) for a commitment to regular ecological auditing. I think this may be something we need to raise with LPA not the applicant because they applicant at this stage is effectively providing the 10% BNG voluntarily they may be more reluctant if they think there could be future restrictions placed on the land via

Cont/d..

designations.

As such, we advise further discussions with Natural England in this regard.

Paragraph 3.2.61
We welcome the use of multifunctional spaces to deliver multiple benefits to biodiversity, carbon savings, water and flood management, and green spaces.

Chapter 9: Ecology

Table 9-2
The development includes several locally designated floristically diverse calcareous grass verges, mostly identified in Lincolnshire Wildlife Trust's Life on the Verge project.

The development should seek to support the management of these sites to facilitate their existing value, encourage their expansions and consider using them as donor sites for seeding new meadow bank creation within the site for biodiversity net gain.

Operation/Mitigation and Enhancement
The development should seek to design the layout and land management to maximise beneficial impacts wherever possible, e.g. creation/management of natural habitat buffers, conservation grazing, and so on.

Section 9.7
If it is proposed to scope out the attraction of aquatic invertebrates to the solar panels, we would recommend the incorporation of embedded mitigation by way of wet woodland marginal planting wherever solar panels will be 10m from a watercourse or pond.

Chapter 10: Water Environment

We welcome the proposed surface water drainage strategy, flood risk assessment and a WFD assessment. Given that waterbodies within the study area are classified as Heavily Modified Waterbodies and are failing to achieve Good Ecological Potential due to:

- poor nutrient management
- poor livestock management
- sewage discharge (continuous)
- physical modification
- urbanisation.
- poor soil management
- riparian/in-river activities
- surface water abstraction

Any enhancement on watercourses within the development area that could address these issues should be incorporated as WFD and/or biodiversity mitigation, this will then provide embedded mitigation for any potential detrimental impact imposed by the cable crossings from the construction of the development.

Paragraph 10.3.8

Given Policy S21 (Flood Risk and Water Resources) of the Central Lincolnshire Local Plan and the presence of flood storage areas and flood zones 2 and 3 within the development site, the proposal should incorporate enhancements to watercourses and

drainage infrastructure within the development footprint to improve natural processes, ecology, geomorphology, ecosystem services, flood storage and water quality.

Biodiversity net gain

We support the applicant's intention to provide a minimum of 10% biodiversity net gain (BNG) as part of the proposals. New developments should not only protect watercourses and their riparian corridors, but also provide overall net gain for biodiversity. Net gain for biodiversity is defined as delivering more or better habitats for biodiversity and demonstrating this through use of the latest Defra Biodiversity Metric. It encourages development that delivers biodiversity improvements through habitat creation or enhancement after avoiding or mitigating harm.

This approach is supported by section 4.5 of Overarching National Policy Statement (NPS) for Energy (EN-1), and paragraphs 174 and 179 of the National Planning Policy Framework (NPPF).

The Environment Act 2021 looks to ensure that the overall impact from development on the environment is positive. The Act includes measures to strengthen local government powers in relation to net gain and a minimum requirement of 10% biodiversity net gain. Although we recognise that provision of BNG is not yet mandatory for Nationally Significant Infrastructure Projects, we encourage the applicant to consider an approach to development that results in measurable net gains in biodiversity, having taken positive and negative impacts into account.

The enhancement of biodiversity in and around development should be led by a local understanding of ecological networks, and should seek to include:

- habitat restoration, re-creation and expansion;
- improved links between existing sites;
- buffering of existing important sites;
- new biodiversity features within development; and
- securing management for long term enhancement

The Planning Practice Guidance (PPG) provides guidance on the application of net gain and Institute of Ecology and Environmental Management, together with CIRIA and the Institute of Environmental Management and Assessment have published guidance on how to deliver net gain in practice. These can be downloaded here.

For any BNG proposals which affecting main rivers, the applicant should consult us at the earliest opportunity.

River naturalisation and culverted watercourses

There may be opportunities to remove existing ordinary watercourse culverts as part of the proposal. De-culverting and river restoration will provide environmental improvements and contribute to the delivery of BNG, will help deliver Water Framework Directive (WFD) improvements and will also reduce the risk of flooding. We strongly recommend you consider all options to remove any culverted sections of watercourses as part of your development proposals, restoring watercourses to their natural state. If de-culverting is not possible we would expect to see adequate evidence for this. Works that affect the ordinary watercourses may require the prior consent of the Lead Local Flood Authority (LLFA).

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GROUNDWATER AND CONTAMINATED LAND

In relation to the protection of controlled waters, we have paid particular attention to Chapter 10 Water Environment and Section 15.4 Ground Conditions (Chapter 15 Other Environmental Topics.

Due to the very large scale of the proposed scheme (including the cable route corridor options) the site is underlain by several geological formations. The main bedrock formations are the Scunthorpe Mudstone Formation, Chartmouth Mudstone Formation and Lincolnshire Limestone Formation. The mudstones are both classified as Secondary B aquifers while the limestone is a Principal aquifer.

Various superficial deposits overlie the bedrock, although in some locations the superficial deposits are absent. The superficial deposits include the Fulbeck Sand and Gravel, Balderton Sand and Gravel, alluvial and river terrace deposits. These are all classified as Secondary A aquifers. Head deposits, classified as Secondary (undifferentiated) aquifer, are also present.

Part of the cable route corridor options boundary is also within groundwater Source Protection Zone (SPZ) 3

We are satisfied with the topics that have been scoped out of requiring further assessment and provide further comments on Chapter 10 and section 15.4.

Chapter 10: Water Environment

This chapter relates to the potential effects of the Proposed Development on the water environment, including groundwater. This includes the groundwater in the Secondary and Principal aquifers beneath the site, as well as the groundwater source protection zone 3 in the east of the site.

Section 10.5.6 discussed the use of horizontal directional drilling (HDD) for the crossing of watercourses. This work could involve the use of drilling muds and their use may require risk assessment to ensure they do not pose a risk to controlled waters. The potential to use HDD techniques should therefore be included in the EIA. This is particularly important if it will be used in the Source Protection Zone (SPZ) 3.

The report mentions that a drainage strategy will be compiled for the scheme. The strategy should include measures to prevent pollution. This is particularly important in the areas of the site that are underlain by a Principal aquifer and within the SPZ. The strategy should ensure that any proposed used of sustainable drainage systems (SuDS) is in line with the available guidance on GOV.UK: Sustainable drainage systems: non-statutory technical standards – GOV.UK (www.gov.uk).

'The Environment Agency's approach to groundwater protection' sets out where SuDS drainage is acceptable in relation to controlled waters. The applicant should be particularly mindful of policy G9 in relation to deep bore soakways.

Section 15.4 Ground Conditions

This section states that a preliminary risk assessment will be prepared in line with our Land Contamination Risk Management guidance. Information from the Preliminary Risk Assessment (PRA) will be used to inform any pollution prevention measures that may be required during construction and operation, and these will be included in the

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Construction Environmental Management Plan (CEMP).

We are satisfied with the proposed way forward and assessment methodology. Although not mentioned in this chapter, the report does discuss the construction methods of parts of the scheme. Paragraph 3.2.13 states that, “The frames upon which the solar PV panels will be mounted will be pile driven or screw mounted into the ground to a typical depth of approximately 1.5m, subject to ground conditions.”

Paragraph 3.2.22 discusses the cable installations which may be in trenches or via the use of horizontal directional drilling. Where the placement of the cables and piles takes place in land affected by contamination the management of the waste material will need to be carefully managed. Their use, and the prevention of mobilisation of contamination as a result, should be included in the CEMP.

If horizontal directional drilling (HDD) is used for the installation of cables this work could involve the use of drilling muds and their use may require risk assessment to ensure they do not pose a risk to controlled waters. The potential to use HDD techniques should therefore be included in the CEMP if it is likely to be an option. This is particularly important if it will be used in the SPZ 3.

Groundwater protection guidance

We would refer you to our groundwater position statements at https://www.gov.uk/government/publications/groundwater-protection-position-statements. This publication sets out our position for a wide range of activities and developments, including:

- Waste management
- Discharge of liquid effluents
- Land contamination
- Drainage (soakaways and disposal to ground)

WATER QUALITY AND WATER RESOURCES

Chapter 10: Water Environment

We are satisfied with the proposed scoped of the EIA and pleased to see the developers will be following mitigation measures and good practice during construction, operation and for any decommission phase. All efforts must be undertaken to not deteriorate the water quality or hydrology of any water bodies during construction or operation.

Foul drainage

Government guidance contained within the national planning practice guidance (water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered in the following order:

1. Connection to the public sewer
2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation)
3. Septic Tank

Paragraph 3.2.51 mentions that there would be 4 permanent staff members on site with

up to 20 people on site at any one time. Our preferred option of those mentioned in paragraph 10.8.12 would be to connect foul drainage to the public main sewer, which would require co-ordination and discussions with Anglian Water. The other options may require an environmental permit (please refer to advice further below).

Whichever approach the developer undertakes, this should be explained in full in a foul drainage document. A foul drainage plan should be produced to accommodate any foul flows.

WASTE

Hazardous waste – solar panels

We have specific concerns regarding the manufacture and design specification of the solar panels. Some types currently coming to the end of their working life are classified as hazardous waste, and are considerably more expensive, and difficult, to dispose of. This should be taken into consideration and we would recommend that the developer uses fully recyclable non-hazardous panels.

Waste management

The developer must apply the waste hierarchy as a priority order of prevention, re-use, recycling before considering other recovery or disposal options. Government guidance on the waste hierarchy in England can be found at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf

Site Waste Management Plans (SWMP) are no longer a legal requirement, however, in terms of meeting the objectives of the waste hierarchy and your duty of care, they are a useful tool and considered to be best practice.

In order to meet the applicant's objectives for the waste hierarchy and obligations under the duty of care, it is important that waste is properly classified. Some waste (e.g. wood and wood based products) may be either a hazardous or non-hazardous waste dependent upon whether or not they have had preservative treatments.

Proper classification of the waste both ensures compliance and enables the correct onward handling and treatment to be applied. In the case of treated wood, it may require high temperature incineration in a directive compliant facility. More information on this can be found here: https://www.gov.uk/how-to-classify-different-types-of-waste

The circular economy is a concept designed to keep materials in use as long as possible, thus promoting resource efficient practice and deriving economic benefits. Adherence to the waste hierarchy and adoption of best practice in relation to site waste management planning will help you deliver against circular economy objectives.

Observance of the waste hierarchy objectives and principles of the circular economy will depend upon the selection of the most sustainable option at every phase of a development project, from reduction through design and architecture, to the selection of the most efficient recovery process for the treatment and use of waste.

Where a development involves any significant construction or related activities, we would recommend using a management and reporting system to minimise and track the fate of construction wastes, such as that set out in PAS402: 2013, or an appropriate

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equivalent assurance methodology. This should ensure that any waste contractors employed are suitably responsible in ensuring waste only goes to legitimate destinations.

Waste to be taken off site

Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12 month period the developer will need to register with us as a hazardous waste producer. Refer to our website at www.gov.uk/government/organisations/environment-agency for more information.

Waste on site

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.
The Environment Agency recommends that developers should refer to our:

- Position statement on the Definition of Waste: Development Industry Code of Practice and;
- website at https://www.gov.uk/government/organisations/environment-agency for further guidance

If materials that are potentially waste are to be used on-site, the applicant will need to ensure they can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) (c)) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc…' in order for the material not to be considered as waste. Meeting these criteria will mean waste permitting requirements do not apply.

Where the applicant cannot meet the criteria, they will be required to obtain the appropriate waste permit or exemption from us

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A deposit of waste to land will either be a disposal or a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as:

- any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.
- We have produced guidance on the recovery test which can be viewed at https://www.gov.uk/guidance/waste-recovery-plans-and-permits#waste-recovery-activities.

You can find more information on the Waste Framework Directive here: https://www.gov.uk/government/publications/environmental-permitting-guidance-the-waste-framework-directive

More information on the definition of waste can be found here: https://www.gov.uk/government/publications/legal-definition-of-waste-guidance

More information on the use of waste in exempt activities can be found here: https://www.gov.uk/government/collections/waste-exemptions-using-waste

Non-waste activities are not regulated by us (i.e. activities carried out under the CL:ARE Code of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the WFD). The 'Is it waste' tool, allows you to make an assessment and can be found here: https://www.gov.uk/government/publications/isitwaste-tool-for-advice-on-the-by-products-and-end-of-waste-tests

Please also see further waste permit information below.

AIR QUALITY

Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended).

Use of low emission technology will improve or maintain air quality and support LPAs and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority, which is usually the local authority.

The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation, this advice should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps,

piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application.

CONTROL OF MAJOR ACCIDENT HAZARDS (COMAH) SITE

Together with the Health and Safety Executive (HSE), the Environment Agency is part of the COMAH Competent Authority (CCA).The applicant should be aware that the development site is within 250 metres of a COMAH site at Morton Hall, however in this instance we have no comments to make in relation to environmental issues.

ENVIRONMENTAL PERMITTING REGULATIONS / ENVIRONMENT AGENCY CONSENTS

There are a number of additional permits or consents that the applicant may require under the Environmental Permitting Regulations (EPR), or other legislation, to regulate matters such as flood risk, discharge of effluent / wastewater, water abstraction, watercourse impoundment and waste management. This is discussed below.

Flood Risk Activity Permit

The proposal has the potential to impact statutory main rivers. The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03708 506 506. We advise that the applicant consults with us at the earliest opportunity where the proposal

Where a Flood Risk Activity Permit (FRAP) is required, it is unlikely that our consent will be granted for works that do not allow access for maintenance or repair purpose or that have an unacceptable impact on flood risk or the natural environment. The permanent retention of a continuous unobstructed area is an essential requirement for emergency access to the river for repairs to the bank and for future maintenance and/or improvement works.

Where development or works are proposed that would require a FRAP, it is recommended that detailed pre-application planning advice is obtained from us any concerns can be resolved up front.

There is no mention at this stage regarding whether the applicant will seek to disapply The Environmental Permitting Regulations in regard to flood risk activities. Whilst disapplication is common practice in DCO proceedings, we still require to be formally notified of this intention. If disapplication is formally notified to us, we still require discussions with the applicant around the proposals and will secure our interests by way

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of approval of plans through Protected Provisions. There is no guarantee that we will agree to disapply EPR.

Dewatering / Abstraction

If dewatering is required, it may require an environmental permit if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works.

Temporary dewatering from excavations to surface water: RPS 261 – GOV.UK (www.gov.uk)

If they don't meet the exemption and require a full abstraction licence they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found here: Abstraction licensing strategies (CAMS process) – GOV.UK (www.gov.uk)

Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service (NPS) early in the project planning.

Discharge of water

Where it is not possible to connect foul drainage to the main sewer, under the Environmental Permitting Regulations 2010 any discharge of sewage or trade effluent made to either surface water or groundwater will need to be registered as an exempt discharge activity or hold a permit issued by the Environment Agency, addition to planning permission. This applies to any discharge to inland freshwaters, coastal waters or relevant territorial waters.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. If the developer identifies the need to discharge to surface water during construction, then a permit may also be required. More information can be found here: https://www.gov.uk/guidance/discharges-to-surface-water-and-groundwater-environmental-permits

A permit does not mean they can deteriorate the watercourse and may not be granted. Only clean, uncontaminated water should be discharged to surface water or groundwater and any permits need to be planned for well in advance of construction.

Discharging run-off to watercourses has the potential to transport pollutants such as herbicides/ pesticides/ nitrates/ phosphates and silt and should be a last resort with mitigation in place to reduce the impact.

Additional guidance in relation to discharging and permits is available at the following links:

- https://www.gov.uk/guidance/discharges-to-surface-water-and-groundwater-environmental-permits
- https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit

The use of drilling muds for the directional drilling may require a groundwater activity

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permit unless the ‘de minimis’ exemption applies. Early discussion about this is also recommended.

Waste

Any development using waste or other material for engineering works may require an Environmental Permit, unless it is exempt from the need for a permit. If a permit is required, it must be obtained prior to commencing the activity and the applicant should allow three months for the determination of a standard rules permit and four months for the determination of a bespoke permit. For further advice please visit GOV.UK (https://www.gov.uk/topic/environmental-management/waste).

Further Environment Agency advice – note to the applicant

Should the applicant wish us to review any technical documents or want further advice to address the environmental issues raised, this would fall under our charged for planning advice service outside of statutory consultation.

Further engagement will provide the applicant with the opportunity to discuss and gain our views on the proposals and resolve any issues which may present a risk to the delivery of the project, for example. It should also result in a better quality and more environmentally sensitive development.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The terms and conditions of our charged for service are available here.

We will be unable to offer this service where we consider that a request is unreasonable, goes beyond what we can advise on through our planning remit or where other operational activities and issues prevent us from doing so.

If you would like more information on our planning advice service, including a cost estimate, please contact us at the email address below.

We trust this advice is useful.

If you require anything further, please do not hesitate to contact us at the email address below.

Yours sincerely

Mr Alex Hazel
Planning Specialist – National Infrastructure Team

E-mail: NITeam@environment-agency.gov.uk

End

From:	Squire, Sandra
To:	Fosse Green Energy
Subject:	Fosse Green Energy Scoping Opinion
Date:	05 July 2023 15:37:38
Attachments:	image001.jpg

Thank you for consulting the Forestry Commission on this proposal.

As the Governments forestry experts, we endeavour to provide as much relevant information to enable the project to reduce any impact on irreplaceable habitat such as Ancient Semi Natural woodland, as well as other woodland.

We are satisfied there are no Ancient Woodlands within the proposed site, however Tunman/Housham Ancient Replanted Woodlands are adjacent to the site, on its boundary.

Ancient Woodlands are an irreplaceable habitat. As highlighted in Para 180 (c) of the NPPF. While Nationally Significant Infrastructure Projects are not subject to the NPPF it sets out the importance of these irreplaceable habitats. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

One of the most important features of ancient woodlands is the quality and inherent biodiversity of the soil; being relatively undisturbed physically or chemically it is also a major seed bank. Direct impacts of development that could result in the loss or deterioration of ancient woodland or ancient and veteran trees include:

- damaging or destroying all or part of them (including their soils, ground flora or fungi)
- damaging roots and understorey (all the vegetation under the taller trees)
- damaging or compacting soil around the tree roots
- polluting the ground around them
- changing the water table or drainage of woodland or individual trees
- damaging archaeological features or heritage assets

It is essential that the ancient woodland is considered appropriately to avoid the above impacts.

It is also essential that fuels, chemicals, or waste materials such as topsoil, minerals or hard-core are not stored on ancient woodland soils or under the woodland canopy.

Details should be provided of how the existing trees and woodlands within the site will be protected during the construction phase, protection measures can include taking care not to cut tree roots or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons.

Protection measures can include fencing of Root Protection Zones, Directional lighting to avoid light pollution in the Ancient Woodland, damping down tracks to reduce dust pollution etc.
We also particularly refer you to further technical information set out in Natural England and Forestry

Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and "Keepers of Time" – Ancient and Native Woodland and Trees Policy in England.

There are also numerous small, fragmented woodlands within the development area, many of which are grant funded woodlands that are still in obligation, so it is important these are retained and protected so that public money is not wasted.

Access to the woodlands should also be considered for future management, as woodland management will improve and maintain biodiversity. We would expect to see hedgerows and individual trees within a development site considered in terms of their overall connectivity between woodlands affected by the development.

We note the scoping report suggests woodland will be retained and avoided. New woodland creation will be undertaken for visual screening and to enhance and improve habitat connectivity, and that buffer zones of at least 15m from all woodlands will be created.

We would recommend that planting should be targeted to enhance existing woodland and ecological networks by buffering the existing woodland to create larger blocks of ideally at least 5ha. Species and provenance of new trees and woodland need to be considered to establish a more resilient treescape which can cope with the full implications of a changing climate. When planting new trees and woodland, ensure that biosecurity is robust to avoid the introduction of pests and diseases.

Where possible, a buffer zone should contribute to wider ecological networks and be part of the green infrastructure of the area. It should consist of semi-natural habitats such as woodland or a mix of scrub, grassland, heathland and wetland planting.

If any information is required on woodland planting and management, please do not hesitate to contact me.

Best wishes

Sandra

Sandra Squire

Local Partnership Advisor
East & East Midlands

Tel: [redacted]
[redacted]@forestrycommission.gov.uk

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From:	Allen, Tim
To:	Fosse Green Energy
Cc:	Midlands ePlanning
Subject:	EN010154 – Fosse Green Energy – EIA Scoping Notification and Consultation - Our ref PL00793357
Date:	18 July 2023 18:35:00
Attachments:	image001.jpg image5f6009.JPG

Dear Ms Hicks

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11 Application by Fosse Green Energy Limited (the Applicant) for an Order granting Development Consent for Fosse Green Energy (the Proposed Development)

Thank you for consulting Historic England on EIA Scoping in respect of the above NSIP.

HISTORIC ENGLAND ADVICE

We note the structured approach set out in respect of the Historic Environment and the iterative plan for further investigations.

We welcome a flexible – expertise based approach to setting matters not overly constrained by fixed radii. We refer you to the detailed advice of our County archaeological curator colleagues in particular as regards trial trenching.

As regards the banding of asset importance some flexibility to accommodate the high importance of some grade ii listed assets and the medium importance of some local list entries is recommended.

Without prejudice to other matters which may emerge we note in particular the setting of Somerton Castle and the corridor of the Roman road passing through the site as particular sensitivities.

As general advice the earlier and more thorough site investigations that are made the greater the ability of energy projects to deploy their relatively high degree of elasticity in design such that impacts can be avoided, minimised or effectively mitigated.

We refer you in particular to the following published advice also.

https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/
https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/
https://historicengland.org.uk/images-books/publications/water-features-historic-settings/

https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/

https://historicengland.org.uk/images-books/publications/commercial-renewable-

energy-development-historic-environment-advice-note-15/

yours sincerely

Tim Allen

Tim Allen MA FSA
Team Leader (Development Advice)

Midlands Region
Historic England
The Foundry, 82 Granville Street, Birmingham B1 2LH

Direct Line [redacted]
http://www.historicengland.org.uk/ | @HistoricEngland

From: Muhammad Musa
To: Fosse Green Energy
Cc: Hicks, Lucy
Subject: RE: EN010154 – Fosse Green Energy – EIA Scoping Notification and Consultation
Date: 22 June 2023 17:38:46
Attachments: image001.png
image002.jpg

Hi Claire,

I do not have any comments as far as Environmental Impact concerned but at detailed design stage, if Grid Connection corridor options comes across any of our disused railway structures, I would like to be contacted to assess the impact please. I have already provided you the location plan for the HRE structures in the area.

Regards

Musa

Muhammad Musa
Historical Railways Estate (on behalf of Department for Transport)
National Highways | 37 Tanner Row | York | YO1 6WP
Mobile: [redacted]
Web: www.nationalhighways.co.uk

A tour of the Historical Railways Estate (HRE): [redacted]

Our latest renovation work at Westfield viaduct: [redacted]

From: Fosse Green Energy <FosseGreenEnergy@planninginspectorate.gov.uk>
Sent: Thursday, June 22, 2023 10:14 AM
To: Muhammad Musa[redacted]@nationalhighways.co.uk>
Cc: Hicks, Lucy [redacted]@planninginspectorate.gov.uk>
Subject: FW: EN010154 – Fosse Green Energy – EIA Scoping Notification and Consultation

Dear Musa,

Thank you for getting in touch. The information you need will be within the applicant's scoping report. You can access it either from our National Infrastructure Planning webpage or through the link to the scoping report provided in our consultation letter.

Many thanks

Claire Deery

From: Muhammad Musa [redacted]@nationalhighways.co.uk>
Sent: 21 June 2023 20:00
To: Fosse Green Energy <FosseGreenEnergy@planninginspectorate.gov.uk>
Subject: RE: EN010154 – Fosse Green Energy – EIA Scoping Notification and Consultation

Hi Lucy,

Please find enclosed the approximate location of our structures in the concerned area. I believe the solar energy storage park doesn't interfere with our structures but Grid Connection corridor options have potential of some interference. Would you be able to confirm the exam location of connection corridors please?

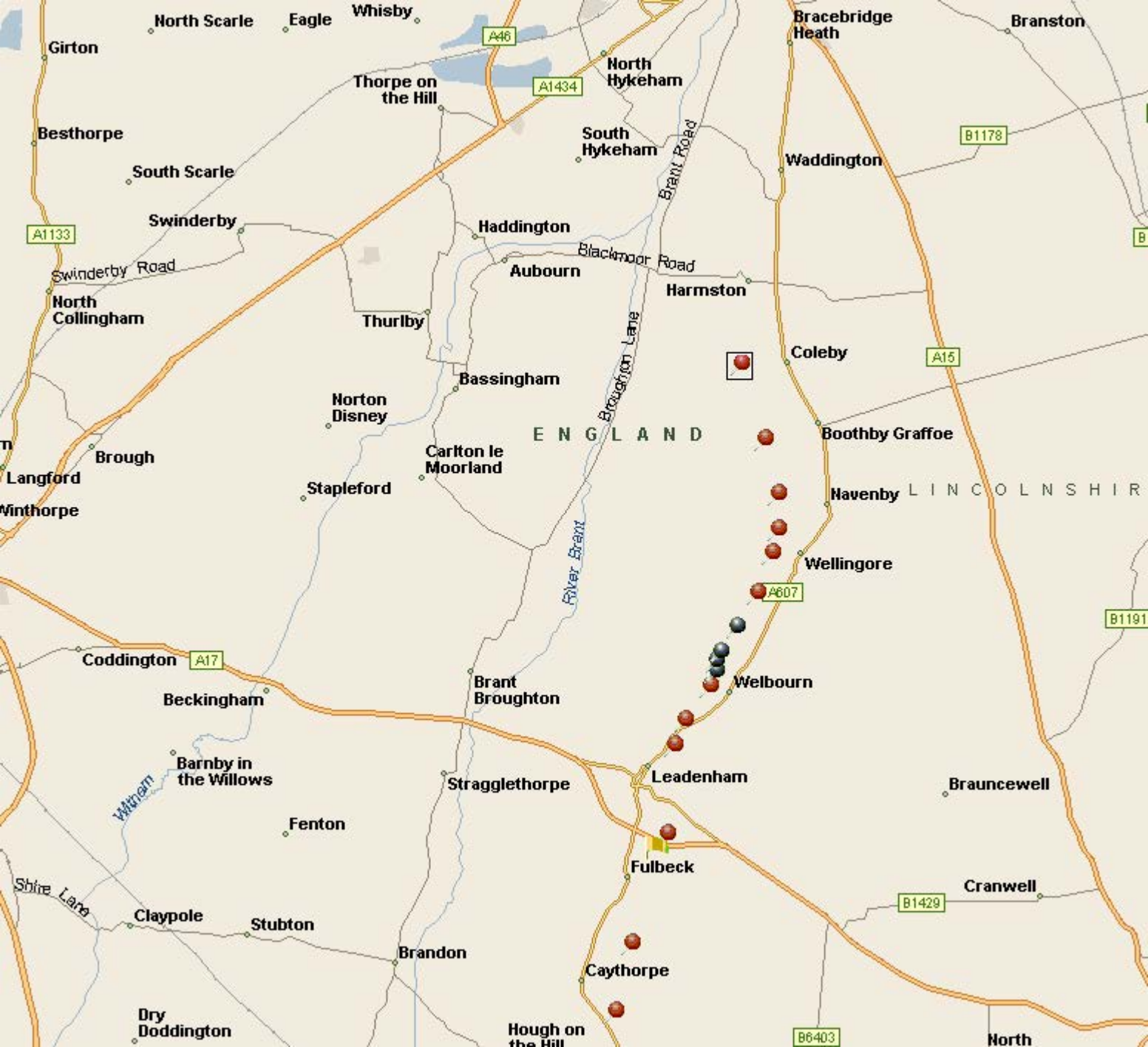
Regards

Musa

Muhammad Musa
Historical Railways Estate (on behalf of Department for Transport)
National Highways | 37 Tanner Row | York | YO1 6WP
Mobile: [redacted]
Web: www.nationalhighways.co.uk

A tour of the Historical Railways Estate (HRE): [redacted]

Our latest renovation work at Westfield viaduct: [redacted]


North Scarle
Eagle
Whisby
A46
Girton
Thorpe on the Hill
A1434
North Hykeham
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Branston
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South Hykeham
B1178
South Scarle
Brant Road
Waddington
Swinderby
A1133
Haddington
Swinderby Road
Blackmoor Road
Aubourn
Harmston
North Collingham
Thurlby
Broughton Lane
Coleby
A15
Bassingham
Norton Disney
ENGLAND
Boothby Graffoe
Brough
Carlton le Moorland
Langford
Stapleford
Navenby
LINCOLNSHIR
Winthorpe
River Brant
Wellingore
A607
B1191
Coddington
A17
Brant Broughton
Welbourn
Beckingham
Barnby in the Willows
Leadenham
Stragglethorpe
Brauncewell
Witham
Fenton
Fulbeck
Shire Lane
Cranwell
B1429
Claypole
Stubton
Brandon
Caythorpe
Dry Doddington
Hough on the Hill
B6403
North

Neil McBride
Head of Planning
Lincolnshire County Council
County Offices
Newland
Lincoln
LN1 1YL
Tel: [redacted]
E-Mail: [redacted]@lincolnshire.gov.uk

17 July 2023

Dear Sir/Madam

PROPOSAL: THE PLANNING INSPECTORATE – SCOPING OPINION UNDER THE INFRASTRUCTURE PLANNING REGULATION 2017 FOR ORDER GRANTING DEVELOPMENT CONSENT FOR FOSSE GREEN ENERGY PARK
LOCATION: THORPE ON THE HILL

Thank you for your letter dated 20th June 2023 and link to Fosse Green Energy EIA Scoping report produced by AECOM dated June 2023.

The Council have reviewed the information provided and have the following comments to make.

The scheme

The scheme proposed would have a generation capacity of upto 350MW and storage capacity using battery storage system of upto 480MW. The application will include the solar PV panels, the battery storage system associated infrastructure and 3 potential grid connection corridors to a yet unconfirmed National Grid sub-station in the vicinity of the A15 Lincoln to Sleaford highway.

Cumulative Impacts

Consideration needs to be given to the other NSIP schemes for solar farms across Lincolnshire. Many of these projects are now at the examination phase so details are available, and therefore the ES should include commentary on the cumulative impacts on the topics included in the ES from resulting from the other solar schemes in the area.

Alternatives

In this section consideration also needs to be given to looking at the benefits of keeping the land, subject of this project, in agricultural use and the impact on food production in the region.

Climate Change (chapter 7)

Request that this chapter includes details on the following matters:

- What is the energy consumption and associated carbon emissions of any battery storage system?
- What are the carbon emissions associated with the solar PV panels themselves – separated into manufacture, operation, and maintenance (and which panels are to be used – poly, multi, single crystal silicon)? Is the embedded carbon associated with the panel manufacture included in any payback of carbon (bearing in mind that the panels are likely to be imported)?
- Power losses and associated carbon footprint of connecting cables to the grid need estimating.
- With regard to greenhouse Gas Emissions this should be directly be compared to the number of years it will take for development to be carbon neutral. However to get a true reflective understanding of the benefits/harm to the environment it should be compared to a least one fossil fuel, nuclear and at least one alternative renewable energy. It is considered that by doing this the clear environmental benefits should be highlighted and allow for careful consideration against the impacts of the development.

Loss of Agriculture

The Council requests this matter should be 'scoped in' and appropriate assessments included as part of the ES.

The ES and Agricultural Land Classification (ALC)assessment should clearly identify how much of the site comprises of agricultural land and identify its ALC grade and current use. The ES should identify what (if any) measures would be taken to retain the agricultural land in productive use (i.e. sheep grazing, hay/silage production) and how this would be secured. The ES should also give consideration to the economic effects of the loss or change to the use of the agricultural land as well as a consideration of the potential carbon footprint created through the displacement or removal of this land from productive use. This needs to be properly calculated to ensure that the full carbon gains or benefits of this proposal are accurate.

The 'alternatives' exercise needs to consider alternative site layouts and potentially a reduction in MW generating capacity in order to demonstrate avoidance or minimisation of agricultural land impacts.

Landscape and Visual Assessment (Chapter 11)

Would expect the production of a full landscape and visual assessment that considers cumulative and residential visual amenity effects. This would be in the form primarily of an LVIA reflects current best practice and guidance from, as a minimum, the following sources:

1. *'*Guidelines *for Landscape and Visual Impact Assessment*', (GLVIA3), April 2013 by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA);
2. *'*An *Approach to Landscape Character Assessment'*, Natural England (2014);
3. *'*Technical *Guidance Note (TGN) 06/19 Visual Representation of Development Proposals'*, 17 September 2019 by the Landscape Institute (LI);
4. *'*Technical *Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)'*, 10 January 2020 by the Landscape Institute (LI) ;
5. *'Technical Guidance Note (TGN) 04/20 Infrastructure',* April 2020 by the Landscape Institute (LI); and
6. Technical *Guidance Note (TGN) 2/21 Assessing landscape value outside national designations*, May 2021 by the Landscape Institute (LI).

We would also expect that through the NSIP process, full engagement and consultation at the Pre-Application stage is carried out to ensure the following are discussed, developed and agreed at subsequent technical meetings:

1. LVIA Methodology;
2. ZTV parameters;
3. Study Area extents (distance);
4. Identification of receptors;
5. Viewpoint quantity and locations;
6. Accurate Visual Representations (AVRs):
   a. Quantity and location;
   b. Type and Level;
7. Mitigation Measures/Landscape Scheme/Site Layout;
8. Cumulative sites and approach; and
9. Residential Visual Amenity Assessment (RVAA) requirements should be considered (based on the Landscape Institute TGN 2/19) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

Minerals and Waste

When reviewing the submitted scoping report, it is noted that in Para 13.7 the impacts upon Minerals Safeguarding Areas have been scoped out. It appears that the consideration of safeguarding has been limited to potential effects upon sites allocated in the Lincolnshire Minerals and Waste local Plan: Site Locations document (2017), namely MS04-LT: Swinderby Airfield, Witham St Hughes and MS05 LT Norton Bottoms Quarry Stapleford. The report fails to take account of Policy M11 of the Core Strategy and Development Management Polices document 2016.

The proposed development is partially located within a Mineral Safeguarding Area (MSA) for both Sand and Gravel and Limestone and is therefore subject to Policy M11 (Safeguarding of Mineral Resources) of the Lincolnshire Minerals and Waste Local Plan: Core Strategy and Development Management Policies - adopted June 2016. The Core Strategy is available to download from the County Council's website: www.lincolnshire.gov.uk. Within a MSA, except for the exemptions set out in Policy M11, applications for non-minerals development should be accompanied by a Minerals Assessment.

A Minerals Assessment should provide an appropriate assessment of the mineral resource, its potential for use in the forthcoming development and an assessment of whether it is feasible and viable to extract the mineral resource ahead of development to prevent unnecessary sterilisation. Where prior extraction of some or all of the mineral can be undertaken, the assessment should also include an explanation of how this will be carried out as part of the overall scheme. The assessment should also assess the potential for proximal sterilisation of mineral resources in adjacent land. Where mineral resources would be sterilised by a proposal, Policy M11 sets out the tests that need to be met in order to enable planning permission to be granted.

The potential sterilisation of mineral resources should therefore be **'scoped in'** to the EIA and addressed through a minerals assessment as part of the ES. We would expect this to be proportionate to the proposals. For developments of this nature there are generally differing impacts from the solar fields and the grid connections. In the first instance there is the potential to sterilise the mineral resource (on site and proximally) as a consequence of the significant land take proposed by the solar panel development. The proposed grid connection corridors, however, may require other factors to be taken into account where the connection options pass through the Mineral Safeguarding Areas. Whilst the final footprint of the grid connection may be limited, by dissecting the MSA it could introduce a constraint to the potential for any future extraction of the sand and gravel / Limestone resources in the surrounding land. The minerals assessment as part of the ES should therefore include consideration of this matter and it should be given due consideration when determining the final route/method of the grid connection.

More detail and justification is required to substantiate the assertion that the amount of waste to be generated during the operation phase is minimal. The longevity of projects such as this are 40 years yet this is proposed for an unlimited time and consequently it can reasonably be assumed that most of the infrastructure necessary for this project will need to be replaced at least once during the operational phase. Currently there are 11 other large solar projects in the County at various stage of the Development Consent Process creating a potential 5000MW of energy. All the infrastructure required for these projects, if approved, would be constructed during a similar timescale and is expected to be replaced at least once during the operational phase putting significant pressure on the County's waste facilities and consequently this topic should be scoped in to set out how this will be addressed.

The Council therefore **disagrees** that the topic of waste is 'scoped out' and a standalone topic on waste should be included to consider the disposal methos of the solar infrastructure that becomes unviable during the operational phase which is particularly

important when considered with the significant number of other solar projects that are emerging in the County both NSIPs and Town and Country Planning Act applications.

Socioeconomic (Chapter 13)

From an economic growth perspective, the range of the topics in the scoping document appears reasonable, and will be able to comment in further detail as the project progresses.

Transport and Traffic (Chapter14)

A Transport Statement, Outline CTMP and Travel Plan will be produced. Standard methodology is proposed for these documents, the operation and de-commissioning phases are to be scoped out (since the impacts will be less than construction). This is an acceptable approach for operation but not for de-commissioning which is the reverse of the construction phase and so impacts could be significant.

Water Environment (Chapter 10)

A FRA and Drainage Strategy is proposed to be submitted within the ES and nothing has been scoped out. This is acceptable and expected approach.

Historic Environment (Chapter 8)

The EIA scoping report sets out the proposed approach regarding Cultural Heritage. We are generally supportive of the programme presented and strongly recommend that the full extent of the proposed impact area including the grid connection corridor options should be included in the evaluation process. Understanding the impact to archaeological remains is dependent on sufficient evaluation being undertaken to inform the selection process and for ensuring the subsequent design and programme of mitigation work is devised with an understanding of the level of archaeological work which may be required before and during the construction phase.

The Environmental Impact Assessment (EIA) will require desk-based research, non-intrusive surveys and intrusive field evaluation for the full extent of proposed impact. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework.

Regarding Section 8.5 Potential Effects and Mitigation we note that while 8.5.2 states that *'there is potential for previously unrecorded archaeological assets to survive within the Site boundary'* there is no mention of the grid connection corridor, and while some construction impacts are listed there is no mention of potential decommissioning impacts.

The full potential impact zone will require geophysical survey as the results are required to identify site-specific archaeological potential and to inform a programme of archaeological trial trenching and subsequent mitigation. Section 8.6.13 states that *'a geophysical survey will be undertaken within areas of the Solar and Energy Storage Park that are suitable for survey and where land access can be obtained by way of landowner agreement. Additional geophysical survey will be undertaken along the Grid Connection Corridor once a single route option has been selected and access has been granted.'*

Strongly recommend that the full suite of standard evaluation techniques including geophysical survey and trenching be undertaken and that the results be used to inform the corridor selection process.

Please do be advised that where geophysical survey is not undertaken a higher percentage of evaluation trenching will be necessary to obtain sufficient baseline evidence to determine archaeological potential and inform the mitigation process to deal with the development's impact within the full impact zone.

Trenching results are essential for effective risk management and to inform programme scheduling and budget management. Failing to do so could lead to unnecessary destruction of heritage assets, potential programme delays and excessive cost increases that could otherwise be avoided. A programme of trial trenching is required to inform a robust mitigation strategy which will need to be agreed by the time the ES is produced and submitted with the Development Consent Order (DCO) application.

The ES will need to contain sufficient information on the archaeological potential and must include evidential information on the depth, extent and significance of the archaeological deposits which will be impacted by the development. The results will inform a fit for purpose mitigation strategy which will identify what measures are to be taken to minimise the impact of the proposal on archaeological remains.

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 states ***"The EIA must identify, describe and assess in an appropriate manner…the direct and indirect significant impacts of the proposed development on…material assets, cultural heritage and the landscape."*** (Regulation 5 (2d)).

Other Environmental Topics

Accidents and disasters should be **scoped in** due to the potential for battery fires from developments of this nature. Therefore consider that there should be a specific chapter on this topic in the ES. In addition include details of crime prevention in respect of major accidents such as sabotage, criminal activity should be assessed as pre-planned damage to the scheme could leave it vulnerable to a major accident.

Glint and glare should be **scoped in** and this should focus on visual impact, highway safety and aviation safety.

The Council will continue to engage with this proposal as required and therefore any further queries, please do not hesitate to get in contact.

Yours faithfully

[redacted]

Head of Planning

From:	.Box.Assetprotection (National Gas)
To:	Fosse Green Energy
Subject:	RE: [EXTERNAL] EN010154 – Fosse Green Energy – EIA Scoping Notification and Consultation
Date:	30 June 2023 09:36:22
Attachments:	image001.png

Good morning,

Thank you for your email.

I have reviewed the Scoping Report on behalf of National Gas Transmission and can confirm that there are no assets impacted by your proposals. Please continue to consult further should the red line boundary change.

Jackie Webb
Asset Protection, National Gas Transmission

+44 (0)800 970 7000
[redacted]@nationalgas.com

National Gas Transmission, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA
nationalgas.com I Twitter I LinkedIn

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Complex Land Rights
Ellie Laycock
Development Liaison Officer
UK Land and Property
[redacted]@nationalgrid.com
Tel: [redacted]

www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
fossegreenenergy@planninginspectorate.gov.uk

11 July 2023

Dear Sir/Madam

APPLICATION BY FOSSE GREEN ENERGY LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE FOSSE GREEN ENERGY (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

I refer to your letter dated 20th June 2023 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET). Having reviewed the scoping report, I would like to make the following comments regarding NGET existing infrastructure within or in close proximity to the current red line boundary.

NGET has existing high voltage electricity overhead transmission lines within the scoping area. The overhead lines form an essential part of the electricity transmission network in England and Wales.

Overhead Lines

4ZM 400kV OHL	Bicker Fen – Spalding North – West Burton
	Bicker Fen – Walpole – West Burton

I enclose a plan showing the location of NGET's apparatus in the scoping area.

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset

- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004)".

- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.

- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.

- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.

- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.

- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.

- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.

- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

National Grid House
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

To download a copy of the HSE Guidance HS(G)47, please use the following link:
http://www.hse.gov.uk/pubns/books/hsg47.htm

Further Advice

We would request that the potential impact of the proposed scheme on NGET's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, NGET is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by NGET. Further information relating to this can be obtained by contacting the email address below.

Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: **box.landandacquisitions@nationalgrid.com**

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

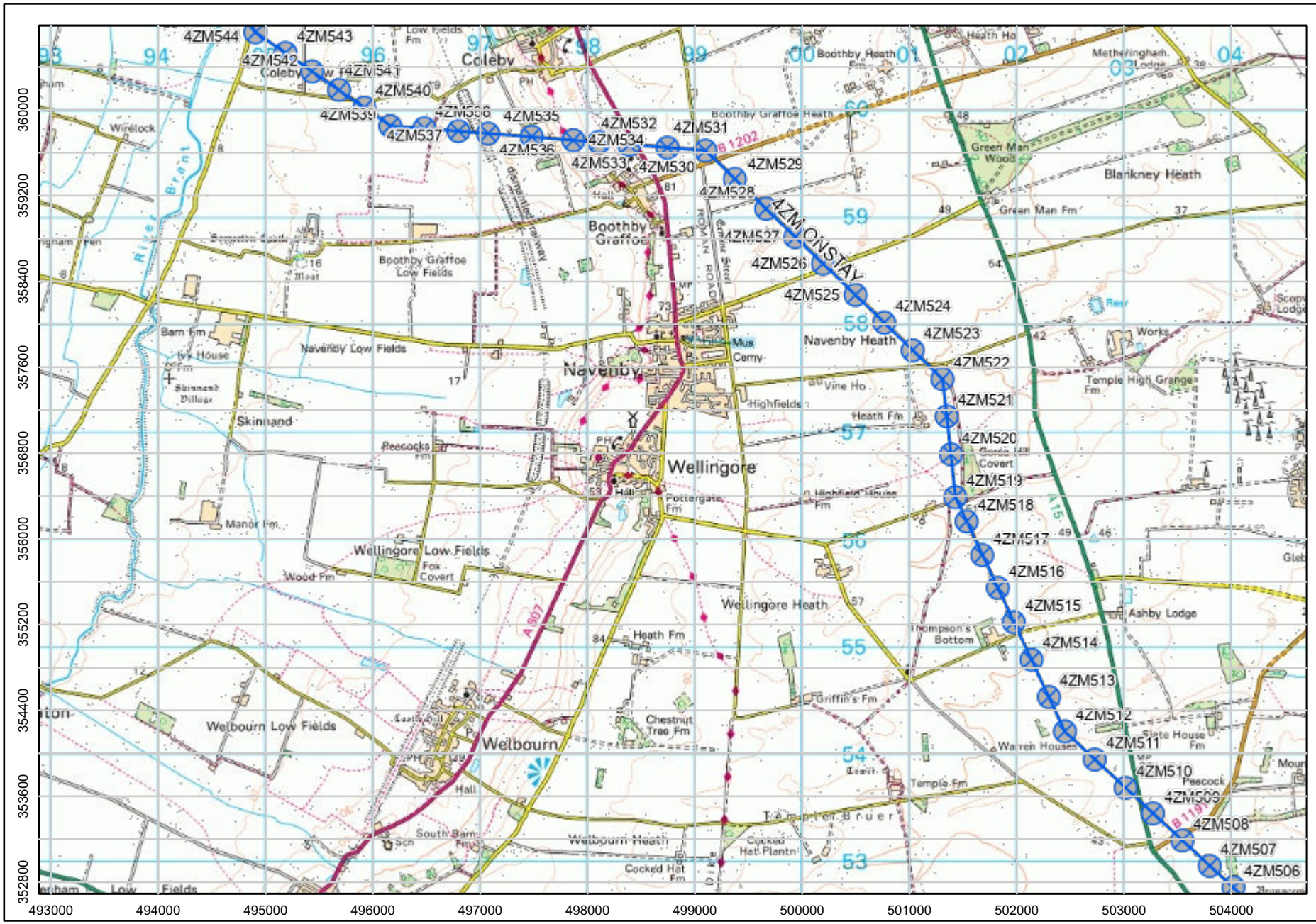
The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity customer services.

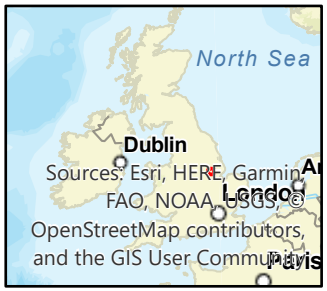
Yours faithfully

E.Laycock

Ellie Laycock
Development Liaison Officer, Complex Land Rights

nationalgrid | Fosse Green Energy NGET Assets





Legend

Fibre Cable

- Fibre Cable Commissioned

Towers

- Towers Commissioned

OHL 400Kv

- OHL 400Kv Commissioned

Notes

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Date: 7/11/2023
Time: 6:25 PM

Page size: A4 Landscape
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Scale: 1:50,000

N

From:	NATS Safeguarding
To:	Fosse Green Energy
Subject:	RE: EN010154 – Fosse Green Energy – EIA Scoping Notification and Consultation [SG35585]
Date:	27 June 2023 10:30:15
Attachments:	~WRD0000.jpg image001.png image002.png image003.png image004.png image005.png image006.png

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Our Ref: SG35585

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

Date: 18 July 2023
Our ref: 439391
Your ref: EN010154

Lucy Hicks
EIA & Land Rights Advisor
Environmental Services Team
Major Casework Directorate

FosseGreenEnergy@planninginspectorate.gov.uk

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Lucy Hicks

Environmental Impact Assessment Scoping consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Fosse Green Energy (Solar and Energy Storage Park).
Location: Not given – but in North Kesteven , Lincolnshire

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 20 June 2023, received on 20 June 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Natural England have not had any pre-application engagement with this project. We consider there to be no known designated site issues; however we consider that the implications for Best and Most Versatile Agricultural Land to be of primary importance for this project, due to land take involved. Natural England's full advice on the scope of Environmental Impact Assessments (EIA) is set out in Annex A below.

We would be happy to comment further should the need arise but if, in the meantime, you have any queries, please do not hesitate to contact us. For any queries relating to the specific advice in this letter please contact me at [redacted]@naturalengland.org.uk. Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely

SANDRA CLOSE

Planning and Environment Lead Adviser – East Midlands Area Delivery

Annex A – Natural England Advice on EIA Scoping

General Principles

1. General Principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided[1].
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES.

From the Scoping report provided, Natural England consider that these general principles have been, or will be, appropriately addressed through the EIA process.

2. Environmental Data

We welcome the information that has already been gathered, including accessing the detailed information on the natural environment available at www.magic.gov.uk.

The following is standard advice to reiterate the sources available:

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx.

[1] National Infrastructure Planning (planninginsepctorate.gov.uk) Insert 2 – information to be provided with a scoping request, Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements

Natural England's Sites of Special (SSSI) Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

3. In-Combination/Cumulative impacts

The Environmental Statement should include in-combination/cumulative assessment cumulative effects. We acknowledge Section 6.6 which notes that a review of other developments will be undertaken, following the identification of a 'zone of influence' (ZOI) of 5km. The approach to in-combination assessment appears suitable and will consider impacts from other development up to 5km away. The list at Paragraph 6.6.12 and the project named at 6.6.13 of other development' at Paragraphs to be included in the assessment of cumulative effects should be reviewed and updated as necessary.

Natural England are aware of a number of other solar projects in the surrounding area. The closest being Springwell Solar Farm to the south east of the project, as acknowledged in the scoping report**.** This, and potentially other solar and NSIPS within Lincolnshire, should be included within the in-combination assessment.

4. Impact of the proposed development on designated sites

Internationally & Nationally designated sites:

- The EIA Scoping report (Paragraph 9.4-5) used a 10km search area for nationally designated sites. Nine were identified in the search area, but none trigger Natural England's IRZs for these. Three were within 5km: Metheringham Heath Quarry SSSI lies 3.7 km to the east; High Dyke SSSI 4km to the south and Swanholme Lakes SSSI 4 km to the north east. Swanholme Lakes (SSSI).

- There are no known hydrological connections between watercourses flowing through the study area to Swanholme lakes, however, we note that this will be confirmed at the next assessment stage.

- International and national statutory ecological designations are currently scoped out with no impact pathways, either directly or indirectly, that would impact upon the integrity or functioning of these statutory designated sites.

- We agree that a Habitats Regulations screening assessment, which rules out the risk of the proposed development from having a significant effect, should be carried out and recorded in the ES.

Locally designated sites:

We note the reference to the Whisby Park Local National Nature (Paragraph 10.4.44) identified with 339M north. The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks identified.

5. Loss of Agricultural Land (BMV)

It is recognised that due to the nature of the solar panels a good proportion of the agricultural land affected by the development will not be permanently lost. However, the report acknowledges that the development may operate beyond the stated minimum 40-year development lifetime and the applicant is not seeking a time limited consent. In order to both retain the long-term potential of this land and to safeguard all soil resources as part of the overall sustainability of the whole development, it is important that the soil is able to retain as many of its essential functions and services (ecosystem services) as possible. Natural England consider that potential for a longer-term loss of agricultural land should also be included within any assessment where the 40-year lifespan is not definite.

Paragraph 2.2.2 states that Natural England soils report that most of the land has a Agricultural Land Classification (ALC) of Grade 3, with some Grade 2. The distribution of Grade 3a, Grade 3b and Grade 2 land needs to be determined, Grade 3a is considered BVL. Paragraph 2.2.2 states that an ALC survey will be undertaken and at paragraph 13.6.13 that this will be undertaken with reference to the Natural England guidance.

Natural England reiterates that the following issues should be considered and included as part of the Environmental Statement (ES):

- The quantity and quality of land that will be permanently and temporarily lost to the development. This should include the cable route. The ALC survey should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- Details of how any adverse impacts on soils, in particular BMV agricultural land, can be avoided or minimised through site design/masterplan. Also details of how soils will be sustainably used and managed on site. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts. Mitigation should include reference to the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites.
- Details of any proposed agricultural use of the site during the operational phase, and details of intended restoration following decommissioning.

Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction. Further guidance is also set out in the Natural England Guide to assessing development proposals on agricultural land.

6. Protected Species

We welcome the information that has already been gathered, and a desk study identified records of protected or notable species of flora and fauna within the 2km study area, including Great Crested Newt , and agree with the proposed site surveys listed at Table 9-3. The following is standard advice to reiterate the sources available:

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area. Potential impact pathways where further info/assessment required should be identified.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

The applicant should check to see if a mitigation licence is required using NE guidance on licencing NE wildlife licences. Applicants can also make use of Natural England's (NE) charged service Pre Submission Screening Service for a review of a draft wildlife licence application. NE then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued.

7. Biodiversity Net Gain

Section 9.3.15 shows that a Biodiversity Net Gain (BNG) assessment will be undertaken (using Defra Metric 4.0 or the most up to date metric at the time of the assessment) to identify opportunities for contributing to BNG. These opportunities will be identified and set out within the ES, in line with the requirements of the Environment Act, the NPPF and local planning policy, including the Central Lincolnshire Local Plan. We welcome the commitment to contribute to delivering a minimum 10% net gain in biodiversity at Paragraph 3.2.41.

We note that the Environment Act requires habitats to be secured for at least 30 years. We recommend that a Framework Biodiversity and Landscape Management Plan be produced and prior to the start of construction following grant of the DCO, which will set out the principles for how the land will be managed throughout the operational phase, following the completion of construction. Due to the initial 40-year lifespan of the development, this management plan is likely to fulfil the 30-year management requirement of BNG habitats.

We recommend that all habitat creation on site should be designed to complement the surrounding area, enhancing existing features, improving connectivity across the development area and contributing to the Nature Recovery Network. Please note to the south east is Boothby Lodge Farm, which covers 617 ha of Grade 3 agricultural land and is one of the Environmental Land Management Schemes (ELMs) Landscape Recovery pilots. The project will rewild the site by restoring natural processes and a mosaic of dynamic habitats.

8. Impact on local landscapes

The Development site does not lie within or in close proximity to any nationally designated landscapes, however the EIA should include a full assessment of the potential impacts of the development on local landscape character. Chapter 11 'Landscape and Visual Amenity'

outlines the intention to carry out an LVIA in line with 'Guidelines for Landscape and Visual Impact Assessment, Third Edition', 2013, which Natural England would endorse.

The assessment should include the cumulative effect of the development with other relevant existing or proposed developments in the area.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced Design Principles Design Principles for National Infrastructure - NIC endorsed by Government in the National Infrastructure Strategy.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of the 'Green Infrastructure Strategy for Central Lincolnshire' should be incorporated where appropriate. We are pleased to note that the existing hedgerows, woodland, ditches, ponds and field margins will be retained within the layout of the solar arrays, with the exception of small breaks and/or crossings required for new access tracks, security fencing and connection routes and offsets/buffers from the solar arrays or security, as set out in Table 3-1, will be incorporated within the design, with the exception of where access tracks, security fencing and/or connection routes are required to cross an existing feature. We also note that the buffers/offsets are a minimum and for example may be increased to deliver further mitigation or enhancements and/or respond to root protection areas where required.

9. Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely. We note from our mapping resource that Ancient Woodland Priority Habitat (dealt with below) and Deciduous Woodland (PH) occur within the search area.

Your desk study identified that within the site boundary, priority habitats under Section 41 of the NERC Act 2006 are present or likely to be present (section 9.4.6) include: ancient and/or species rich hedgerows, rivers, standing water/ponds, arable field margins, lowland mixed deciduous woodland, coastal and floodplain grazing marsh, lowland calcareous grassland, lowland meadows, traditional orchards and wood pasture and parkland. These habitats have potential to support a large range of protected and notable species and we note that survey

is required to confirm the presence of further priority habitats.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

10. Ancient Woodland, Ancient and Veteran Trees

We note that the eastern and central part of the study area is typically sparsely wooded, other than a network of small woodland blocks. The western side of the central and southern parts of the study area is typically more wooded, occupied by Hawdin's Wood and Norton Big Wood, both located south west of Witham St Hughs. Both woodlands, totalling approximately 57ha, are identified as Ancient Woodland (AW).

The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 180 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland.

The ancient tree inventory provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.

11. Connecting People with nature

From Paragraphs 11.4.18 – 21 we note that there is an extensive network of routes across the study area, with a notable concentration extending from Thorpe on the Hill. There is also a concentration of paths connecting settlements through the centre of the study area.
The report states that there is relatively sparce public access across the easternmost part of study area and across land east of the River Brent. The Viking Way, a long-distance trail, follows the Southern Lincolnshire Ridge in the south eastern extent of the study area. And a National Cycle Route 64 follows on the northern edge of the study area. There may be opportunities to enhance these provisions.

The ES should consider potential impacts on public rights of way in the vicinity of the development, in line with NPPF paragraph100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of the 'Green Infrastructure Study for Central Lincolnshire' appear to have been considered (Paragraph 11.4.31 and Ref 70) and should be incorporated where appropriate. Natural England welcomes that the landscape assessment will pay particular reference to strategic green corridors, green access links and green infrastructure zones that are within the study area.

We note at Paragraph 3.2.39 that the existing hedgerows, woodland, ditches, ponds and field margins will be retained within the layout of the solar arrays, with the exception of small breaks and/or crossings required for new access tracks, security fencing and connection routes will be retained. Any breaks or crossing will be designed to use existing agricultural gateways/tracks between the fields and the width of any new breaks will be kept to a minimum.

12. Decommissioning and After use

The ES should include details of the decommissioning and after use of the site, with details relating to proposed methods of restoration of land to agricultural use – which should be of an equal grade to the pre-development ALC grading.

Paragraph 12.5.4 states that embedded mitigation measures relevant to the decommissioning phase will be described within an Outline Decommissioning Management Plan (DEMP) to set out the basis for protecting habitats and species during decommissioning, and provide the framework for ensuring soil resources are protected.

There is additional uncertainty regarding decommissioning due to the potential establishment of important habitats during the operational phase. The ES should include a framework to enable the most valuable habitats to be retained where possible.

The loss of created habitats in order to revert to agriculture after 40 years of operation could have a negative impact on biodiversity, habitats and species which have established in the operational period. We acknowledge the difficulty in pre-planning for a scenario 40 years into the future, but consider that the ES should include provision for new surveys and assessment to inform any additional mitigation/compensatory measures to be implemented prior to any reinstatement works occurring. We would also encourage the retention of areas of particular biodiversity value, i.e. widened field boundaries/buffer areas, and/or compensatory habitat being provided off-site.

END OF DOCUMENT

From: M J Burt Chartered FCIPD FCMI

NAVENBY
At the Heart of
the Lincolnshire
Cliffe Villages

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Chairman: Mike Burt
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Claire Deery
EIA Advisor
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

14 July 2023

Dear Ms Deery

NAVENBY PARISH COUNCIL – INITIAL COMMENTS ON FOSSE GREEN ENERGY PROJECT

1. On behalf of the Navenby Parish Council, I request that the following elements be covered in the initial proposal documentation for the Fosse Green Energy Project:

   a. How the choice of site for this project is coherent with Government policy on the use of best and most versatile land.

   b. What SME advisors will be contributing to the report to cover aspects such as loss of wildlife habitat, light nuisance (because extensive lighting is likely to be required for night time security of the site), noise nuisance (during and after any build, e.g. from move and tilt motors to steer the panels).

   c. When a decision will be made on whether the solar farm would be connected to the grid via pylons or underground cabling.

2. At this early stage, the Council also wishes to register the following questions and concerns:

   a. The absence of a Government solar energy planning and usage strategy risks yet another large-scale solar energy scheme being built in a rural area where others exist already, displaced from where the energy is needed, and undermining the UK's strategic food security capacity.

   b. Adding more and more large-scale solar farms to Lincolnshire will change the character of the county from agricultural to industrial, which would be unwelcome.

   c. What other sites were considered for this project, and why Lincolnshire (and this area in particular) was selected.

d. What evaluation has been completed to determine that this and other large-scale solar farms are the most appropriate form of renewable energy for installation in this area – e.g. how many wind turbines would be required to generate the same amount of power.

e. Many experts do not believe the large storage batteries to be safe, and it is understood that should one catch fire it could not be extinguished and would have to be left to burn itself out. Furthermore, given that potentially unfriendly nations hold much of the finite supply of raw materials needed for battery construction, how would the risk of batteries becoming increasingly expensive be mitigated.

f. Given the 40-year life of this project and the rate at which technology advances, how quickly will the initial installation of solar panels become obsolete and need to be replaced or upgraded.

g. Linked to this point, what is the disposal plan for life-expired batteries and solar panels, as we understand that there is limited scope to recycle them.

h. When the project is eventually decommissioned, what safeguards will be in place to ensure the land will be returned to agricultural use.

Yours sincerely

Mike Burt

Chair of Navenby Parish Council

Copies to:

Dr Caroline Johnson MP
Councillor Marianne Overton MBE
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Date: 7 July 2023

Application ref: 23/01072/NPA

Claire Deery
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Sent via email: fossegreenenergy@planninginspectorate.gov.uk

Dear Ms Deery

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Fosse Green Energy Limited (the Applicant) for an Order granting Development Consent for Fosse Green Energy (the Proposed Development)

Scoping Consultation

I refer to the above consultation received by this Authority on 20 June 2023.

The site, as described within the Scoping Report dated June 2023, is located outside of Newark and Sherwood District. The proposed installation of solar photovoltaic (PV) generating panels and on-site Battery Energy Storage System (BESS) and associated infrastructure would be located to the east of the district, covering land from Thorpe on the Hill to the north, to Norton Disney to the south, and would be a minimum of approximately 1.5km away from the district boundary.

Following a review of the EIA Scoping Report, I can confirm that Newark and Sherwood District Council has no comments to make on the information to be provided in an Environmental Statement (ES) relating to the proposed development.

Please note that this matter has not been formally reported to the District Council's Planning Committee. In these circumstances the comments are those of an Officer of the Council under delegated power arrangements.

Yours sincerely,

Ellie Sillah
Planner (Development)

Your Ref : EN010154
Our Ref : 23/0325/NSIP
Contact : Nick Feltham
Email : [redacted]@n-kesteven.gov.uk

North Kesteven DISTRICT COUNCIL

The Planning Inspectorate
Environmental Services Central Operations
Temple Quay House
2 The Square
Bristol BS1 6PN
By email only - FosseGreenEnergy@planninginspectorate.gov.uk

18th July 2023

Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Fosse Green Energy Limited for an Order granting Development Consent for the Fosse Green Solar Park comprising the installation of solar (PV) generating panels and on-site Battery Energy Storage System (electrical generation capacity of 320 to 350 megawatts) along with grid connection and associated infrastructure on land near Thorpe On The Hill, Morton, Witham St Hughs, Haddington Thurlby, Norton Disney and Bassingham, Lincolnshire.

Thank you for your consultation request under regulation 10(6) of the EIA Regulations. North Kesteven District Council, as a consultation body and host authority, wishes to make the following comments in regard to information to be provided with the Environmental Statement Scoping Report. The following comments are made, following the structure of the Environmental Impact Assessment Scoping Report undertaken by AECOM.

Background & Procedural Observations (Conflict with Advice Note Seven)

North Kesteven District Council's (NKDC) involvement to date with the proposed development has been limited to a single initial briefing on Microsoft Teams on 10th May 2023. The applicant plans to commence non-statutory consultation in September 2023 and the statutory consultation is currently envisaged to commence in early 2024.
The Council is concerned that the timescales adopted unilaterally by the applicant – culminating in this Reg. 10 and 11 Scoping Opinion request to the Inspectorate - has fundamentally undermined the degree to which the information contained in the Scoping Report could be relied upon as a robust representation of the potential significant environmental effects of the proposed development.

On that basis the Council's view is that the submission of the Scoping Report is clearly premature and we would encourage the Planning Inspectorate to decline to accept it.
The Scoping Report is dated June 2023, and clearly (as acknowledged by the applicant) has been developed without prior dialogue with interested parties meaning that there has been no opportunity for the content of the Report, and more importantly the composition of the project, to have been informed through the prior engagement of those parties.

There has been no informal/non-statutory consultation, no pre-application discussions or briefings with the Council other than the single meeting referred to above and our position is that this significantly undermines the ability to provide meaningful feedback on the Scoping Report, nor for the matters relating to the scale, layout and composition of the scheme to be fully understood and considered.

Our view is that this submission does not comply with the guidance set out in Advice Note Seven 'Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements'.

Paragraph 5.8 of the advice note recommends that applicants undertake their own non-statutory consultation with the consultation bodies, or others, prior to submission of a Scoping Request to allow for refinement of options ahead of the formal request. It notes that applicants may choose to consult on preferred sites or solutions.

Paragraph 5.9 then cautions that applicants should consider carefully the best time to request a scoping opinion, and that "in order to gain the most benefit, applicants should consider requesting the opinion once there is sufficient certainty about the design of the Proposed Development and the main design elements likely to have a significant environmental effect".

Continuing, it advises that applicants "should avoid submitting requests with multiple and varied design and layout options" however that if this cannot be avoided and options remain under consideration (for example a number of route corridors associated with a proposed linear development) "applicants should be aware that this may affect the ability of the Planning Inspectorate and consultation bodies to provide detailed comments".
Finally, paragraph 5.9 notes that "should a high level of uncertainty remain around key design elements of the Proposed Development this is likely to limit the Planning Inspectorate's ability to agree to scope out aspects/matters to enable the refinement of the ES".

As we set out and highlight below under specific chapter headings, other than very high-level location plans contained in Figures 1.1 and 1.2 of the Scoping Report the Council has not (nor, we assume have any other interested parties) seen any preferred options/solutions, alternatives or design proposals of the type envisaged by advice note 7 and which are deemed essential to ensure a robust Scoping process.

Grid Connection

Turning to the chapters/sections of the report, other than noting the proposed grid connection corridor options (north, central and south) the drawings do not even present an indicative internal layout of the proposed solar array/battery storage development – nor – crucially is a grid connection location illustrated.

Whilst three route options, as above, are noted we understand that there is not yet a grid connection secured by the applicant (or if there is this is not matter of public record) which reinforces our concerns regarding prematurity.

There is reference at paragraph 2.1.3 of electricity export via a 400kV connection to a newly proposed National Grid substation in the Navenby area however no details are provided. Paragraph 3.2.1 sets out the key components of the Proposed Development comprise and only refers to provision of an onsite substation and control buildings; rather than the construction (within the DCO Application) of a new NG substation at Navenby Heath which it is presumed will be delivered by others, rather than comprising 'associated development'. This is confirmed through paragraph 3.2.25 of the scoping report.

Nevertheless, the March 2023 Scoping Report for the Springwell Solar Farm illustrates land in the area of Navenby Heath as capable of accommodating a new NG substation and it is assumed that both the Fosse Green and Springwell schemes would connect into this. The Council awaits confirmation from the National Grid following recent correspondence, although paragraph 3.2.28 suggests that this might be imminent. The Planning Inspectorate should therefore satisfy themselves that the Fosse Green Solar scoping report is sufficiently detailed (in relation to grid connection issues) to enable a meaningful assessment of potential significant environmental effects given that this remains a significant 'unknown' at the present time and has particular implications for the consideration of 'alternatives'.

Section 1.3 Legislative Context

1.3.10 - depending on the preferred location of the grid connection corridor the Coleby Neighbourhood Plan might be a relevant document. Paragraph 3.2.11 notes that at the lower edge, modules would be approximately 0.8m from the ground and approximately up to 3.5m at the higher edge but with final elevations of the modules will be influenced by various design factors such as local topography and flood risk. Comments from the EA should be sought however the applicant is advised that the proposals at Heckington Fen were required to undertaken flood modelling including a breach scenario with resultant zoned areas of differing panel heights.

Paragraph 3.2.40 and table 3.1 contain proposed separation distances to ecological habitats etc however there is nothing to confirm how these were derived. Also, depending on the point at which the DCO is applied for, and during consideration of the application, either s104 or s105 of the Act will be engaged. Even if still in draft, the March 2023 consultation versions of EN-1 and EN-3 will be a material consideration.

Alternatives considered

Paragraphs 4.1.3 and 4.2.1 state that the alternatives analysis is likely to focus on different Proposed Development layouts, sizing, technologies and design parameters, and site location and that the reasons for site selection will be detailed in the ES.
There is no specific reference to alternative sites, nor the degree to which the various environmental or other constraints will be factored into the search parameters in order to identify and potentially rule out (with evidence) what those alternatives are.

It is accepted that the grid connection option is a key locational factor for solar farms however as above there is (currently) no grid connection available, and no information on the location, timings and responsibilities for delivering a new NG substation near Navenby. Whilst this might evolve as the scheme develops, at present therefore the 'alternatives' search area is potentially very extensive (District/County/Regional) reflective of there presumably being NG substation connections elsewhere.

We would therefore suggest that the scoping opinion cannot/should not specify anything other than an extensive alternatives/site selection zone at this stage. This also has a crossover with the application of the flood risk sequential test referred to below, and (depending on detailed augering and ALC analysis) BMV land considerations.

Cumulative Effects with Other Developments

The 5km search area is not necessarily appropriate and the use of a suggested 'blanket' ZOI is not supported by the Council in each case. For the avoidance of doubt the Council suggests that cumulative effects associated with BMV agricultural land impacts (i.e. in relation to 'soils and agricultural land') should as a minimum include all of the NSIP solar projects in Lincolnshire at Heckington Fen, Springwell Solar Farm, Beacon Fen solar park[1], Tillbridge, Temple Oaks, Cottam, West Burton, Gate Burton and Mallard Pass along with BMV agricultural land impacts associated with the Lincolnshire Reservoir. We reserve the right to highlight other projects as and when these become known and can advise how these might be treated with reference to Table 2 of Advice Note Seventeen 'Cumulative effects assessment relevant to nationally significant infrastructure projects'.

The other cumulative developments noted in 6.6.12 are accurate and accepted (Witham St Hughs Phase 3 is referenced as a cumulative project however the planning reference is wrong; it is 15/1347/OUT) however as above 6.6.13 also acknowledges the close proximity of the proposed Springwell solar farm to the grid connection corridor options. Other known projects that should be considered in terms of cumulative considerations include the North Hykeham Relief Road, the A46 Newark Bypass and St Modwen Park Lincoln – hybrid outline/full application referenced 20/1523/FUL and which is under construction.

Climate Change

Based on the information supplied, we have no significant issues with the general approach proposed as the applicant has indicated the expected key elements when considering climate impacts, such as proposed methodology, whole life emissions calculations to covering pre-construction, construction phase, life time (including operational and maintenance) and decommissioning.

However, it would be beneficial if the applicant can clearly evidence the estimated lifetime emissions compared to estimated CO_2 saved from renewable energy generation (and therefore the carbon payback period). During these calculations, we will expect the applicant to use the latest conversion factors (2022), rather than the 2021 conversion factors as referenced in the scoping report. We would also request consideration of current electricity measure mix when calculating emissions data and expecting savings, rather than comparison with gas generated electricity.

[1] Beacon Fen 'South' has since been removed from this project

In addition to the quoted national legislation, NPPF, national guidance and local planning policy, key NKDC documents alluding to climate change – namely our Climate Emergency Strategy and Climate Emergency Action Plan – should also be referred to. The Council has a separate target timeline to government targets and this should be considered during the assessment.

We welcome the consideration of carbon sequestration within the scoping report however would like further data on the management of this and consideration of multi-use approaches, whether this includes some livestock or planting of species to increase the organic matter over the operational lifetime of development.

Whilst not directly a matter for EIA Scoping, we would also request that the applicant give consideration to an agreement that a % of renewable energy could be directed to and utilised locally. In addition, a commitment to publishing annual kWh generation would lend itself to understanding and calculating our carbon footprint as a District, since NSIP developments are not included in government LA GHG emissions calculations.

Finally, table 7.1, 'primary emission sources' sets out that it will consider operational GHG emissions from material use and waste generation resulting from ongoing site maintenance. This should be expanded to include GHG associated with the manufacture and transport of replacement parts, components, plant and equipment during the course of the 40-year operation of development.

Cultural Heritage

We disagree with the suggested study area at paragraph 8.2.1 namely for non-designated assets extending to a distance of 1km from the Site boundary, and 3km in the case of designated heritage assets. We would suggest that the minimum study area of 5km is adopted for both designated and non-designated heritage assets and note that PINS have adopted a 5km study area for other solar NSIP projects in the District.

With reference to paragraph 8.2.2 it is unclear what is meant a 'flexible approach will be taken to the identification of high-value assets' on which there may be an impact upon setting, up to 5km from the site boundary. As above, we consider that a minimum of 5km should be adopted for all heritage assets however there might be designated heritage assets outside of the study boundary which require individual consideration/agreement; for example potentially long distant views of Lincoln Cathedral from the area within the Witham/Brant valley southeast of Bassingham.

The section under 'Local Planning Policy' does not reference the adopted Conservation Area appraisals for Harmston, Coleby, Navenby and Bassingham (the first three with reference to the cable connection corridor).

Table 8-1 and paragraph 8.6.2 references criteria for assessing the value of heritage assets. It differentiates between 'conservation areas' and 'conservation areas of demonstratable high value'. However, there is no such differentiation in the Planning (Listed Buildings and Conservation Areas) Act 1990 nor in the appraisals and management plans adopted by the Council and there is no reference in the scoping report as to how this will be applied. As such we favour that all conservation areas are placed in the 'high' asset value category.

In addition the same table contains a number of subjective asset description references, e.g. *'non-designated heritage assets (archaeological sites, historic buildings, monuments, parks, gardens or landscapes) that can be shown to have demonstrable national or international importance'* and '*well preserved historic landscape character areas, exhibiting considerable coherence, time-depth or other critical factor(s)'.* It is unclear where these are derived from and how assessments will be made in due course.

With reference to paragraphs 8.6.3 and 8.6.4 it is not particularly clear how 'value' will be applied to the heritage assets. The Scoping Report refers to "embedded mitigation", which is a subjective value, with potentially limited impact assessment, weighed against mitigation that has been designed *prior to* understanding the heritage value of the asset concerned. The Council is concerned that this is not a balanced approach.

With reference to 8.6.9, the adopted Conservation Area Appraisals for Coleby, Harmston, Navenby and Bassingham will be applicable depending in part on the preferred option for the cable connection route.

With reference to archaeological matters, we would refer you to the comments of the Council's consultant archaeologist at the Heritage Trust of Lincolnshire, attached as **Appendix 1**. As above, the Scoping Report states that the study areas have been defined as 1km from the site boundary for non-designated heritage assets and 3km from the site boundary for designated assets. The search areas for the desk-based assessment should be as a minimum 2km from the site boundary (including the cable route options) for non-designated heritage assets (although as above we recommend 5km) and 5km from the site boundary for designated heritage assets.

The Settings Assessment/Heritage Impact Assessment needs to demonstrate an understanding of the significance and context of each of the assets in order to assess the impact of the development upon them and propose any mitigation.

The Report states (8.6.10) that consultation will be undertaken with relevant heritage bodies including Historic England; the Historic Environment Officers for Lincolnshire; and the Conservation Officer for North Kesteven District Council. Consultation on cultural heritage, relating to matters on archaeology, should also include the archaeological advisor to North Kesteven District planning authority.

The baseline described in the Report comprises a summary overview of the designated and non-designated heritage assets recorded in the current search areas. No further studies are reported or summarised in the Scoping Report. The desk-based assessment should take into account a search of the recommended study areas (see above). The full suite of desk-based information needs to be assessed to inform the baseline. Desk based sources should include LiDAR and aerial photo coverage and assessment. The LCC guidance document 'entitled 'Guidance for large schemes including NSIPs and EIAs, General Scoping Opinion for the Historic Environment' also sets out the data sources that should be included to inform the baseline conditions. The scope (content) of the individual desk-based assessments should be established in discussion with the archaeological consultees.

The Scoping Report (8.6.13) states that the desk-based research will be supported by a programme of non-intrusive and intrusive archaeological evaluation. The EIA will require desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact.

It is stated that geophysical survey will be undertaken within the Solar and Energy Storage Park and along the Grid Connection Corridor, once a single route option has been selected. Geophysical surveys are required across all areas of potential impact. The results of the geophysical survey will inform the programme of trial trenching required.

The report states that '*trial trenching evaluation and detailed setting assessments will be undertaken as part of the assessment process'.* The results of the full desk-based assessment, including the aerial photographic and Lidar assessments, together with the results of the geophysical survey will inform the programme of trial trench evaluation.

Trial trenching is required to establish the baseline conditions and to understand the nature and extent of the impacts on the archaeological remains. In order to determine the presence, absence, significance, the depth and extent of any archaeological remains which could be impacted by the development, trial trenching should target areas where archaeological remains have been identified in the foregoing, non-intrusive surveys as well as areas where the surveys have not detected archaeological remains.

The programmes of archaeological evaluation should be set out in a written scheme(s) of investigation (WSIs)s to be agreed with the archaeological consultees prior to commencement of the field investigation(s).

The report states that the ES will detail *'the results of the environmental assessment, likely significant effects arising from the Proposed Development, and the proposed mitigation measures* … and … i*dentify opportunities for social and economic benefits and environmental enhancement'.*

The ES will require desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of the proposed impact. Without the relevant surveys and site evaluation it will not be possible to assess the likely significant effects of the proposed development and design an appropriate mitigation strategy.

As above the results of the trial trenching, together with the foregoing assessments and surveys, should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation to be presented in the ES.

The ES should consider opportunities for enhancing the environment and the positive and beneficial effects of the programme of archaeological surveys and investigations to be undertaken during ES process and the added value that a large development can make to archaeology and cultural heritage. The programme of archaeological works should include proposals for community outreach, public engagement and dissemination of the results.

With reference to decommissioning the nature of the archaeological resource has yet to be determined and assessed and, for example where identified assets may have been avoided / protected in situ during construction / operation they may be under threat from disturbance or destruction during decommissioning. Therefore, cultural heritage should be a consideration as part of any outline decommissioning plans.

Ecology and Biodiversity

The Council is unable to provide detailed comments regarding the proposed scope of the ecology and biodiversity chapter owing to professional conflicts of interest between the appellants agent, AECOM, and the Council's ecological contract with the same consultant. The Council reserves the right to provide detailed comments in due course, including in relation to the Preliminary Environmental Information Report (PEIR) in the event that we appoint independent ecological advice from elsewhere.

However, the search area applied in 9.2.3 is common with those adopted on other NSIP scale solar farms in NKDC. Paragraph 9.3.2 refers to the status of the secondary legislation associated with the Environment Act and as such comments that the Proposed Development will only 'seek to' include a minimum target of 10% BNG compared against the pre-development biodiversity value. The Council would highlight the requirements of CLLP Policy S61 'Biodiversity Opportunity and Delivering Measurable Net Gains' which requires that all qualifying development proposals *must* deliver at least a 10% measurable biodiversity net gain attributable to the development.

The net gain for biodiversity should be calculated using Natural England's Biodiversity Metric'. NSIP schemes, by virtue of their scale and the nature of development, are very well placed to be able to deliver *at least* 10% BNG, and therefore we are disappointed that the applicant's commitment is only to 'seek to' deliver 10% BNG which is therefore at odds with Local Plan policy.

With reference to 9.3.12, relevant local guidance comprises the Central Lincolnshire Biodiversity Opportunity and GI Mapping, Central Lincolnshire Green Infrastructure Strategy and Local Nature Recovery Strategy (or any subsequent replacements) which should all be referred to in the formulation of ecological enhancement/gain.

Paragraph 9.5.7 and Table 3-1 refer to undeveloped buffers being included to protect hedgerows, veteran/ancient trees, ponds and ancient woodland during construction and operation. However, as there are no indicative/draft layout plans it is unclear how these have been derived and whether they are appropriate.

Finally, whilst paragraph 11.1.4 confirms that the LVIA will be undertaken with reference to other environmental topics and reports, 'including the Arboricultural and Glint and Glare Assessment' there is no other reference to the Arboricultural Assessment elsewhere in the Scoping Report. For the avoidance of doubt the DCO application should be accompanied by a full tree survey and constraints plan undertaken to BS:5837 'Trees in relation to design, demolition and construction – Recommendations' standards. Reference should also be made to the Council's adopted Tree Strategy (2020) www.n-kesteven.gov.uk/sites/default/files/2023-02/tree_strategy.pdf.

Water Environment

With reference to paragraph 10.3.9 and 10.4.2 the (AECOM) NKDC Strategic Flood Risk Assessment (SFRA) (www.n-kesteven.gov.uk/sites/default/files/2023-01/Strategic%20Flood%20Risk%20Assessment%20Report.pdf) should also be referred to in the consideration of local water resources/flood risk guidance.

With reference to the grid connection corridor options at 10.5.5, the applicant is reminded that an Anglian Water pipeline is currently under construction in the area through Harmston/Coleby/Navenby Heath. Underground cable connection options need to factor in the location and depth of the pipeline and early discussions with Anglian Water are recommended.

With reference to paragraph 10.6.13 and 10.6.16, the Scoping Report notes that above ground infrastructure and solar PV panels in the Solar and Energy Storage Park will be located away from areas at risk of fluvial flooding where possible and that development of 'essential infrastructure' in flood zone 1 is acceptable.

However, in the absence of any indicative layout plans and with reference to the site location plan, parts of the site are within both flood zones 2 and 3 (confirmed by Figure 10-3). Whilst there is *in principle* a compatibility between essential infrastructure and development in those flood zones, this still presumes that the flood risk sequential test has first been applied and passed. Chapter 10 does not acknowledge the need to apply the flood risk sequential test if any development is proposed in flood zones 2 and 3.

The sequential test search area should align with the search area for 'alternatives' (see above). At present the 'alternatives' search area is potentially very extensive (District/County/Regional) reflective of there presumably being NG substation connections elsewhere. The grid connection strategy has yet to be confirmed for Fosse Green. We would therefore suggest that the scoping opinion cannot/should not specify anything other than an extensive flood risk sequential test alternatives/site selection zone at this stage. Consistent with advice offered initially for other NSIP solar schemes in North Kesteven District, as a minimum this should be set at county level reflective of grid substation connection possibilities elsewhere.

Landscape and Visual Amenity

Paragraph 11.2.3 suggests that the preliminary study area relating to the Solar and Energy Storage Park will extend up to 2km from its boundary, with 11.2.4 noting that although the Proposed Development may be visible beyond 2km, it is unlikely to result in any notable change to people's views given the intervening distance, vegetation, built form and overall visibility.

Whilst 11.2.6 notes that the extent of the LVIA study area will be reviewed throughout the iterative design process, at this stage we disagree that a 2km boundary should be adopted. The recent Scoping Report for the Springwell NSIP solar farms in NKDC set an initial study area of 3km from the site boundary for all features of the Proposed Development, except the National Grid and Project Substation and National Grid connecting tower for which the study area would be extended to 5 km.

In this regard there is a complete absence of information on site layout including zoned/parcelled areas for potential solar generation areas, the BESS, substation and potentially a new NG substation.

The local policy/guidance discussion at paragraph 11.3.10 onwards does not refer to the adopted 2007 NKDC Landscape Character Assessment, which should be referred to in the preparation of the LVIA. None of the proceeding sections addressing landform, settlement and land use refer to the sub-areas within the NKDC LCA and therefore it is assumed that the author is unaware of its existence.

The 'Designations' sub-heading then refers to the now-replaced 2017 CLLP whereas the preceding 11.3.10 refers to policies in the adopted 2023 Plan. Paragraph 11.4.24 further errs in its reference to the '2016 Local Plan' and then points to the absence of a published description of the Lincoln Cliff AGLV and its key features as justifying why the 'LVIA does not propose to assess the AGLV as a landscape receptor'. We fundamentally disagree with this approach.

Whilst the site location plan suggests that the only operational development to take place within the AGLV is in relation to cable connections, it appears likely that views from the elevated AGLV across the lowland Witham and Brant Vales LCA will allow visibility of the solar farm site to the west. Amongst other things Policy S62: 'Area of Outstanding Natural Beauty and Areas of Great Landscape Value' of the CLLP – the 2023 version rather than the erroneously quoted 2016 Local Plan and now replaced 2017 version - requires that

'*development proposals within, or within the setting of, AGLV shall:*

e) conserve and enhance the qualities, character and distinctiveness of locally important landscapes; and
f) protect, and where possible enhance, specific landscape, wildlife and historic features which contribute to local character and landscape quality; and
g) maintain landscape quality and minimise adverse visual impacts through high quality building and landscape design'.

Impacts on setting are therefore material and must be addressed in the LVIA.
Paragraph 11.4.26 refers to Conservation Areas in the District. There are adopted appraisals for Navenby, Bassingham, Waddington, Harmston and Coleby and these should be referenced to establish where (if applicable) there are relationships between the surrounding landscape and the character and appearance of those Areas.

Paragraph 11.4.26 also refers to the Whisby Nature Park Green Wedge as not being a landscape designation. Whilst this is correct, Green Wedges are designated inter alia to preserve local and historic character and to conserve and enhance local wildlife and protection of links between wildlife sites to support wildlife corridors. Reference should therefore be made to the Central Lincolnshire Green Wedge and Settlement Breaks Review for background information. Whilst the Witham Valley Green Wedge is outside the red line site area it is within the study area, and therefore should also be considered alongside all other Green Wedges in the study area.

In addition to the 2011 Green Infrastructure Study for Central Lincolnshire, the 2019 Greater Lincolnshire Nature Partnership (GLNP) baseline GI Map for Central Lincolnshire should also be reviewed, and landscape proposals developed with reference to the strategic green corridors, green access links and green infrastructure zones that are within the study area; alongside the Biodiversity Opportunity and GI Mapping and Local Nature Recovery Strategy referred to above.

With reference to Table 11-1 'Landscape and visual receptors to be scoped in' the Council will wish to agree these once the solar park layouts and cable connection corridor/nature of cable connection is developed further. 'Visual receptors – people engaged in recreational activity' should include users of higher value routes including the Viking Way long distance footpath running through the Lincoln Cliff AGLV.

With reference to 11.8.10, we agree that at the present time a Residential Visual Amenity Assessment should be undertaken in line with the Technical Guidance Note 2/19: 'Residential Visual Amenity Assessment'; however depending on the final layout and proximity of solar panels, plant and equipment to settlements and individual properties this might be able to be reduced in overall geographical scope.

The Council is likely to procure detailed feedback through appointing an LVIA consultant and we would wish to agree viewpoint and photomontage locations in due course outside of the scoping process and in advance of the PEIR. Final viewpoint selection should consider views of taller and more conspicuous elements, such as battery storage or sub-stations once the layout is more developed, as well as considering potential key, or sensitive, viewpoints.

The relative prematurity of the submission and the large number of variables and options in terms of site layout mean that no illustrative viewpoints have been provided at scoping stage. Photomontages are likely to be required to illustrate the proposals at different phases namely the existing situation (baseline), Operational (year 1) and Residual with planting established (10 to 15 years), and the methodology. The methodology should also clearly lay out the process of assessing temporary and permanent elements of the scheme, and the LVIA should clearly identify those elements that would not be decommissioned at the end of the life of the development (for example; if a new permanent National Grid substation forms part of the DCO application), and assessed accordingly.

Finally, cumulative LVIA considerations might need to include those schemes set out in paragraph 6.6.12 with particular emphasis on the Springwell solar park NSIP; (Springwell West in particular) – alongside the proposed cable connection options for Fosse Green. Any proposals coming forward pursuant to the battery storage scheme identified through 23/0584/EIASCR are also likely to require scoping in to cumulative LVIA considerations.

Noise and Vibration

With reference to paragraph 12.2.4 the Council would be pleased to agree background noise monitoring locations and therefore the schedule set out in Table 12-1: Sensitive Receptor Locations should not necessarily be considered 'fixed'. In this regard, development is underway at Phase 3 of the Witham St Hughs residential area and there may be a more appropriate noise monitoring location representative of that future development somewhere in the study area between locations R20, R23 and R44.

Noise monitoring locations towards the northern part of the study area might need to account for the future cumulative development of the North Hykeham Relief Road (NHRR); particularly around R27, R29, R41 and R45. Baseline noise sources referred to at 12.4.2 may also include operational noise from RAF Waddington as well as road traffic noise.

With reference to 12.6.8, operational noise assessment will need to account for potential permanent (as opposed to temporary/reversible) effects if the DCO incorporates provision of a new National Grid substation.

The Council's Environmental Health team are otherwise satisfied with the proposed methodologies for monitoring construction and operational noise including the recommendation that construction/decommissioning noise is dealt with via a Construction Environmental Management Plan (CEMP) – the scope and content of which must be agreed in discussion with the Council.

Finally, 12.2.3 states that the study area for construction noise effects along the grid connection will include receptors within 300m, and that these receptors will be identified once one of the Grid Corridor Option has been selected and refined post-scoping. Given the proximity of the grid connection options to Springwell (West) solar park including, at this stage, the unknown regarding the grid connection location for both Springwell and Fosse Green, cumulative construction noise impacts (Fosse Green) may need to be considered alongside construction and operational noise stemming from Springwell West/associated grid infrastructure.

Socio Economic and Land Use

Whilst there are some cross-overs in the Scoping Report, the Council would recommend that Socio-Economic impacts and Land Use impacts are spilt into different freestanding chapters consistent with the other three NSIP scaled solar farms in North Kesteven District.
Turning to land use first, alongside the below comments we would also refer you to the comments of the Council's Land and Property consultant, Landscope, attached as **Appendix 2**. Paragraph 13.6.3 states that an ALC soil survey will be undertaken for the land parcels within the Site boundary, 'as deemed necessary'.

It is disappointing that the Scoping Report does not even reference the 'East Midlands Agricultural Land Classification Map (ALC005)' and therefore does not provide any tabulated data on potential proportions of BMV across the study area. Reference to that mapping suggests that most of the study area is undefined Grade 3, with some discreet areas of Grade 2 land around Witham St Hughs, Thorpe on the Hill and Haddington.

ALC soil survey should be carried out across the extent of the proposed DCO boundary rather than being 'discretionary' as is inferred. Notwithstanding, paragraph 13.6.13 then notes that an ALC survey of the Solar and Energy Storage Park will be undertaken with reference to the Natural England guidance. The February 2021 Natural England 'Guide to assessing development proposals on agricultural land' document (TIN049) alongside the MAFF 1988 guidance should be adopted which requires augering every hectare on a regular grid on agricultural land in the proposed development area.

The principle underlying geology at the site is a Lower Lias Clay, Shale and Rare Limestone. Publicly available soils mapping and local knowledge, including the Soil Survey of England and Wales have mapped the soils in 1983, at a reconnaissance scale of 1:250,000 and shows the primary soil associations to include Soil Type 711f Wickham, described as slowly permeable seasonally waterlogged fine loamy over clayey, fine silty over clayey and clayey soils.

Small areas of slowly permeable calcareous soils are found on steeper slopes. 711f Wickham is described in detail in Appendix 4 with information taken from the Cranfield University Landis, website, 'The Soils Guide'.

Previous ALC surveys locally on these soils and similar have indicated a mixture of Grades 2, 3a and 3b land. It is likely that the shallower and heavier soils will be 3b, whilst deeper soils will be 3a or Grade 2. The ALC should identify where BMV land is and the scheme should seek to protect and minimise damage to higher grade land wherever possible in line with national planning policy. There is undoubtedly a lot of BMV land in this vicinity and only a full ALC will identify where it is and what the Grade and quality is. Laboratory analysis of representative samples should be used to determine textures.

With reference to the proposed cable route options, it seems likely that 50-100% of the cable route will be BMV, where any loss is likely to be significant. However, irrespective of the land quality issues, there will be matters of concern to farmers and landowners including:

• Land drainage
• Weed burden
• Biosecurity for plant diseases
• Timeliness of soil stripping, storage and handling
• Compaction of subsoil
• Re-instatement to previous quality/standard.

These matters will need to be addressed if the scheme is to proceed.
Paragraph 13.6.14 notes that it is not currently confirmed how the land will be managed under and around the solar PV modules but that there is potential for continued agricultural use of the land through grazing and that the proposals relating to this will be presented in the ES to inform the assessment. The ES chapter should be structured to reference:

➢ Acknowledging the proposed change from primarily arable farming to solar

➢ Whether any pastoral farming (for example sheep grazing) is proposed within the site, and if so where and how this is to be secured. This should include;

➢ identifying whether contracts are in place for pastoral farming;

➢ whether those contracts span the operational duration of the scheme (60 years minimum);

➢ whether and how the applicant considers that such contractual obligations, and more broadly, a change from one type of agricultural activity (pre-development) to another (post-development) could be legally secured, monitored and enforced through the DCO regime – for example through the use of Requirements/legal agreement

➢ For all other areas within the site whether or how those areas will remain in agricultural activity with the presence of solar panels and BNG habitat/landscaping implementation.

In order to satisfy Schedule 4 (7) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 the applicant must be able to identify and arguably secure any measures relied upon to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects; not least where this is partly relied upon by any proposed change in agricultural activity across the site.

As a general observation, Landscope comment that this part of Lincolnshire/North Kesteven District is a mainly arable farming area with only limited sheep grazing operations. Whilst it is possible to graze the areas under and between the panels, it is unlikely to be very cost effective for a grazier. The difficulties of rounding up sheep and handling them, together with finding sick or wounded animals makes the grazier's workload harder and more complex.

As such the economics of moving sheep to and from the site will be marginal. Grass does not tend to grow well under the panels themselves and there are often areas that are dry and barren or that only host weed species, due to heavy shading. Grazing management is also not easily compatible with standard biodiversity management practices at Solar Photovoltaic sites due to fundamental population biology principles.

As the site is presumed to be in arable production at present, currently it may have a relatively low level of biodiversity. The grazing management plan may, therefore, lead to a modest increase in species richness at the site from current base levels, but it will not deliver the level of biodiversity that the site could potentially achieve if biodiversity gains were prioritised over agricultural production.

By grazing land for agricultural livestock production, the level of disturbance is high. This prevents plant species with a slow establishment rate (which often are those which are ultimately strong competitors) from growing – and thus the invertebrates that feed on these species are also excluded from the area. Areas which promote high species diversity often use low intensity grazing as a means to promoting biodiversity.

Grazing represents a form of disturbance to the area, thus preventing any one species becoming too dominant. It also helps manage the sward to provide an optimum habitat for invertebrates. Stock densities are generally monitored and adjusted to prevent either under and overgrazing and to ensure the sward contains a mix of long and short vegetation with some plants in flower. There is therefore some conflict between maintaining the land in agricultural production and improving biodiversity. Whilst not incompatible, site based issues, such as soil type(s) and local agricultural practices may therefore pose conflicts which the relevant ES chapter/s should assess.

The ES should consider the potentially negative effects associated with the inevitable removal of land from agricultural production and that there may be businesses/tenants/occupiers currently undertaking agricultural operations across the site boundary who may cease to do so for the duration of the operational phase of the development.

With reference to cumulative BMV/ALC considerations, the ES should reference the other Lincolnshire solar energy NSIP schemes referred to elsewhere in this response. The situation is a moving picture as new proposals come forward from time to time.

For a project of this scale where the project will tie up the land for up to 40 years, there will invariably be some impact both individually and cumulatively; if the BMV proportions are greater and of higher grades following the completion of sampling (in line with TIN049) then the loss of such a large area of land would on an individual basis normally be considered as significant at District level, even though the use is 'temporary', and cumulatively of potentially greater significance at a County level. Any temporary or permanent loss of land due either through construction, or through the creation of BNG areas, may affect this assessment further.

We also advise that the ES contains a farm holdings impact statement with reference to the farm holdings affected by the proposal and which addresses viability, infrastructure and long term consequences on the individual holding. The Soils Management Plan (SMP) should include reference to soil structural issues and waterlogging that has occurred on solar farms elsewhere in the UK.

Turning to socio economic effects the Scoping Report is very brief and light on detail, and rather high level, which is disappointing. The Council comments as follows. Firstly there is no indication of what the proposed level of investment in the site is; i.e. the value to the national and local economy of the financial investment into the construction and operation of the proposed solar farm.

In terms of the construction phase there is nothing in the chapter that indicates how many people will be employed during the construction phase. Evidence from other schemes is that this is where most employment, albeit, temporary will be created. However, no numbers are mentioned, or how phasing of the development may impact upon construction opportunities.

Linked to this, there is no indication of whether this will create local employment opportunities, whether for locally based sub-contractors, or for direct construction employment. No reference to apprenticeship opportunities, or indeed how local construction firms might be able to benefit from this development. This is a significant omission.

Linked to this, because there is no indication of the level of construction workforce that will be required to construct the solar farm, there is no information of where the construction workforce will come from (i.e. local contractors or specialist teams or a combination), for how long they will be on site, depending upon their construction role, and where they will be housed, assuming they are brought in as external contracts.

The ES should therefore identify how local businesses may benefit from maintenance contracts related to the project, along with opportunities for specialist contractors to be hosted by local accommodation providers during the construction phase. The ES should also address the potential for employment opportunities via apprenticeships. Economic benefits to the town of North Hykeham in particular should also be quantified if possible, associated with the possible hosting of construction workforce during the construction phase.

Equally, once the site is operational, employment and contractor opportunities are not really covered in any detail; for example what types of maintenance contracts may be available to local businesses, how the applicant will engage with the local business community and what the impact on existing agricultural employment is as a consequence of a significant amount of arable land being taken out of production? The ES should therefore specify the type of local opportunities the construction process will offer, both in terms of direct job opportunities during the construction phase, and longer term in terms of permanent full time operatives to monitor and maintain the solar farm.

Impacts on the local tourism and visitor economy offer are not quantified or noted. The proposals are in come proximity to a number of settlements, in particular Thorpe on the Hill, Haddington, Witham St Hughs and Bassingham. As well as North Hykeham, we would expect that there should be some analysis of what the potential economic impact on these villages might be.

In terms of local tourism, the development may provide opportunity to enhance both resident and visitor engagement. Given the nature and scale of the proposal, is there not an opportunity to have a visitor centre or at the very least some form of publicly accessible interpretation facilities that extols the benefits of renewable energy?

Potential socio-economic impacts should be based on the interactions between the expected project activities and the people and communities, including to consider whether any tourism accommodation providers in the area that will be adversely affected by the solar farm. As above the ES should also consider whether any livelihoods will be lost as a consequence of the development and for instance whether agricultural workers may be offered re-training and re-skilling to work on the solar farm. The ES should estimate the number of farms that will be affected by these proposals and what the potential loss of agricultural employment will be.

There is also limited reference in the proposed scope to any socio-economic benefit enduring from continued agricultural use of part or all of the site. Sheep grazing is briefly noted however there may also be alternative forms of cropping among panelled areas. The applicant should therefore quantify whether and how there are socio-economic benefits stemming from a change from predominantly arable agricultural use of the site predevelopment to a solar and possibly pastoral use post-development.

We suggest that the applicant should also identify a mechanism by which any changes in agricultural activity (and ergo any associated socio-economic effect) can be secured through the DCO process.

In summary therefore, with reference to direct, indirect, temporary and permanent employment jobs created through construction, operation, maintenance and decommissioning, this information should be presented along with identification of;

- ➢ opportunities for using local businesses on various aspects of the construction phase;
- ➢ how the applicant would go about supporting local business procurement;
- ➢ financial estimates of economic benefits of the construction phase to the local economy including hotel spend etc;
- ➢ opportunities to encourage apprenticeships; and

➢ financial estimates and local opportunities associated with ongoing maintenance over the 40-year operational period.

In terms of potential economic benefits, the Council notes that an established way of calculating the extra value generated by local spend on contractors and services would be by using LM3 multipliers which the applicant might wish to consider depending on the certainty of construction contracts etc at this stage. The multiplier can be found at https://www.lm3online.com/.

Traffic and Transport

Paragraph 14.3.6 notes that it is likely that components would be transported from one of the local (unnamed) ports and that as part of the PEIR Stage, an initial access feasibility assessment will be undertaken to determine the potential access route(s) for delivering these components to the Solar and Energy Storage Park via the Strategic Road Network (SRN) and local roads. If Felixstowe is likely to be used then the ES should include cumulative impacts of component delivery along with the Heckington, Springwell and Beacon Fen solar NSIPs which are also likely to use the A17 and A15.

Paragraphs 14.3.8 and 14.3.9 refer to the three potential corridors being explored for the grid connection, namely northern, central and southern. The Scoping Report confirms connection into a new National Grid substation in the 'Navenby area' but which it outside the scope of the proposed DCO. Cumulative transport considerations should therefore include (primarily construction) impacts of the preferred cable connection route along with the new National Grid substation and Springwell solar farm; specifically the 'Springwell West' zone.

Cumulative construction effects should include any unimplemented areas of Phase 3 of the Witham St Hughs development along with the North Hykeham Relief Road. The applicant should also agree the scope with National Highways, to possibly include the A46 Newark Bypass improvement scheme.

Paragraph 14.3.14 onwards lists PRoW located within the Site boundary of the Solar and Energy Storage Park. Of these, the Viking Way long distance trail is likely to have heightened sensitivity and would be crossed by all three cable connection options. It should be acknowledged as such as distinct from other PRoWs in the ES.

Other Environmental Topics

The Scoping Report confirms a number of areas that will remain 'scoped in' but with a lighter touch assessment and where the EIA methodology set out in Chapter 6: Environmental Impact Assessment Methodology will not apply. However, it is assumed that if PINS determine that specific topic areas in section 15 should be 'scoped in' then presumably they must also be subject to the same methodology requirements.

We have no objection to Air Quality being scoped out however note that some NSIP solar energy schemes in the District have scoped this chapter in to the ES (e.g. Springwell Solar), and PINS should therefore ensure that there is consistency of approach. Nevertheless there may still be cumulative effects in relation to air quality/dust which need to be considered.

Paragraph 15.2.10 states that the anticipated number of vehicles that will be required during the construction and decommissioning phases of the Proposed Development have been considered in the context of published guidance, and 15.2.11 then states that “as such, the predicted construction flows are well below the criteria and are not expected to adversely affect air quality. It is therefore proposed that construction traffic is scoped out”. However, the ‘Sources of Baseline Information, Scenarios and Consultation’ section of Chapter 14 does not quantify potential flows therefore this conclusion does not appear founded at present.

Paragraph 15.5.9 suggests that it is considered highly likely that as the design of the Proposed Development evolves in preparation of the DCO application, it will become clear that there is no real risk or serious possibility of major accidents or disasters, such that this matter will be scoped out. Whilst PINS agreed to scope out a standalone ES Chapter for major accidents and disasters in consideration of the Heckington Fen Solar Farm, this was on the basis that that the nature, scale, and location of that development was not considered to be vulnerable to or give rise to significant impacts in relation to the risk of accidents and major disasters.

In particular, there was some certainty about the likely location of substations and the BESS. However, there are no layout proposals for Fosse Green and the location of these features is therefore not known at this time. PINS should therefore carefully consider whether there is sufficient detail at this stage to scope this chapter out of the ES. We also note that Lincolnshire Fire and Rescue have required preparation of a smoke plume assessment in relation to the BESS on other NSIP solar schemes in the District. This might be equally applicable to Fosse Green.

We agree that effects to human health as a result of the proposed development can be scoped out as long as reference is made where applicable through the findings of other assessments undertaken as part of the EIA process. We agree that ‘waste’ can be scoped out as long as there is reference to within reports/assessments to the likely volume and disposal methods of replacement panels and components throughout the operational lifetime.

Finally paragraph 15.4.3 notes that the tier 1 Preliminary Risk Assessment will assess a number of matters including details of any available site investigation, risk assessment, remediation, and validation reports for land within the Site. For the area around Witham St Hughs/CEMEX quarries we recommend that this include a Unexploded Ordnance (UXO) assessment mindful of the proximity of the former RAF Swinderby.

Conclusion

The Council wishes to reiterate that in our view the submission of this request for a Scoping Opinion is clearly premature. It has been submitted prior to the commencement of the non-statutory consultation process which will only take place later this year and furthermore there has been no dialogue or initial engagement, as far as we are aware, with any other consultees with an interest in these proposals.

Our position is that this cannot then have allowed the applicant to have meaningfully considered, reflected upon, and addressed even any initial representations made during this initial phase. On that basis our view is that this submission is clearly contrary to the guidance set out in Advice Note Seven 'Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements'.

We are concerned that the timescales adopted unilaterally by the applicant – culminating in this Reg. 10 and 11 Scoping Opinion request to the Planning Inspectorate - has undermined the degree to which the information contained in the Scoping Report could be relied upon as a robust representation of the potential significant environmental effects of the proposed development.

This is borne out by the relatively large number of unknown factors or matters 'to be agreed' with relevant consultees. There is no indicative site layout and the cable connection corridor options are extensive. A particular concern is that as far as the Council are aware there is no National Grid connection proposal currently before the applicant; with only loose references to a new substation proposed 'near Navenby' into which the Fosse Green proposals will presumably connect. This reinforces our concerns regarding the prematurity of this submission. On that basis the Council's view is that the Planning Inspectorate should decline to accept the applicant's request for a Scoping Opinion at this stage.

Yours faithfully

[redacted]

Development Manager
Planning Services

Appendix 1 – Heritage Trust of Lincolnshire response
Appendix 2 – Landscope Land & Property response

Cultural Heritage (archaeology) - comment on Fosse Green Energy Environmental Impact Assessment Scoping Report

Environmental Impact Assessment (EIA) Scoping Report requesting *Scoping Opinion for the installation of solar photovoltaic (PV) generating panels and on-site Battery Energy Storage System (BESS) and associated infrastructure. …. (the 'Proposed Development') at land approximately 9 kilometres (km) south-west of Lincoln (the 'Site').* The Site comprises *land for the solar PV, BESS and associated infrastructure (referred to as the 'Solar and Energy Storage Park') and land for three grid connection route options (referred to as 'Grid Connection Corridor Options') to connect the Solar and Energy Storage Park to a proposed National Grid substation.*

Study areas:
The Cultural Heritage section (Chapter 8) of the Scoping Report states that the study areas have been defined as 1km from the site boundary for non-designated heritage assets and 3km from the site boundary for designated assets.

The search areas for the desk-based assessment should be 2km from the site boundary (including the cable route options) for non-designated heritage and 5km from the site boundary for designated heritage assets. This is in line with Lincolnshire County Council's (LCC) guidance entitled 'Guidance for large schemes including NSIPs and EIAs, General Scoping Opinion for the Historic Environment'.

The Settings Assessment/Heritage Impact Assessment needs to demonstrate an understanding of the significance and context of each of the assets in order to assess the impact of the development upon them and propose any mitigation.

Consultees:
The Report states (8.6.10) that consultation will be undertaken with relevant heritage bodies including Historic England; The Historic Environment Officers for Lincolnshire; and The Conservation Officer for North Kesteven District Council.

Consultation on cultural heritage, relating to matters on archaeology, should also include the archaeological advisor to North Kesteven District planning authority.

Baseline conditions:
The baseline described in the Report comprises a summary overview of the designated and non-designated heritage assets recorded in the current search areas. No further studies are reported or summarised in the Scoping Report.

Data sources:
The desk-based assessment should take into account a search of the recommended study areas (see above). The full suite of desk-based information needs to be assessed to inform the baseline. Desk based sources should include LiDAR and aerial photo coverage and assessment. The LCC guidance document (mentioned above) also sets out the data sources that should be included to inform the baseline conditions. The scope (content) of the individual desk-based assessments should be established in discussion with the archaeological consultees.

The Report (8.6.13) states that *The desk-based research will be supported by a programme of non-intrusive and intrusive archaeological evaluation.*

The EIA will require desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact.

Geophysical survey:
It is stated that geophysical survey will be undertaken within the Solar and Energy Storage Park and along the Grid Connection Corridor, once a single route option has been selected.

Geophysical surveys are required across all areas of potential impact. The results of the geophysical survey will inform the programme of trial trenching required.

Trial trench evaluation:
The report states *trial trenching evaluation and detailed setting assessments will be undertaken as part of the assessment process.*

The results of the full desk-based assessment, including the aerial photographic and Lidar assessments, together with the results of the geophysical survey will inform the programme of trial trench evaluation.

Trial trenching is required to establish the baseline conditions and to understand the nature and extent of the impacts on the archaeological remains. In order to determine the presence, absence, significance, the depth and extent of any archaeological remains which could be impacted by the development, trial trenching should target areas where archaeological remains have been identified in the foregoing, non-intrusive surveys as well as areas where the surveys have not detected archaeological remains.

The programmes of archaeological evaluation should be set out in a written scheme(s) of investigation (WSIs)s to be agreed with the archaeological consultees prior to commencement of the field investigation(s).

Environmental Statement:
The report states the ES will detail *the results of the environmental assessment, likely significant effects arising from the Proposed Development, and the proposed mitigation measures* … and … i*dentify opportunities for social and economic benefits and environmental enhancement.*

The EIA will require desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of the proposed impact. Without the relevant surveys and site evaluation it will not be possible to assess the likely significant effects of the proposed development and design an appropriate mitigation strategy.

The results of the trial trenching, together with the foregoing assessments and surveys, should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation to be presented in the ES.

The EIA should consider opportunities for enhancing the environment and the positive and beneficial effects of the programme of archaeological surveys and investigations to be undertaken during EIA process and the added value that a large development can make to archaeology and cultural heritage. The programme of archaeological works should include proposals for community outreach, public engagement and dissemination of the results.

Decommissioning:
The nature of the archaeological resource has yet to be determined and assessed and, for example where identified assets may have been avoided / protected in situ during construction / operation

they may be under threat from disturbance or destruction during decommissioning. Therefore, cultural heritage should be a consideration as part of any outline decommissioning plans.

References:
Reference should be made to planning and specialist cultural heritage and archaeological guidance and standards and should include the Lincolnshire County Council Archaeology Handbook which sets out requirements for work in the county, including archiving and deposition.

In summary, the process described in the Report is at an early stage and there is limited available information. No elements of the cultural assessment have been scoped at this stage.

The ES will need to contain sufficient information on the archaeological potential and must include evidential information on the depth, extent and significance of the archaeological deposits which will be impacted by the development. The results will inform a fit for purpose mitigation strategy which will identify what measures are to be taken to minimise or adequately record the impact of the proposal on archaeological remains.

The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework.

Heritage Lincolnshire
July 2023

Soils and ALC Fosse Green Energy Solar Project

North Kesteven District Council

July 2023

Contents

Review of ALC and Soils Fosse Green Solar Project

Instructions to Landscope

Landscope – Review Chapter 13 Socio Economics and Land Use.

1. The Site and Proposal

The Proposed Development comprises the installation of solar photovoltaic (PV) generating modules, battery storage facilities, and grid connection infrastructure with a capacity in the region of 350mw.

The Site is located within the administrative boundary of North Kesteven District Council, in the county of Lincolnshire. The Site measures approximately 1,000 hectares (ha) and extends across the A46. The Site boundary and land parcels are presented in **Appendix 1**. It also shows the search corridors for the underground cabling proposed.

2. Agricultural Land Classification and Soils

The majority of the site is shown as Grade 3 and/or Grade 2 on the provisional ALC maps of the area. **Appendix 2** shows the approximate location of the 2 main areas in relation to land grades. The scoping document indicates that:-

13.6.3 As described below, an ALC soil survey will be undertaken for the land parcels within the Site boundary, as deemed necessary.

Appendix 2 also shows the likelihood of best and most versatile land (BMV) in the general area. Large parts of the site fall within the higher categories, where 40-60% of the land is likely to be BMV.

It is important that the ALC survey is undertaken in line with the MAFF 1988 guidelines and TIN049. These documents set out the precise methodology by which the ALC survey should be undertaken, with auger bore sampling at 1 hectare intervals and a suitable number of soil pits dug to determine the precise nature of the soil(s).

Soils, parent material, geology and soil types.
The principle underlying geology at the site is a Lower Lias Clay, Shale and Rare Limestone.

Publicly available soils mapping and local knowledge, including the Soil Survey of England and Wales have mapped the soils in 1983, at a reconnaissance scale of 1:250,000 and shows the primary soil associations to include Soil Type **711f Wickham**, described as slowly permeable seasonally waterlogged fine loamy over clayey, fine silty over clayey and clayey soils. Small areas of slowly permeable calcareous soils are found on steeper slopes. **711f Wickham** is described in detail in **Appendix 4** with information taken from the Cranfield University Landis, website, 'The Soils Guide'.
Previous ALC surveys locally on these soils and similar have indicated a mixture of Grades 2, 3a and 3b land. It is likely that the shallower and heavier soils will be 3b, whilst deeper soils will be 3a or Grade 2.

The ALC should identify where BMV land is and the scheme should seek to protect and minimise damage to higher grade land wherever possible in line with national planning policy. There is undoubtedly a lot of BMV land in this vicinity and only a full ALC will identify where it is and what the Grade and quality is. Laboratory analysis of representative samples should be used to determine textures.

3 From viewing the maps included in the report it seems likely that 50-100% of the cable route will be BMV, where any loss is likely to be significant. However, irrespective of the land quality issues, there will be matters of concern to farmers and landowners including:-

- Land drainage
- Weed burden
- Biosecurity for plant diseases
- Timeliness of soil stripping, storage and handling
- Compaction of subsoil
- Re-instatement to previous quality/standard

These matters will need to be addressed if the scheme is to proceed.

4 Cumulative Impacts including District ALC

There are a number of small(er) and largescale Solar PV schemes in Lincolnshire, with others planned or proposed. There are five known solar project NSIP schemes; specifically in relation to impacts on agricultural land. The situation is a moving picture as new proposals come froward from time to time. Most of these sites are proposed on farmland. Lincolnshire and N Kesteven in particular are agricultural areas with substantial areas for land within the Best and Most Versatile category. Much of the non BMV land will be Grades 3b and 4 with very little Grade 5.

A county-level alternative assessment area should be applied which as a minimum should consider scope for connection into the National Grid at the locations proposed by the registered NSIP solar projects named above, and with specific consideration of agricultural land impacts.

For a project of this scale where the project will tie up the land for up to 40 years, there will be some impact. The area is large locally and if the quantities of BMV are as expected or similar then the impact will be moderately significant. However if the BMV is greater and of higher grades then I would expect the impact to be more significant at a District Level. Environmental Impact Assessments give guidance on the size and quality of Land Grade that is or can be affected by development proposals. The loss of such a large area of land would normally be considered as significant at District level, even though the use is 'temporary'. Any permanent loss of land due either to construction or through biodiversity designation may affect this assessment further.

5 Sheep Farming and Other Farming Impact

This part of Lincolnshire is a mainly arable farming area with only limited sheep grazing operations. Whilst it is perfectly possible to graze the areas under and between the panels, it is unlikely to be very cost effective for a grazier. The difficulties of rounding up sheep and handling them, together with finding sick or wounded animals makes the grazier's workload harder and more complex.

As such the economics of moving sheep to and from the site will be marginal. However, most examples quoted do not charge much or anything for the grazing and this may make it sufficiently attractive for a local farmer or shepherd with a 'flying flock'.

Land in use for solar panels is generally ineligible for the normal agricultural subsidies, such as the Basic Payment Scheme (now being phased out) and the Environmental Land Management Scheme (ELMS). It does not prevent land from being managed in similar ways, but there will be no payments available to farmers (e.g. graziers) for compliance and this could make farming less financially attractive going forward.

The site will probably have to be (re)seeded to grass, or species rich grassland, but this will probably occur after the panels have been sited on the land. In my experience grass does not grow well under the panels themselves. There are often areas that are dry and barren or that only host weeds species, due to heavy shading.

As part of any environmental statement there should be an impact statement with reference to the farm holdings affected by the proposal. This should address viability, infrastructure and long term consequences on the individual holding.

6 Construction Phase

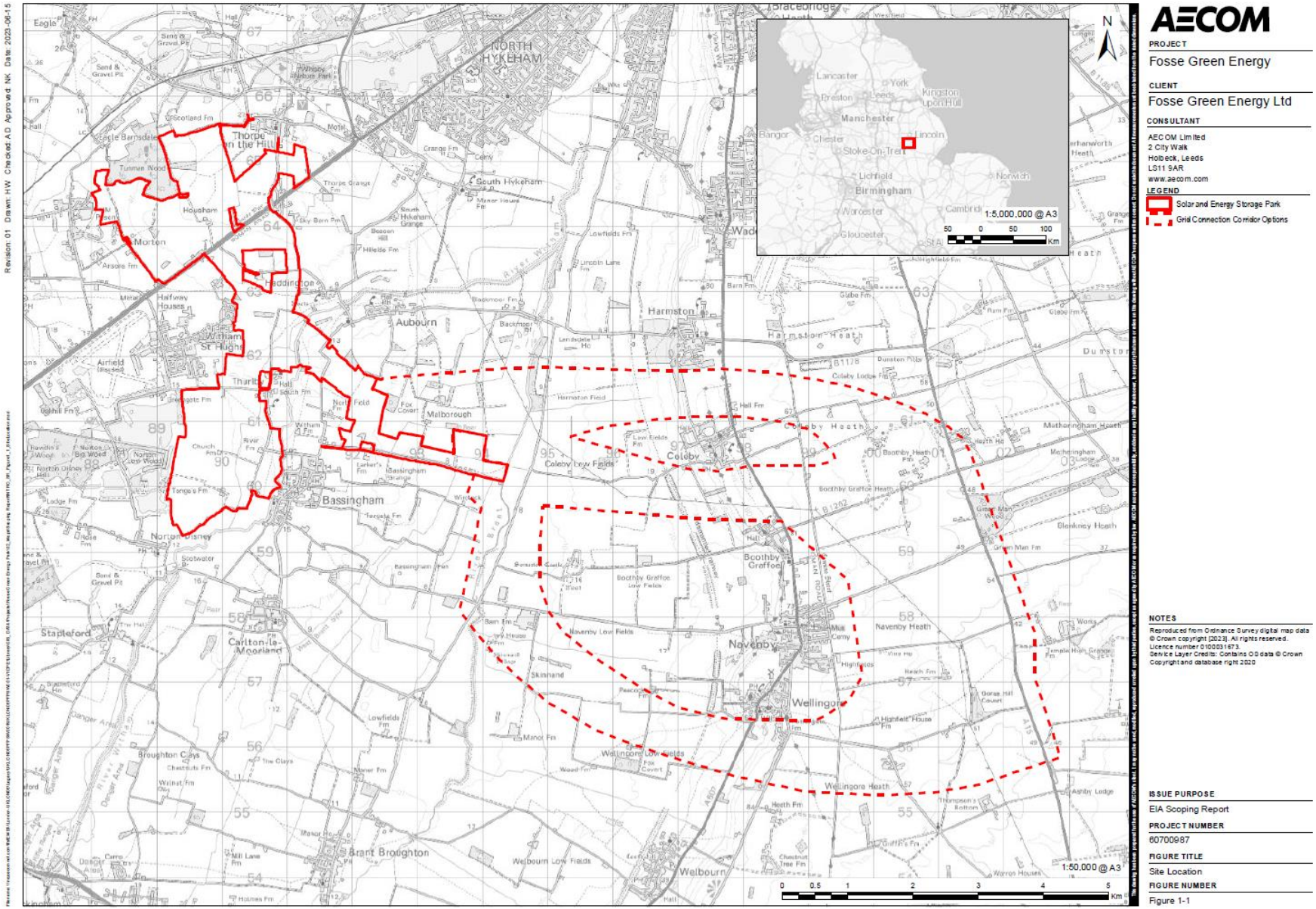
Soil Damage During Construction

Soil structure can be significantly damaged during the construction phase of the process. There is a lot of trafficking of vehicles on the land to erect the panels and if this work is undertaken when soils are wet, there can be significant damage. Much of this damage can be remedied post construction but not all and it is possible that long term drainage issues occur on the site due to the construction.

During the construction phase many of the areas will affect soil and water issues. **Appendix 5** sets out a basic Soil Management Plan that should be established as part of the Construction Phase, to minimise the impact on soil resources. The following headings should be included in the Soil Management Plan.

- Site preparation;
- Import of construction materials, plant and equipment to Site;
- Establishment of Site construction compounds and welfare facilities;
- Cable installation;
- Temporary construction compounds;
- Trenching in sections
- Upgrading existing tracks and construction of new access
- roads within the Site;
- The upgrade or construction of crossing points (bridges /culverts) at drainage ditches within the Site;
- Appropriate storage and capping of soil;
- Appropriate construction drainage;
- Sectionalised approach of duct installation;
- Excavation and installation of jointing pits;
- Cable pulling;
- Testing and commissioning; and
- Site reinstatement (i.e. returning any land used during construction, for temporary purposes, back to its previous condition).
- Use of borrow pits

Appendix 1



AECOM

PROJECT
Fosse Green Energy

CLIENT
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CONSULTANT

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LEGEND
- Solar and Energy Storage Park
- Grid Connection Corridor Options

NOTES

ISSUE PURPOSE
EIA Scoping Report

PROJECT NUMBER
60700987

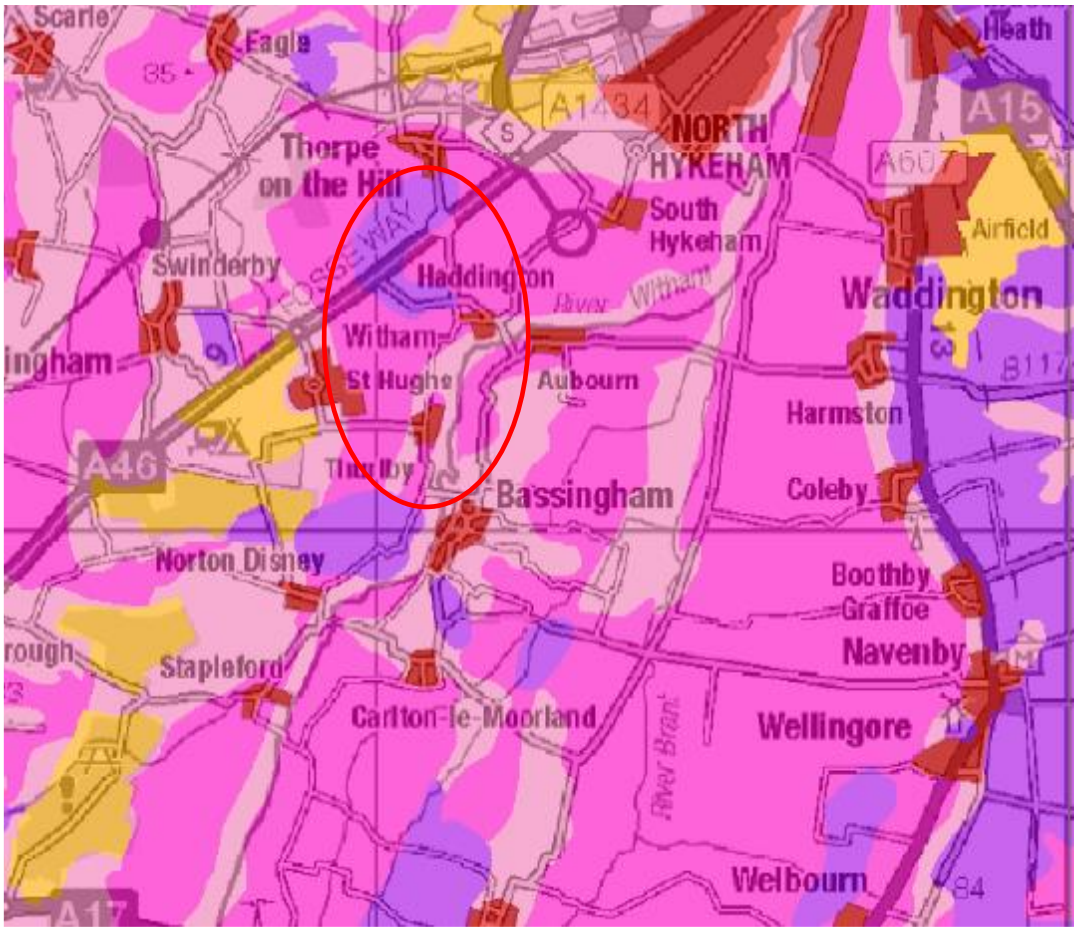
FIGURE TITLE
Site Location

FIGURE NUMBER
Figure 1-1

Appendix 2

Figure 1 below is the DEFRA Predictive Best and Most Versatile Land Map.

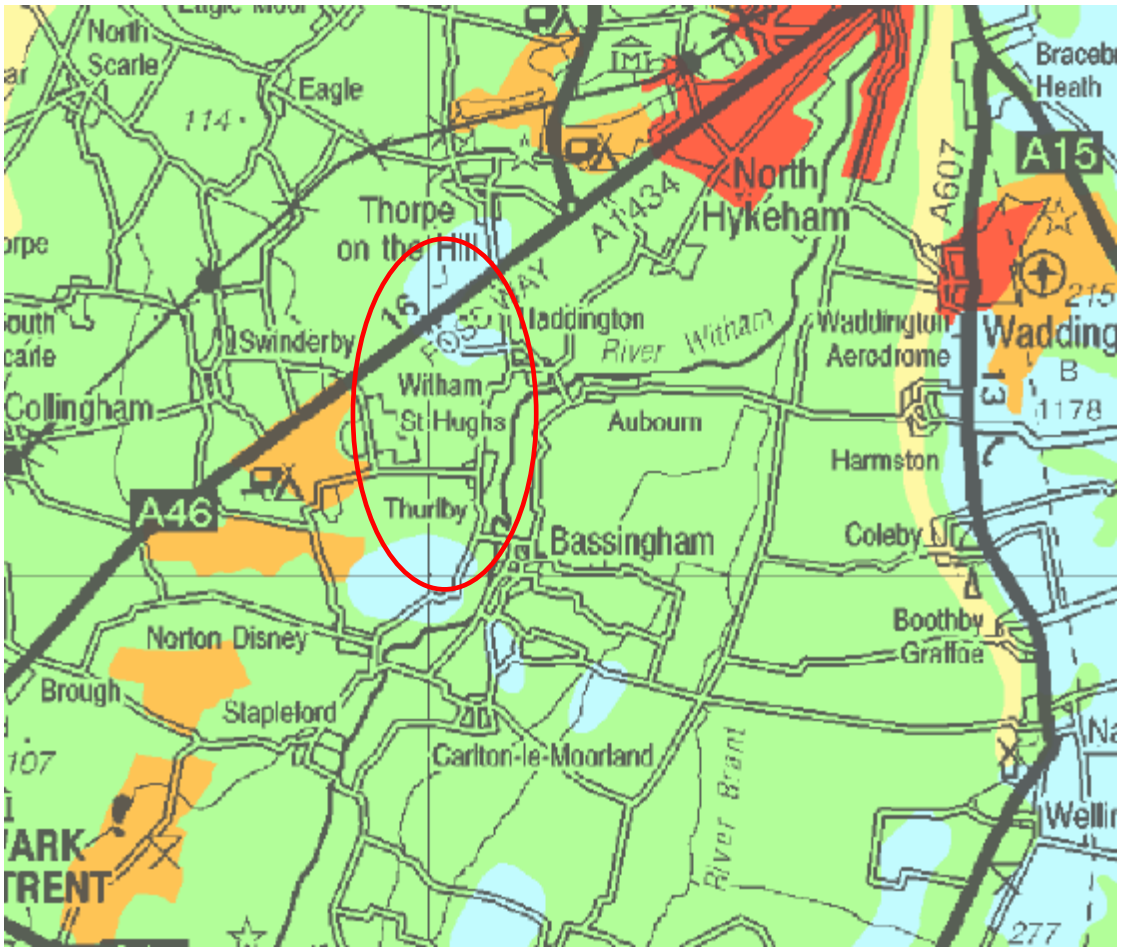
The map shows a Medium to High likelihood of best and most versatile land for this area



Predictive BMV Land Assesment © Defra

- High likelihood of BMV land (>60% area bmv)
- Moderate likelihood of BMV land (20 - 60% area bmv)
- Low likelihood of BMV land (<= 20% area bmv)
- Non-agricultural use
- Urban / Industrial

Figure 2 below is the 1:250 000 scale map (East Midlands) which shows the area as Grade 3 and some Grade 2 quality.



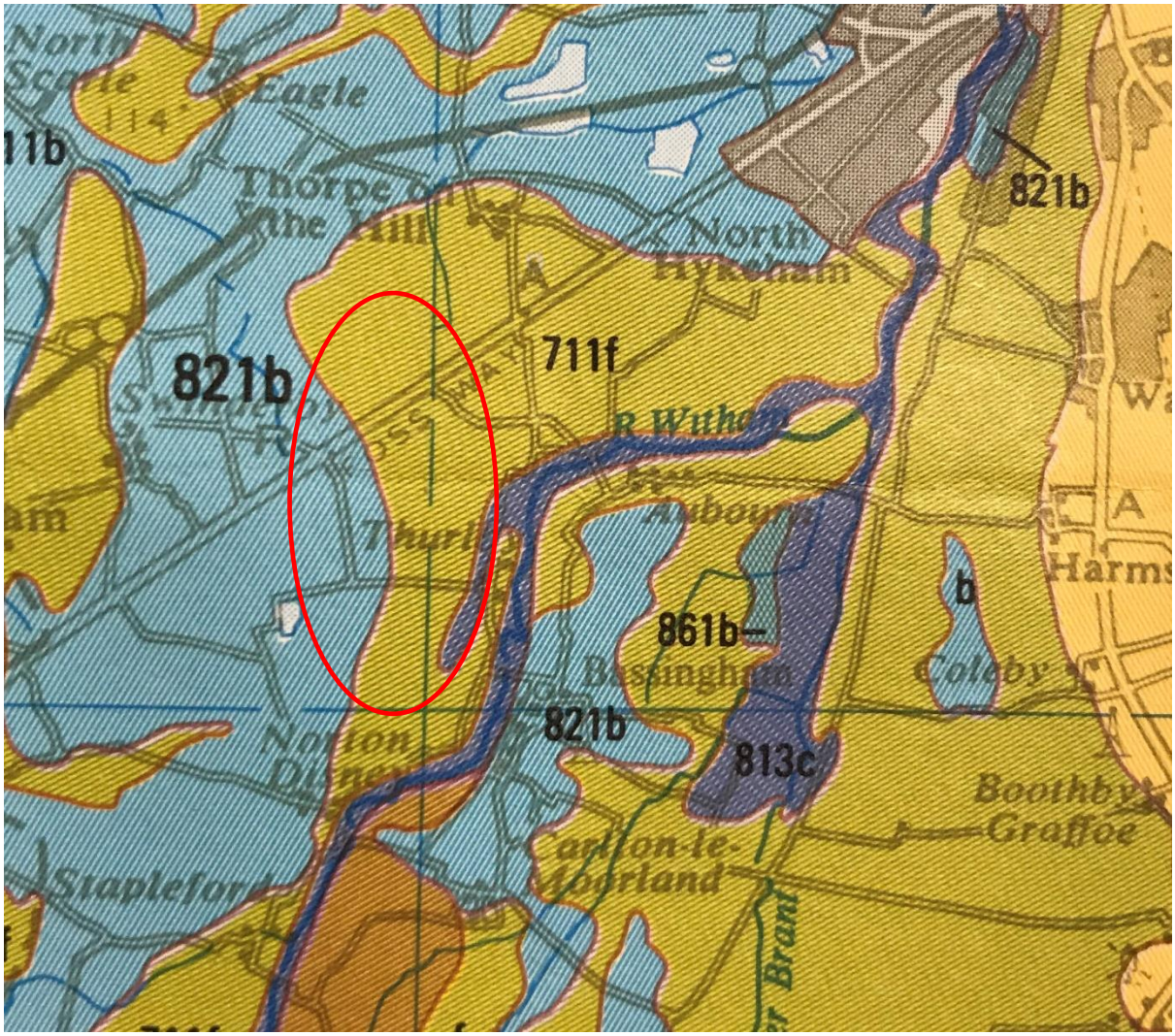
Grade	Description
1	Excellent
2	Very Good
3	Good to Moderate
4	Poor
5	Very Poor

Non-Agricultural Land

- Other land primarily in non-agricultural use
- Land predominantly in urban use

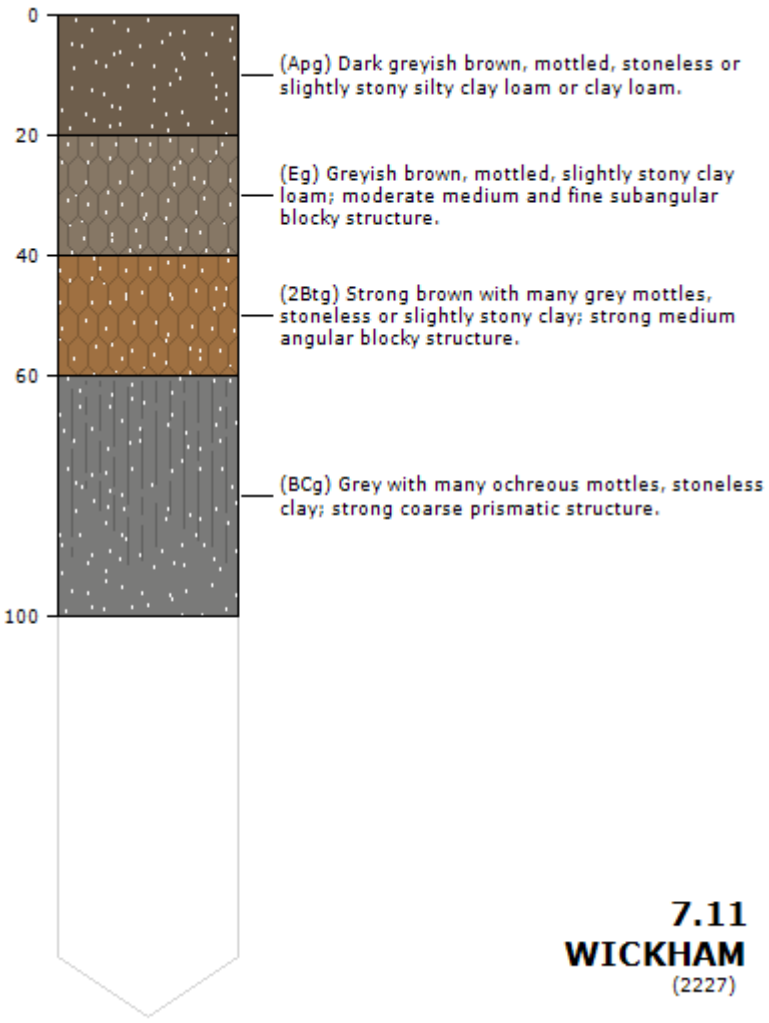
Appendix 3

Soil Survey of England Maps of Area



Appendix 4

Brief Profile Description of Wickham 2 Soils



0711f WICKHAM 2

Detailed Description

This association is extensive where thin loamy drift covers Jurassic and Cretaceous clay shales. It consists mainly of fine loamy over clayey typical stagnogley soils of the Wickham series but, where drift is absent, clayey soils of the Denchworth series are common. The better-drained stagnogleyic argillic brown earths of the Oxpasture series and calcareous clayey soils of the Evesham series, are sporadically distributed. There are many small inclusions of other soils; these are described below and are listed in the key.

The association covers approximately 320 km² mainly in valleys but also on plateaux of Middle and Upper Jurassic rocks in east Leicestershire where Wickham soils have a larger than average silt content. Narrow alluvial flats along many valleys carry clayey, wet Fladbury soils and in south Leicestershire there are calcareous St Lawrence series. Clayey Holdenby and Lawford soils are associated with patches of clayey drift. On the Rhaetic and Lower Lias sediments in east Worcestershire where the country rock is more calcareous than

elsewhere, Evesham and Haselor soils and the former Wedmore series are important associates.

This association covers 545 km² in Eastern England mainly in Lincolnshire and Northamptonshire but also in west Norfolk. In Lincolnshire it is mainly in the Lias Clay vale between Lincoln and Newark where the Trent river terrace deposits are a source for the superficial loamy drift. Patches of sand and gravel give small inclusions of Quorndon soils, and some coarse loamy over clayey soils of the Kings Newton series occur on the edge of the river terraces. Oxpasture soils become increasingly common towards the limestone scarp of Lincoln Edge, and small patches of Beccles soils are included where the association abuts chalky till. Evesham soils are uncommon in the Lias vale and are found mainly in south-west Lincolnshire. However, Oxpasture and Evesham soils are more common on Upper Jurassic and Cretaceous rocks bordering the Fens. The association also occurs in the Ancholme valley north of Lincoln; north-east and east of Lincoln on slopes of narrow valleys cut into chalky till; on the western edge of the Wolds; and in the deeply dissected valleys of the southern Wolds. In Northamptonshire the association occurs both in narrow valleys cut into the clay shales and on the plateaux formed by Upper Jurassic rocks. Here in the valleys, Evesham soils are less frequent than elsewhere and in general the soils on the hilltops are siltier than those in the vales, and Oxpasture soils are common. Quorndon soils are a common inclusion in west Norfolk on flat or gently sloping land at the foot of the chalk scarp. Here Oxpasture soils are not found.

In the South West, the proportion of Wickham and Denchworth soils is greater than in the Midlands. Lawford profiles are common in places, but Evesham and Oxpasture soils are relatively rare. The association, which covers about 300 km², occurs mainly in the wide vales of Gloucestershire, Wiltshire, Somerset and Dorset on Jurassic and Gault Clays. It also occurs on the Oligocene clays of the Bovey and Petrockstow basins, where Wickham and clayey Teigngrace soils occupy two-thirds of the mapped area and the ancillary soils mainly belong to the Ipstones and Brickfield series. There is also some disturbed ground and waste heaps from ball clay working. Small patches of Oak and Hornbeam soils are included on the gravels that cap small knolls in Dorset and south Somerset, and in north Wiltshire where the gravels contain flint and sarsen stone derived from the chalk outcrop to the south.

In South East England the association occurs on low ground in Oxfordshire and Buckinghamshire, over Lower Lias, Oxford, Kimmeridge and Gault Clays. On the Lias, it is present on the lower slopes of valleys, particularly along the Cherwell, below ridges capped by Middle Lias ironstone or Great Oolite limestone. Elsewhere the association occurs below the Corallian scarp and at the margins of river terraces. Oxpasture soils feature only occasionally, and Evesham soils are restricted to river terrace bluffs and to ground near the Corallian scarp. Some Kings Newton soils have been recorded on the terrace drifts and near the Upper Greensand outcrop. Where the drift is clayey, Lawford soils occur. Rowsham soils have been recorded in the Tiddington area.

In Northern England the association covers 45 km², principally in the Howardian Hills of North Yorkshire. Here it occurs on plateau sites where thin drift from weathered sandstone and siltstones covers clay shale. In Humberside, small areas near Brigg, in valley drift, and near Kirton-in-Lindsey, on Head below the Lincolnshire Limestone escarpment, have fewer clayey inclusions than elsewhere.

Soil Water Regime

Occurring mainly on level or gently sloping sites, these soils which have slowly permeable subsoils are seasonally waterlogged (Wetness Class III and IV). Wickham, Evesham and Oxpasture soils respond well to artificial drainage hut, because of their poor hydraulic

conductivity, the Denchworth and Lawford series are more difficult to drain effectively. When the soils are waterlogged, excess water moves laterally mostly as surface run-off.

In the South West of England having slowly permeable subsoils and sited mainly on level or near-level ground the soils are waterlogged for prolonged periods during the growing season (Wetness Class V) where average annual rainfall exceeds 800 mm. In drier districts like north Gloucestershire, waterlogging is generally confined to winter (Wetness Class III).

Cropping and Land Use

Over much of this association the land is used for cereals and ley grassland. Oilseed rape has expanded recently and provides an alternative break crop to ley grassland. There is little opportunity for spring cultivation so almost all cereals are autumn-sown. Cereal yields may be reduced by slight droughtiness. Soil structure is easily damaged if the soils are cultivated when wet and careful timing of field operations is critical. Grass yields are restricted by drought and the grazing period is limited during spring and autumn because of a risk of poaching. Wickham and Denchworth soils are acid in reaction but, Evesham and Haselor soils are neutral or slightly alkaline. In wetter districts most of the soils are under long-term grassland with small areas of autumn sown cereals. The grass yields are potentially large, and most of the soils are only slightly droughty though the grazing season is shortened because of the risk of poaching. In the wettest places, the maximum safe grazing period is as little as 100 days. Where the average annual rainfall is below 750 mm ley-arable farming is more usual. Where cultivated, the soils suffer from compaction and structural damage by machinery and the timing of cultivations is critical. Phosphorus levels are naturally low, but potassium is adequate for most plant needs.

Appendix 5

Soil Management Plan (Outline)

1. The soil stripping, handling, storage and replacement operations should be undertaken in a manner that is consistent with suitable specification and methodology set out in a Soil Management Plan.
2. All topsoil and subsoil material shall be stripped from areas affected by top soil storage bunds, subsoil storage bunds, general fill bunds, hard-standings and other constructions including temporary access roads and vehicle trafficking routes, and shall be stored separately in bunds from any imported material and shall be used for the restoration of the temporary soil storage site unless otherwise agreed in writing by the Local Planning Authority.
3. Soils should be stripped, stored and replaced in line with the MAFF Good Practice Guide for Handling Soils Sheets 1, 2, 3 and 4 - http://webarchive.nationalarchives.gov.uk/20090306103114/http:/www.defra.gov.uk/farm/environment/land-use/soilguid/index.htm .
4. Topsoil and subsoil storage bunds should be placed in approved locations and constructed to ensure secure storage without damage, loss or contamination.
5. Topsoil and subsoil should be stored in bunds not exceeding 3m in height above adjacent existing ground level and shall be constructed and shaped by excavator only (dump trucks should not traffic across the bunds at any time).
6. Imported general fill material should be stored in bunds not exceeding 4m in height above adjacent existing ground level.
7. Bunds should be seeded to grass at the earliest opportunity and shall not be allowed to over-winter without grass cover.
8. No topsoil or subsoil should be sold or otherwise removed from the site.
9. Within 3 months of their construction, the Developer should provide a detailed plan of soil storage bunds showing details of position, volume and soil type. The Developer shall be responsible for maintaining an up-to-date record of all soil storage and general fill bunds throughout the life of the site.
10. The stripping, movement and re-spreading of topsoil and subsoil material should only be undertaken when the topsoil and subsoil material is in a dry and friable condition and the ground is sufficiently dry to allow the passage of heavy machinery and vehicles over it without damage to the soils.
11. All injurious weeds, as defined by the Weeds Act 1959, growing within the working site should be eradicated or adequately controlled by approved method.
12. All vegetation growing on soil storage bunds and peripheral areas within the site should be kept in tidy condition by cutting at least once during the growing season.
13. The boundary of the development should be made stock proof for the duration of the temporary development.
14. All temporary plant, machinery, buildings, fixed equipment, roads and areas of hard standing including site compounds should be removed.
15. The natural subsoil base material should be comprehensively ripped to a minimum depth of 500mm to break up surface compaction before any soil material is spread. The developer should give the Planning Authority notice of an intention to carry out this operation. All large stones and boulders, wire rope and other foreign material arising should be removed. Special attention should be given to areas of excessive compaction such as haul roads where deeper ripping may be necessary.

16. The Developer should be responsible for providing all necessary training of operatives and site supervision by suitably qualified personnel to ensure that the soil replacement operation is carried out in the approved manner.
17. Prior to the commencement of spreading soil, all stones, boulders or foreign objects likely to impede normal agricultural cultivations should be removed from that area.
18. The soil material set aside for use in any agricultural restoration should be spread uniformly in the correct sequence (subsoil followed by topsoil) over the ripped base material, and should be rooted and scarified to full depth without causing mixing between different soil layers. The reinstated agricultural soil profile should be total 450mm thickness overlying prepared and free draining natural stony base material, and should consist of 250mm topsoil and 200mm subsoil derived from the soil stripping operation. This soil profile should meet the technical requirements of the identified Agricultural Land Classification Grade on restoration.
19. All base material ripping, soil spreading and cultivation operations should be carried out in such a manner as to minimise compaction and achieve unimpeded drainage down through the soil profile.
20. Any part of the site restored for agricultural purposes which is affected by localised settlement that adversely affects the agricultural after use should be re-graded including the re-construction of the soil profile to approved specification.
21. Following restoration of the soil materials, the land will be cultivated, seeded and managed appropriately for a minimum of a year and until agreed with the Local Planning Authority that the land meets satisfactory requirements.

From:	BCW Planning
To:	Fosse Green Energy
Subject:	RE: EN010154 – Fosse Green Energy – EIA Scoping Notification and Consultation
Date:	29 June 2023 10:38:31
Attachments:	image001.jpg image003.jpg

Good morning,

Thank you for the below consultation.

North Northamptonshire Council (Wellingborough Team) have no comments or objections.

Kind regards

Planning Admin | planning.bcw@northnorthants.gov.uk
North Northamptonshire Council
Swanspool House, Doddington Road, Wellingborough, Northants, NN8 1BP
T: 0300 126 3000 | DD: [redacted]

Twitter: @NNorthantsC
Facebook: @NorthNorthants
Web: www.northnorthants.gov.uk

From: [redacted]
To:
Cc:

Subject: EN010154 - Fosse Green Energy - EIA Scoping Notification and Consultation
Date: 16 July 2023 14:04:27

Dear Planning Inspectorate

Reference your communication in June regarding the above subject, in view of your imposed deadline for submissions being 18th July, Norton Disney Parish Council objects to the proposals for the following reasons, which are not finite:

1. There has been no consultation by/with Fosse Green Energy. An imposed deadline for submissions by affected communities prior to any form of consultation on such a large proposal is ludicrous and is bound to foster 'hostility'.

2. If the scheme is approved, the whole rural area, which, for centuries has been predominantly based on agriculture and associated businesses, will be transformed into a 'sea' of solar panels almost as far as the eye can see, especially in view of the landscape. It will not only be visually appalling, but will have other knock on consequences, below.

3. Its possible devastating effect on wildlife, property values and rural infrastructure.

4. A mixture of much smaller solar panel sites and wind turbines would be preferable and may generate as much energy.

A more considered opinion on this subject will be possible after Fosse Green Energy's consultation in the autumn.

Yours sincerely

Martin Salmon
Norton Disney Parish Clerk

From: [redacted]
To: Fosse Green Energy
Subject: EN010154 - Fosse Green
Date: 11 July 2023 14:55:17

Thank you for consulting Nottinghamshire CC on the above proposal, we have no comments to make at this stage of the project.

Regards

Nina
Principal Planner (Policy)
Place, Nottinghamshire County Council
County Hall
West Bridgford
NG2 7QP

[redacted]

Telephone: [redacted] (9am - 1pm Mon, Wed, Fri)
Email: planningcontrol@peterborough.gov.uk
Case Officer: Connor Liken
Our Ref: 23/00821/CONSUL
Your Ref: EN010154

PETERBOROUGH CITY COUNCIL

Planning Services

Sand Martin House
Bittern Way
Fletton Quays
Peterborough
PE2 8TY

Peterborough Direct: [redacted]

Ms Lucy Hicks
The Planning Inspectorate
The Planning Inspectorate,
3M Kite,
Temple Quay,
Bristol,
BS1 6PN

5 July 2023

Dear Ms Hicks

Planning enquiry

Proposal: Fosse Green Energy

Site address: Fosse Green Energy

Your client: Fosse Green Energy Ltd Fosse Green Energy Ltd

Further to your enquiry received on 20 June 2023, in respect of the above, the Local Planning Authority makes the following comments:

Thank you for the opportunity to make comments on the application submitted by Fosse Green Energy.

Having reviewed the submitted information, Peterborough City Council has **no comments** to make.

I trust that the above advice is of use however should you have any further queries, please do not hesitate to contact me on the details shown at the top of this letter.

Yours sincerely

Connor Liken
Development Management Officer

From: Asset.Protection
To: Fosse Green Energy
Subject: Fosse Green Energy Limited EN010154 J-230622-22038
Date: 04 July 2023 16:02:42
Attachments: image001.jpg

ST Classification: UNMARKED

Good afternoon

We have no comments at this early stage. We look forward to any consultations required as the scheme progresses.

Kind regards
Anna Cheung

Asset Protection
Asset Strategy & Planning
Chief Engineer

image001

From: _planningadvice
To: Fosse Green Energy
Cc: [redacted]
Subject: FW: EN010154 – Fosse Green Energy – EIA Scoping Notification and Consultation
Date: 22 June 2023 10:57:01
Attachments: image004.jpg
image001.png

Good Morning,

I can confirm that SHDC have no comments to make on this.

Kind regards,
Jess

Jess Francis
Planning Support Officer
South Holland District Council
T: [redacted]
www.sholland.gov.uk

RESPONSE FROM THORPE ON THE HILL PARISH COUNCIL ON THE FOSSE GREEN SCOPING CONSULTATION

July 17th, 2023

Firstly, while not directly germane to the Environmental Statement for Fosse Green, the Parish Council would like to endorse the following statement from Lincolnshire County Council, in relation to the cumulative effects of solar developments on our county.

The County Council informs the Examining Authority in its written response that whilst the project would produce clean renewable energy that would support the nations transition to a low carbon future and deliver significant biodiversity net gain benefits through the creation of mitigation and enhancements as well as other more limited positive impacts (as identified within our Local Impact Report), these positive impacts are not outweighed by the negative, some significant, impacts that arise given the overall size and scale of the development both on its own and in combination with the three other solar projects proposed in this geographical area.

This is due to the long term and negative impacts that this proposal would have on the landscape character and appearance of the area through the replacement of large areas of agricultural with Solar development together with the cumulative impact from the other three solar projects in this area.

The cumulative change to the landscape will be considerable, and the combination of two or more solar projects has the potential to change the local landscape character at a scale that would be "of more than local significance" or would be "in breach of recognised acceptability, legislation, policy or standards".

The cumulative impact of the four adjacent NSIP solar sites has the potential to affect the landscape at a regional scale through predominantly a change in land use: from arable to solar, creating an "energy landscape" as opposed to rural/agricultural one at present.

This also has the potential to change the character from an agricultural landscape to that of an "energy" landscape when traveling through the area, and the sequential effects of multiple large scale solar sites, of which some are spread over extensive, fragmented redline boundaries, exacerbating the perception of being surrounded by solar development.

In addition, the loss of arable agricultural land classed as Best and Most Versatile would have a cumulative or defined negative impact that will result in the loss of agricultural production in the development area generally and/or the permanent loss of production from mostly medium quality agricultural Page 13 land.

A county-level alternative assessment area should be applied which as a minimum should consider scope for connection into the National Grid at the locations proposed by the registered NSIP solar projects locally, and with specific consideration of agricultural land impacts. That if the Secretary of State grants the Development Consent Order a comprehensive and appropriate package of Community Benefits is secured and delivered to compensate for the identified negative impacts that the proposed development would cause to the communities affected by this project.

SPECIFIC REQUESTS FOR ADDITIONAL CONTENT TO BE INCLUDED IN THE ES

SUMMARY OF REQUESTS

Thorpe on the Hill Parish Council request that an Agricultural Land Classification Report should be submitted as part of the ES, setting out the justification for the loss of BMV land and how criterion b of Policy 67 has been met. As required under Central Lincolnshire Local Plan 2023, Policy 67.

Thorpe on the Hill Parish Council request that the ES contains a full comparative analysis of all alternative technologies that could be employed, including wind turbines.

Thorpe on the Hill Parish Council request the ES contains full details of other sites considered, particularly brown field sites and those not including a high proportion of BMV land, and full details of why those sites were considered less suitable.

Thorpe on the Hill Parish Council request that the A46 woodland belt and other woodland as listed should be identified and included in the ES. It is further requested that trees and hedges along highway verges and field hedgerows should also be identified and included in the ES.

Thorpe on the Hill Parish Council request that the impact on birds, particularly water birds, is not scoped out of the ES.

Thorpe on the Hill Parish Council request that Stocking Wood be listed as a non-statutory site and, as such, the site boundary be redrawn to exclude Stocking Wood.

Thorpe on the Hill Parish Council request that a full assessment of the potential hazards and risk to life of placing an estimated 192 batteries, each 6.5m by 2.5m by 3m in proximity to residential housing be included in the ES. This should include a full impact assessment of a fire and explosion, not just a dismissal of these events as unlikely to happen. This assessment should take note that the UK's record temperature, 40.3 degrees centigrade, was recorded within 35 km of the proposed site.

Thorpe on the Hill Parish Council notes that no reference to Witham Valley Country Park is made in the scoping document. We request that the importance of the park is acknowledged in the ES. We further request that a full assessment of the environmental and socio-economic impact of placing a large solar farm in the centre of the park is included in the ES.

Thorpe on the Hill Parish Council requests that the scope of the LVIA be extended to cover views from the limestone ridge and the cliff villages, with full consideration of both normal visual impact and the enhanced impact created by glint and glare from the panels.

Thorpe on the Hill Parish Council request that, to allow consultees to fully appreciate the visual impact the solar farm will have on local walking routes, the Thorpe on the Hill Stepping out Leaflet is reproduced, replacing the current images with artist impressions of the views available should the development be completed.

Thorpe on the Hill Parish Council request that the ES contains an assessment of the aesthetic impact on public footpaths and bridleways within the boundaries, should the development be completed, and recognises the need to protect these vital public amenities.

Thorpe on the Hill Parish Council requests that the ES clarifies what the phrase 'have regard to' (11.3.11 of the scoping document) means in practice in relation to the ten protected views recorded in the Neighbourhood Plan. The Council further requests that artists impressions are

included in the ES showing the likely impact on these views should the development be completed.

Thorpe on the Hill Parish Council requests that the ES contains a full consideration of the impact the loss of 2,500 acres of BMV land will have on the GLLEP agri-food priority and further, that this impact assessment be set in the context of the cumulative land loss effect of other solar farms proposed in the area.

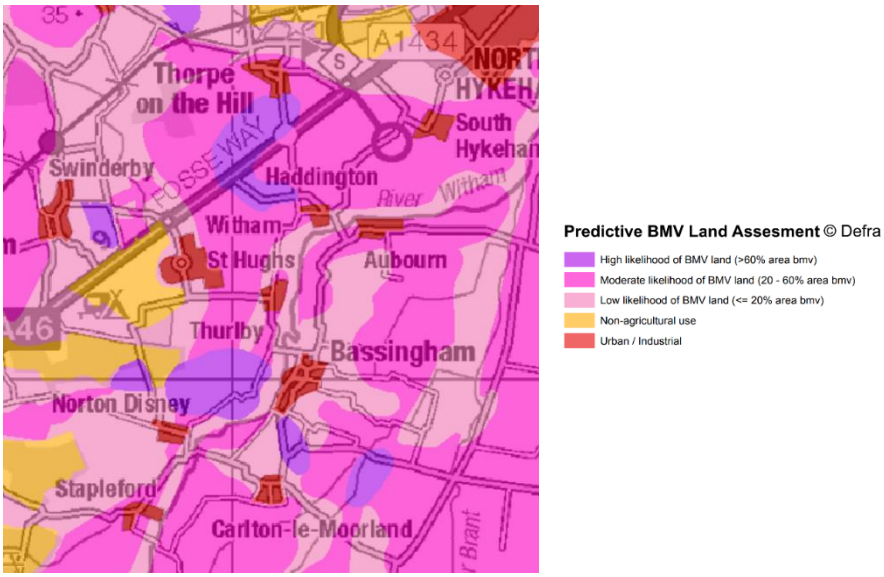
Thorpe on the Hill Parish Council request that a summary of a full consultation with the Ministry of Defence be included in the ES.

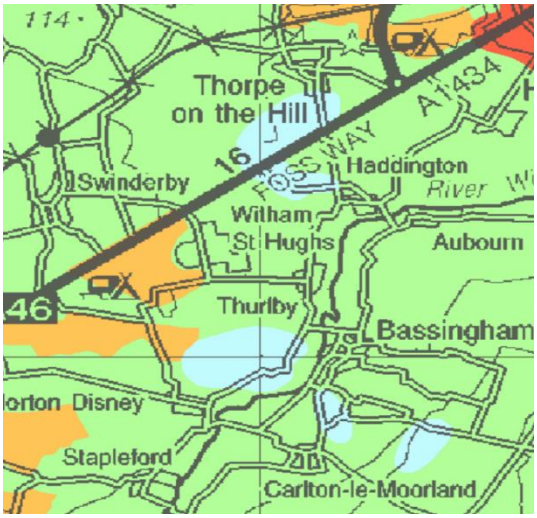
JUSTIFICATION FOR THE PARISH COUNCIL'S REQUESTS

USE OF BMV LAND

Thorpe on the Hill Parish Council consider the scoping report pays insufficient attention to BMV land.

The maps below show the probabilities that land is designated BMV (Best and most Versatile) within the proposed boundaries of Fosse Green. Most of the land earmarked for the solar farm falls into that category.





Thorpe on the Hill Parish Council believe the relevant policies include:

Overarching National Policy Statement for Energy (EN-1) 2023

5.11.12 Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).

5.11.34 he Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

Central Lincolnshire Local Plan (2023), Policy 67 **(not mentioned in the scoping document)**

Policy S67: Best and Most Versatile Agricultural Land Proposals should protect the best and most versatile agricultural land so as to protect opportunities for food production and the continuance of the agricultural economy. With the exception of allocated sites, significant development resulting in the loss of the best and most versatile agricultural land will only be supported if:

a) The need for the proposed development has been clearly established and there is insufficient low grade land available at that settlement (unless development of such low grade land would be inconsistent with other sustainability considerations); and

b) The benefits and/or sustainability considerations outweigh the need to protect such land, when taking into account the economic and other benefits of the best and most versatile agricultural land; and

c) The impacts of the proposal upon ongoing agricultural operations have been minimised through the use of appropriate design solutions; and

d) Where feasible, once any development which is supported has ceased its useful life the land will be restored to its former use (this condition will be secured by planning condition where appropriate). Where proposals are for sites of 1 hectare or larger, which would result in the loss of best and most versatile agricultural land, an agricultural land classification report should be submitted, setting out the justification for such a loss and how criterion b has been met.

Thorpe on the Hill Parish Council request that an Agricultural Land Classification Report should be submitted as part of the ES, setting out the justification for the loss of BMV land and how criterion b of Policy 67 has been met. As required under Central Lincolnshire Local Plan 2023, Policy 67.

ALTERNATIVES CONSIDERED

Thorpe on the Hill Parish Council consider Section 4 of the scoping report to be very limited in ambition. This is the relevant section.

4.1.5 The ES will include a description of the alternatives relevant to the Proposed Development that have been considered, including their specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. This will include alternative site layouts, which will be considered during the design process. A full detailed appraisal of the options considered will be presented as part of the ES, discussing the rationale for the final site layout and design selection, as well as explaining the flexibility sought within the consent in this regard.

Thorpe on the Hill Parish Council request that the ES contains a full comparative analysis of all alternative technologies that could be employed, including wind turbines.

SITE SELECTION

The very brief reference in the Environmental Impact Assessment Scoping Report to site selection is shown below. This, particularly 4.2.2, which indicated the application boundaries may change, severely limits the opportunity to respond at this stage.

4.2.1 The evaluation process for site selection explored a range of possible alternatives, considering key environmental, planning and access constraints, and including liaison with landowners. The reasons for selecting the site will be presented in the ES.

4.2.2 Further refinement will be undertaken as the Proposed Development design progresses to determine the DCO application boundaries and layout for the Site submitted with the DCO application.

Thorpe on the Hill Parish Council request the ES contains full details of other sites considered, particularly brown field sites and those not including a high proportion of BMV land, and full details of why those sites were considered less suitable.

ECOLOGY AND BIODIVERSITY

The extract below is from Section 9.7 of the Environmental Impact Assessment Scoping Report, listing items scoped out;

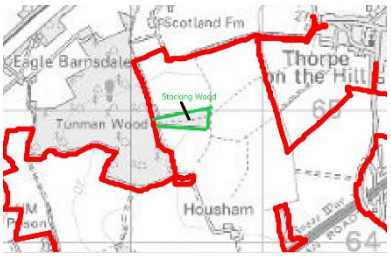
9.7.2 The following potential operational effects are scoped out of further assessment.

Attraction of birds to solar panels – there is no evidence from operational solar Proposed Developments in the UK that the solar panels attract congregations of birds, which may lead to displacement of populations and increase the risk of mortality (through collision with solar panels and infrastructure). In addition, the Proposed Development is not located near areas, such as wetlands, which support large congregations of birds, nor is the Proposed Development located on a migratory flyway or on a flightpath between areas supporting congregations of birds. As such this potential impact pathway is scoped out of further assessment.

The proposed development is not near wetlands, but it is very close to many lakes (former gravel workings), the Whisby Nature reserve, and the Eric East Memorial Lake, an environmental 'lung' for residents, all well populated with water birds. While recognising that the evidence that large numbers of bird deaths are caused by mistaking solar panels for water is not well established, the council still feel this issue should not be simply be scoped out.

Thorpe on the Hill Parish Council request that the impact on birds, particularly water birds, is not scoped out of the ES.

Stocking Wood has not been listed in the Environmental Impact Assessment Scoping Report as a non-statutory site and has been included within the site boundary. Stocking Wood is a small wood, extending out to the East from Tunman Wood. It appears to have been overlooked by the developers and included within the development boundary.



Thorpe on the Hill Parish Council request that Stocking Wood be listed as a non-statutory site and, as such, the site boundary be redrawn to exclude Stocking Wood.

There is also a significant small belt of woodland located alongside to the north of the A46 in the vicinity of the radio/telephone mast included within the site boundary. There are further small, but significant patches of woodland (e.g. to the east of Morton Grange and Ash Holt (North-east of Halfway Houses) within Thorpe on the Hill Parish. Moreover, some verges of public highways and hedgerows within the area have trees and these should be protected against removal.

Thorpe on the Hill Parish Council request that the A46 woodland belt and other woodland as listed above should be identified and included in the ES. It is further requested that trees and hedges along highway verges and field hedgerows should also be identified and included in the ES.

BATTERY SAFETY

The Environmental Impact Assessment Scoping Report is almost dismissive of any potential hazards associated with placing an estimated 192 batteries, each 6.5m by 2.5m by 3m in proximity to residential housing. It reads as if the technology to control any risk is proven and well established. This view is contradicted by reports such as Safety of Grid Scale Lithium-Ion Battery Energy Storage Systems by Professors Edmund John Fordham, Energetics Research and Consulting Limited, and Wade William Magill Allison, University of Oxford. Consequently, there is no indication that the risk to life, if a fire or explosion were to occur, will be assessed.

These are relevant extracts from the scooping report.

Fire Local residents, habitats and species. There may be some potential for fire as a result of the battery storage element. However, the battery energy storage system will include cooling systems, which are designed to regulate temperatures to within safe conditions to minimise the risk of fire

While impacts are expected as a result of projected temperature increases (due to climate change), these temperature increases are not expected to have a significant impact on the Proposed Development. It is anticipated that the cooling systems for the battery energy storage systems, will regulate temperatures to within safe conditions.

There may be some potential for fire because of the battery storage element of the Proposed Development. However, the battery energy storage system will include cooling systems, which are designed to regulate temperatures to within safe conditions to minimise the risk of fire. In addition, the Proposed Development design will include adequate separation between battery banks to ensure that an isolated fire would not become widespread and lead to a major incident. Fire detection and suppression features would be installed to detect (e.g. multi-spectrum infrared flame detectors) and suppress fire (e.g. water base suppression systems) to minimise the effect of any fire.

Thorpe on the Hill Parish Council request that a full assessment of the potential hazards and risk to life of placing an estimated 192 batteries, each 6.5m by 2.5m by 3m in proximity to residential housing be included in the ES. This should include a full impact assessment of a fire and explosion, not just a dismissal of these events as unlikely to happen. This assessment should take note that the UK's record temperature, 40.3 degrees centigrade, was recorded within 35 km of the proposed site, and predictions that Europe's climate is highly likely to face further increases in record temperatures.

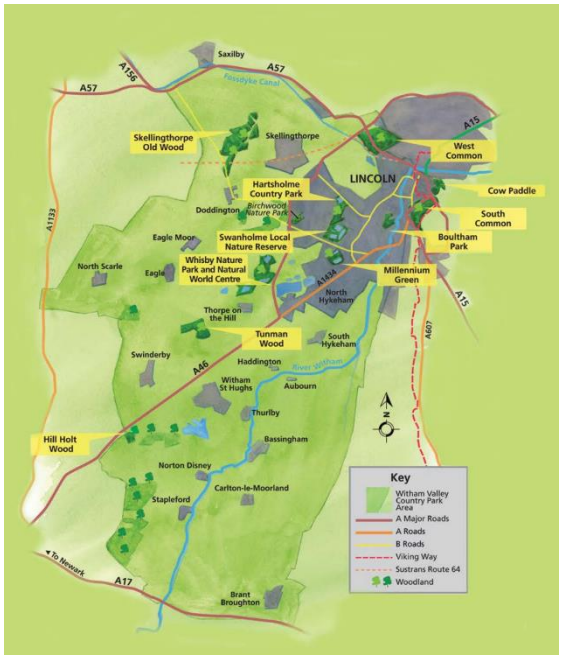
WITHAM VALLEY COUNTRY PARK

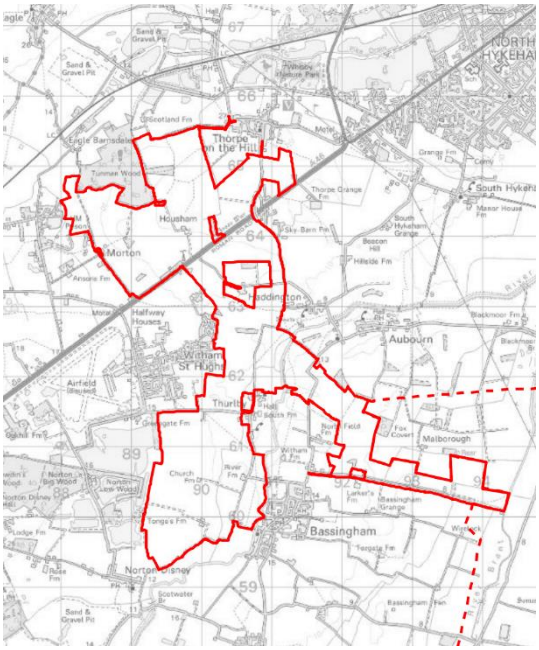
There is no mention in the scoping document of Whitham Valley Country Park

Connecting a variety of public green spaces in the heart of Lincolnshire, Witham Valley Country Park covers around 40 square miles of high quality, unspoilt countryside, rich in wildlife and history.

The concept of WVCP came out of a partnership between City of Lincoln Council, Lincolnshire County Council, North Kesteven District Council, West Lindsey District Council, Natural England, the Environment Agency and the Lincolnshire Wildlife Trust. In creating a single, marketable identity the idea is to encourage more people to explore the green spaces in that part of Lincolnshire, especially the less well-known ones.

Witham Valley Country Park is promoted by the City of Lincon Council, Visit Lincoln, North Kesteven District Council, and the Greater Lincolnshire Nature Partnership as a significant tourist attraction, an amenity for residents, and a sanctuary for wildlife.





Thorpe on the Hill Parish Council notes that no reference to Witham Valley Country Park is made in the scoping document. We request that the importance of the park is acknowledged in the ES. We further request that a full assessment of the environmental and socio-economic impact of placing a large solar farm in the centre of the park is included in the ES.

VISUAL IMPACT

We consider that Section 11.2 of the scoping report is complete inadequate in the limits it places on the LVIA.

1.2.3 Based on the desk based review undertaken to date, and the fieldwork undertaken in April 2023, the extent of visibility of the Proposed Development will vary in different directions, dependent on surrounding landform, woodland, field boundaries, roadside vegetation and built features. The preliminary study area relating to the Solar and Energy Storage Park therefore extends up to 2km from its boundary to cover:

• Land between Swinderby, Eagle and North Hykeham in the north; and Fosse Green Energy EIA Scoping Report June 2023 Prepared for: Fosse Green Energy Ltd AECOM 138

• Land between Stapleford, Carlton le Moorland and South Hykeham in the south.

11.2.4 Although the Proposed Development may be visible beyond 2km, it is unlikely to result in any notable change to people's views given the intervening distance, vegetation, built form and overall visibility.

11.2.5 The study area will also cover land up to 500m from the potential connection corridors. In the event that the option of an overhead line, as set out in Section 3, forms part of the Proposed Development, the study area will be increased through consultation with LPAs to an extent defined by the potential for the overhead lines and associated infrastructure to have significant effects on landscape character and visual amenity.

11.2.6 The extent of the LVIA study area will be reviewed throughout the iterative design process, informed by ongoing desk based research and field based analysis during winter and summer

conditions, to account for when deciduous vegetation is not in leaf. The extent of the LVIA study area will be consulted upon with the LPAs and the justification for its final extent provided in the ES.

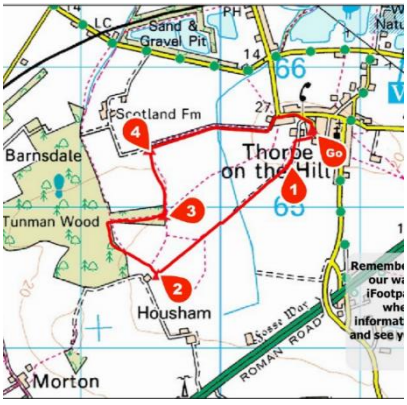
The Cliff Villages are in a locally designated Area of Great Landscape Value. Regarding the local landscape character, consideration should be given to the Natural England publication 'National Character Area Profile: 47 Southern Lincolnshire Edge.' The local landscape is characteristically open with gently undulating topography. Longer distance vistas across arable field systems sporadically delineated with low hedgerows and drystone walls are typical.

The proposed Fosse Green site can be clearly viewed from the limestone ridge and cliff villages. This escarpment encompasses the designated Lincoln Cliff Landscape Character Area. On sunny days, the visual impact may well be greatly magnified by glint and glare from the panels.

Thorpe on the Hill Parish Council requests that the scope of the LVIA be extended to cover views from the limestone ridge and the cliff villages, with full consideration of both normal visual impact and the enhanced impact created by glint and glare from the panels.

STEPPING OUT ROUTE

Thorpe on the Hill is the start and finish of a North Kesteven District Council Stepping Out Route, described as a 3 mile (4.5km) circular walk from the village of Thorpe on the Hill near Lincoln in Lincolnshire, shown below. This route, very well used by residents and visitors, is almost entirely within the proposed solar farm.



This statement is from the NKDC website.

Open spaces are hugely important and valuable assets, and are proven to improve public health, wellbeing and quality of life. They make our communities enjoyable places to live, work and visit, and provide opportunities for all people to engage in healthy and active lifestyles.

High quality and accessible open spaces are essential to the success of our existing Sport and Physical Activity Strategy and Cycling Strategy, and we aim to use these strategies to deliver our ambition of a healthy, fit and vibrant district.

The leaflet for the walk is available from NKDC (Stepping Out Thorpe on the Hill (hillholtwood.co.uk)) and contains a series of images of the views that walkers will experience. Part of the purpose of the ES is surely to give planners, residents, and ramblers' groups clear information about the visual impact the solar farm will have on vital recreational walks.

Thorpe on the Hill Parish Council request that, to allow consultees to fully appreciate the visual impact the solar farm will have on local walking routes, the Thorpe on the Hill Steeping out Leaflet is reproduced, replacing the current images with artist impressions of the views available once the farm is constructed.

There are a significant number of other public right of way, footpaths and bridleways, within the proposed solar farm boundaries. These are shown on a map in the scoping report, but the only written reference to these rights of way is as follows.

Traffic and Transport

2.2.10 The northern part of the Solar and Energy Storage Park intersects the A46. The Solar and Energy Storage Park crosses several Public Right of Ways (PRoW), comprising bridleways, footpaths and a byway. The PRoWs are located primarily in proximity to Thorpe on the Hill and along the River Witham

Currently, these are largely pleasant country walks or rides. They are essential to public wellbeing and were a major benefit to the area during the pandemic. The parish council can find no reference in the scoping document as to how these essential recreational amenities will be protected should the development go ahead.

Thorpe on the Hill Parish Council request that the ES contains an assessment of the aesthetic impact on public footpaths and bridleways within the boundaries, should the development be completed, and recognises the need to protect these vital public amenities.

NEIGHBOURHOOD PLAN

The scoping document makes a very brief reference to Thorpe on the Hill Neighbourhood Plan

11.3.11 The LVIA will also have regard to the following neighbourhood plans:

•Thorpe on the Hill (Made Plan), noting Policy 5: Landscape and Views (Ref. 84);

The Neighbourhood Plan contains an appendix of ten images, describes as:

The Parish Council considers the views identified in the publication Views from the Hill (100th Edition) to be the most distinctive within the Parish and worthy of protection from inappropriate development that would significantly alter these. A description of the views is provided below and is supported with photographs. The location and direction of the views are shown on Map 5 of this Neighbourhood Plan.

Thorpe on the Hill Parish Council requests that the ES clarifies what the phrase 'have regard to' (11.3.11 of the scoping document) means in practice in relation to the ten protected views recorded in the Neighbourhood Plan. The Council further requests that artists impressions are included in the ES showing the likely impact on these views should the development be completed.

GREATER LINCOLNSHIRE LOCAL ENTERPRISE PARTNERSHIP

The scoping report is very selective in its references to the Greater Lincolnshire Enterprise Partnership, referring only to Industrial strategy and not agricultural strategy, reflected in the fact that the agri-food sector is a top priority for the GLLEP.

Regional Planning Policy • Greater Lincolnshire Local Enterprise Partnership Local Industrial Strategy (Ref. 208) with reference to aspirations to pioneer the industrial decarbonisation sector, building upon local industrial specialisms. Reference is also made to employment and skills ambitions.

This statement is from the enterprise partnership website.

The agri-food sector combines agriculture and food manufacturing with a strong focus on agri-tech (robotics) and the supply chain. Greater Lincolnshire has an international reputation for food, fish, and farming and has one of the largest concentrations of food manufacturing, research, storage and distribution areas in Europe.

Our region is responsible for growing 30% of the nation's vegetables and producing 18% of the poultry, with a total agricultural output of over £2bn in 2019, representing 12% of England's total production. This strength in agriculture is replicated in food processing, with the UK's largest fish processing cluster located on the Humber, the centre of the UK's fresh produce industry in South Lincolnshire and major arable, poultry and meat processors spread right across the area.

In total the food chain provides 24% of jobs throughout Greater Lincolnshire (as compared with just 13% nationally) and 21% of its economic output (7% nationally).

The future of the food chain is therefore absolutely vital to Lincolnshire and its population, and we are strategically important to national food security.

Boasting more Grade 1 agricultural land than any other LEP in England, the Greater Lincolnshire agri-food sector will double its contribution to the economy by 2030 through an ambitious programme of investment in productive capacity, skills and knowledge to drive an increase in high- value- added sales to UK and export markets.

Thorpe on the Hill Parish Council requests that the ES contains a full consideration of the impact the loss of 2,500 acres of BMV land will have on the GLLEP agri-food priority and further, that this impact assessment be set in the context of the cumulative land loss effect of other solar farms proposed in the area.

MINISTRY OF DEFENCE FACILITIES

There are several MOD facilities within 10 miles of the development, some of a highly sensitive nature. There is clearly a potential for the development to impact upon the operation of these facilities.

Thorpe on the Hill Parish Council request that a summary of a full consultation with the Ministry of Defence be included in the ES.

Response of Wellingore Parish Council to Fosse Green Park EIA Scoping Report

The report has been considered and the following summarises a number of observations that have not been adequately addressed in this report and that should be brought to your attention. Some of these matters are of a social and economic nature as well as of environmental concern as the matters are inextricably linked and should not be considered in isolation.

The Parish Council takes a more holistic view of the issues and implications of this proposal and report, such that the residents that may be affected by the proposed development are adequately represented. Such matters as are particularly relevant to the population and landscape should be scoped in for thoughtful analysis in addition to the consideration of the myriad of environmental statutes in isolation of the real effects on real people.

1 - The report does not deal in any detail with the loss of agricultural land. It is not true to say that the land is of limited agricultural productivity. Indeed, it has supported farming, farming families and the fabric of society in this area for centuries. The versatile land is capable of growing a wide range of agricultural crops and has done so, including potatoes and sugar beet with the proximity of the sugar processing factory at Newark being advantageous to production of this crop. The proposal would lead to an annual loss of agricultural output in the order of £2m. A full analysis of the land use should be scoped in and we are alarmed to see that this was scoped out in the recent Springwell application.

2 - Scoping of land use should include the effect of the loss of agricultural activity leading to the loss of jobs in the area, both those of farm workers and of tenant farmers and of those whose industry rely on the provision of inputs to the farming sector. This should be assessed in detail, including land quality and classification.

3 - It appears that tenants on agricultural holdings may lose part of their land and as a result could find themselves with unviable holdings and may lose not just their business but their house and their livelihood and security into retirement. The number of tenants and the effect on their livelihoods and businesses should be considered.

4 - The proposed development is simply massive. It is correct to support solar energy in sensible and rational areas of perhaps 200 acres. A scheme of this nature being nearly 15 times that scale is simply a dramatic and disproportionate change of landscape leading to a substantial change in the nature of the social fabric and environmental features of the affected land. Analysis of these implications and the cumulative effect of a large number of these types of proposal should be scoped in.

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5 -The report also fails to recognise that due to the topography of the land and the proximity of the unique Lincoln limestone escarpment to the east, that this site is highly visible and will have influence over a far greater area than prescriptively described. The proximity of the previously designated AONB is neither noted nor discussed. The visual aspects of the development should be scoped noting the visual intrusion from the neighbouring escarpment together with glint and glare of both static and oscillating panels.

6 - The value of residential property both surrounded and visually impacted by the development must be considered. This was scoped out of the Springwell application which is wrong and unjust – the many occupants deserve a fair consideration of the effects of this proposed development on property values as well as quality of living as well as local and visual amenities. It is hard to countenance a reduction of residential value of many properties in the vicinity being of less than 10%. It is easy to countenance a reduction in value of a significant property surrounded by this development in the order of 30%. This will be of significant concern to residents and the local economy. The apparent disregard of this single issue and the apparent lack of consultation to date and as noted for the Springwell site leads to a reminder to the applicant to seek to ensure compliance with the Gunning Principles of effective consultation. Residential property should be scoped in and considered in some considerable detail.

7 - The report nowhere proves any need for the development. Rather, this appears a rather opportunist feast of development on the back of an unregulated planning system for which there is no design or measure of need leading to unforeseen consequences. It is, in fact telling, that this site requires access to the 400Kv distribution network via a new sub station to be specially constructed, suggesting that there is no proven local need for the power generated. Better by far to site generation close to existing HT connections such as adjacent to redundant power stations and on brown field sites. Also, at small scale on all new roofs of houses and buildings supplementing existing domestic demand with production at point of usage.

8 – The scoping is inadequate to the point of disingenuous on grid connection. To merely state that there are three possible routes to grid connection suggests that the application is not yet fit for submission. Further, such grid connection is dependent upon the Springwell development and the construction of a new substation – this is far from pre-determined nor is it necessary or desirable, nor is there any proven need. Better by far to utilise existing grid connections without construction of additional unnecessary infrastructure. This matter requires further detail to be made available and subject to scrutiny.

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9 - The nature of the investment is huge being in excess of 0.35 billion pounds making it disproportionate to the local economy. The size of the development should be considered in context of the large number of similar developments overwhelming the area. This is due to the available capacity on the 400Kv transmission network and not for any justifiable local need – indeed there is widespread environmental, rural and amenity damage being proposed for no valid or other determined reason.

10 - There is no consideration of alternatives. On shore wind turbines could generate a similar output of electricity and occupy just three hectares of land. Substantial investment in offshore turbine capacity mitigates the need for large scale solar installations. Further, solar power production is singularly mis-matched to usage, producing very little in the winter. Scoping should include analysis of alternative power generation and usage data, particularly as there is no local need or connection. Such scoping should also include land use for energy crops and availability of sites of lesser land quality.

11 - The above leads to concerns about decommissioning. The site does not propose a time limited period of operation. However, a bond should be taken by the local authority in respect of decommissioning costs. The risk is that eventually the operator walks away from thousands of acres of redundant panels, twisted and useless mounting rails, rotting fencing and redundant cabling, leaving an all too familiar scene of industrial dereliction.

12 - The biodiversity net gain (BNG) of the project is not adequately dealt with, nor is the construction of the site such as to enhance the landscape for deer, hare and other species of animal and bird as may otherwise proliferate. Fenced areas create corridors trapping deer, hare and hunting owls at the mercy of road traffic. There will be significant change to flora and fauna under this massive extent of panelling. This change in habitat, food supply and breeding cycles should be scoped in.

13 - Amenity use of land also supports hospitality and other rural jobs and vocations. Cyclists and walkers will not abound to walk amongst 3m high panels and fenced footpaths, roadways and tracks. The likely effect on use of the area by such user groups should be scoped in.

14 - There is no mention of CIL or any form of social payback by the developer to the local social fabric, schools, educational trusts and funds or local churches, playgroups or similar.

The above are some initial thoughts on what has been put forward. We look forward to seeing these discussed and debated further and to reading, in due course, the input of other concerned residents, councils and other stakeholders in the vicinity.

Response of Wellingore Parish Council to Fosse Green Park EIA Scoping Report

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Ian Elliott
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[redacted]

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

4th July 2023

Dear Sir/Madam

APPLICATION REFERENCE NO: 146954

PROPOSAL: PINS consultation on behalf of the Secretary of State for its opinion (a scoping Opinion) as to the information to be provided in an Environmental Statement - EN010154

LOCATION: Fosse Green Energy

Thank you for identifying West Lindsey District Council as a consultation body and advising that the Secretary of State will be preparing a Scoping Opinion on the information to be provided in an environmental statement (ES). As the case officer I have read through the Environmental Impact Assessment Scoping Report (SR) by Fosse Green Energy Limited dated 26th June 2023 with Section 3 of the SR describing the proposed development. Overall I consider the SR to be well written and with good content.

Planning Policy Context

The siting of the solar and battery energy storage would be a good distance (between 4 to 7.5 miles) outside the West Lindsey District boundary, the statutory development plan for the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 comprises the adopted plan is the Central Lincolnshire Local Plan 2023 (CLLP). This is the same development plan used by West Lindsey District Council.

The Environmental Statement should consider National Planning Policy and Guidance as follows:

- National Planning Policy Framework (NPPF);
- National Planning Practice Guidance (to include):

  - Climate Change
  - Historic Environment
  - Environmental Impact Assessment
  - Air Quality
  - Light Pollution
  - Healthy and Safe Communities
  - Natural Environment including a 10% Net Biodiversity Gain
  - Noise and Vibration

- Renewable and Low Carbon Energy
- Travel Plans, Transport Assessments and Statements
- Water Supply, Wastewater and Water Quality

- National Design Guide 2019
- National Design Model Code 2021
- EN-1 Overarching National Policy Statement for Energy
- EN-3 National Policy Statement for Renewable Energy Infrastructure
- EN-5 Electricity Networks National Policy Statement

It is understood that EN-1, EN-3 and EN-5 statements are currently under review to revise energy National Policy Statements. Any new adopted statements to replace EN-1, EN-3 and EN-5 must be considered.

Landscape and Visual Impact:
The Landscape and Visual Impact Assessment (LVIA) should follow the guidance of the Landscape Institute "Guidelines for Landscape and Visual Impact Assessment 3rd Edition (2013), as proposed. An iterative approach, which guides the layout and scheme design should be followed.

Section 11 of the SR sets out a proposed structure for the Environmental Statement. This appears to be reasonable and acceptable.

The location of the proposed solar and battery storage would be approximately 4 to 7.5 miles from the nearest shared North Kesteven and West Lindsey district boundary. According to the SR the scale of the development in terms of height appears to be generally no more than 3.5 metres with the single substation 13 metres high and the potential overhead lines being a maximum of 50 metres high. The City of Lincoln, North Hykeham and other small, medium and large settlements would sit between the site and the district of West Lindsey. This is more limited to the north west of Thorpe on the Hill but areas of grouped trees sit between this part of the site and the West Lindsey District. It would therefore be highly unlikely to be clearly in view from any parts of the West Lindsey District. Therefore it is not considered likely that any viewpoints from West Lindsey are necessary and no residential properties in West Lindsey would be affected. It would be welcomed if the Environment Report provided detail on any use and impact on the highway network in West Lindsey.

Yours faithfully

Ian Elliott
Senior Development Management Officer
On behalf of West Lindsey District Council

If you want to know more about how we use your data, what your rights are and how to contact us if you have any concerns, please read our privacy notice:
www.west-lindsey.gov.uk/planning-privacy

If you require this letter in another format e.g. large print, please contact Customer Services on 01427 676676, by email

customer.services@west-lindsey.gov.uk or by asking any of the Customer Services staff.

From: [redacted]
To: Fosse Green Energy
Date: 13 July 2023 16:29:58
Attachments: image001.png

Our ref UD-6513-2023-PLN
EIA scoping Report :Fosse Green Energy
Ref EN010154 - 20 June 2023

Thank you for the opportunity to comment on the above application. The proposal lies within the Upper Witham Internal Drainage Board district and extended area. The grid connection corridor options lie within the extended area of Witham First District Internal Drainage Board.
Any sites within the area highlighted in the report could potentially be adjacent to both Internal Drainage Board and Environment Agency water courses. Works adjacent to EA main river water course may require an environment permit from the EA.

While the supplied Environmental Impact Assessment Scoping Report states minimum offset distances for any proposed construction relative to varying landscape and ecological features in section 3.2.40 / Table 3.1 (Pg 23), it is worth noting that current Byelaws relating to IDB water courses state a minimum clear distance of 9m should be maintained ‘from the top of the watercourse bank’ (rather than the watercourse centreline).

It is noted that potential development could be located within flood plain (Zones 2 and 3 of the Environment Agency flood map) and that any critical infrastructure should be located above the design flood level.

Within the Board’s district for ordinary watercourses under the terms of the Land Drainage Act. 1991 the prior written consent of the Board is required for any proposed temporary or permanent works or structures within any watercourse including infilling or a diversion. It is recommended that an access of appropriate width is left adjacent to all watercourse to allow for mechanical maintenance.

Within Lincolnshire under the provisions of the Flood and Water Management Act 2010, and the Land Drainage Act. 1991, the prior written consent of the Lead Local Flood Authority (Lincolnshire County Council) is required for any proposed works or structures in any watercourse outside those designated main rivers and Internal Drainage Districts. Within the catchment draining to the Board’s area (extended area) of Upper Witham and Witham First District Internal drainage Board acts as Agents for the Lead Local Flood Authority and as such any works, permanent or temporary, in any ditch, dyke or other such watercourse will require consent from the Board.

Should you require further information relating to IDB water courses, we can provide mapping in the form of Jpeg or G.I.S. shape files.

Mark Ketley

Project Engineer

Witham First District Internal Drainage Board
Witham Third District Internal Drainage Board
Upper Witham Internal Drainage Board
North East Lindsey Drainage Board

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