



Fosse Green Energy

EN010154

8.6 Statement of Common Ground with the Lincolnshire Wildlife Trust

VOLUME

8

Planning Act 2008 (as amended)

Regulation 8(1)(e)

Infrastructure Planning (Examination Procedure)

Rules 2010

24 March 2026

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

Fosse Green Energy Development Consent Order 202[]

8.6 Statement of Common Ground with the Lincolnshire Wildlife Trust

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1. Statement of Common Ground Signatures

This Statement of Common Ground has been prepared and agreed by Fosse Green Energy Limited and Lincolnshire Wildlife Trust.

Signed on behalf of Fosse Green Energy Limited

Name: Lloyd Sandles

Position: Director

Date: 23/03/2026

Signature

Signed on behalf of Lincolnshire Wildlife Trust

Name:

Position: Conservation Officer

Date: 20/03/2026

Signature:

2. Introduction

2.1 Purpose of this document

- 2.1.1 This Statement of Common Ground (SoCG) relates to the application submitted to the Planning Inspectorate on 18 July 2025 (the Application) by Fosse Green Energy Limited (the Applicant) for a Development Consent Order (DCO) for the Fosse Green Energy solar project (the Proposed Development).
- 2.1.2 This SoCG has been prepared by the Applicant and Lincolnshire Wildlife Trust (together “the Parties”) in respect of the Proposed Development.
- 2.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the Parties and where agreement has not yet been reached. This SoCG will be revised and updated as appropriate and/or required by the ExA at relevant examination deadlines.
- 2.1.4 In particular, this SoCG focuses on:
- The interaction between the Proposed Development and local ecological receptors; and
 - The methodology and results of the Biodiversity Net Gain assessment.
- 2.1.5 As set out in the procedural decision made by the ExA on 22 August 2025 **[PD-005]**, the ExA requires final and signed SoCGs to be submitted at the midpoint of examination. In line with the Examination Timetable set out at Annex A to the Rule 8 Letter **[PD-010]**, this is Deadline 3A (24 March 2026). Further to this, procedural decisions dated 21 November 2025 **[PD-007]** includes the Lincolnshire Wildlife Trust as a party with which the Applicant must enter into a SoCG.
- 2.1.6 Application document references are taken from the EN010154 – Fosse Green Energy Examination Library.

2.2 The Proposed Development

- 2.2.1 The Application is for the construction, operation (including maintenance), and decommissioning of a ground-mounted solar photovoltaic (PV) electricity generating station with a capacity exceeding 50 megawatts, with battery storage, onsite substation, and associated infrastructure to generate and export/import electricity. The associated development includes, but is not limited to, access provision, battery storage, underground cabling, areas of landscaping and biodiversity enhancement, and a 400 kV underground Grid Connection Cable to connect the Proposed Development to the national electricity transmission network.
- 2.2.2 The Proposed Development will provide a significant amount of renewable energy over its 60-year operational lifetime supporting resilience, security and affordability of electricity supplies. It would be a critical part of the national portfolio of renewable energy generation that is required to decarbonise the UK’s energy supply quickly.

2.2.3 The Proposed Development will help meet the urgent need for this infrastructure to support “energy objectives, together with the national security, economic, commercial, and net zero benefits” as set out in the Overarching National Policy Statement for energy (NPS EN-1) (Ref 1). As such it is defined as infrastructure of critical national priority.

2.3 Parties to this Statement of Common Ground

2.3.1 The Parties have been, and continue to be, in direct communication in respect of the Proposed Development.

2.3.2 Lincolnshire Wildlife Trust, founded in 1948, is a voluntary charitable organisation which looks after Lincolnshire's wildlife and countryside throughout the county from the Humber to the Wash. It is one of 46 Wildlife Trusts across the UK which are affiliated to the Royal Society of Wildlife Trusts.

2.3.3 The Applicant is a partnership between Windel Energy Limited and Recurrent Energy.

2.3.4 Founded in 2018, Windel Energy is a privately held company dedicated to driving the transition towards a sustainable future. Specialising in the origination, development and integration of renewable energy projects and low-carbon disruptive technologies, Windel Energy is at the forefront of clean energy innovation.

2.3.5 With a portfolio exceeding 5 gigawatts of renewable power in various stages of development, Windel's team of talented professionals bring a deep understanding and high level of expertise in land viability, electricity networks, planning (Town and Country Planning Act 1990, Developments of National Significance) and consenting for Nationally Significant Infrastructure Projects, legal processes and construction feasibility.

2.3.6 Windel Energy adopt a long-term ownership approach, ensuring the efficient operation and management of renewable assets. Leveraging an extensive network of relationships, institutional grade infrastructure and in-house industry expertise, Windel is committed to delivering impactful and enduring energy solutions.

2.3.7 Recurrent Energy, a subsidiary of Canadian Solar Inc, is one of the world's largest and most geographically diversified utility-scale solar and energy storage project development, ownership, and operations platforms. With an industry-leading team of in-house energy experts, Recurrent Energy serves as Canadian Solar's global development and power services business.

2.3.8 To date, Recurrent Energy has successfully developed, built, and connected 12 GWp of solar projects and more than 5 GWh of energy storage projects across six continents. As of September 30, 2025, its global pipeline includes approximately 23 GWp of solar power and 73 GWh of energy storage capacity. The company also has over 14 GW of solar and energy storage projects under operations and maintenance (O&M) contracts.

2.4 Terminology

2.4.1 In the tables in Section 3 of this SoCG, “Matters agreed, not agreed or under discussion” are categorised as follows:

- a. “Agreed” (green) indicates where the issue has been resolved;
- b. “Not Agreed” (red) indicates a final position that a matter cannot be agreed; and
- c. “Under discussion” (amber) indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

3. Record of Engagement

3.1 Summary of consultation

3.1.1 A summary of the meetings and correspondence that has occurred between the Applicant and Lincolnshire Wildlife Trust is set out in **Table 3-1**.

Table 3-1 Engagement between the Applicant and Lincolnshire Wildlife Trust

Date	Form of Correspondence	Details
27/09/2024	Email	Lincolnshire Wildlife Trust requested a meeting with the Applicant to discuss Tunman Wood Local Wildlife Site and the adjacent land holding.
01/10/2024	Email	Correspondence with regards to setting a date for a meeting.
02/10/2024	Email	A meeting was arranged for 10/10/2024.
10/10/2024	Meeting – MS Teams	A meeting was held with the Project Team for the Proposed Development and Lincolnshire Wildlife Trust to discuss Tunman Wood and adjacent land holding and the potential environmental impacts of the Proposed Development.
21/10/2024	Email	Statutory notification under Section 42 of the Planning Act 2008 issued by the Applicant to the Lincolnshire Wildlife Trust for the launch of statutory consultation.
02/11/2024	Email	Response to statutory consultation was provided by the Lincolnshire Wildlife Trust.
23/01/2025	Meeting – MS Teams	The Applicant provided a progress update and consultation comments from December 2024 were discussed. Discussion of ecological surveys, biodiversity net gain (BNG), and Lincolnshire Wildlife Trust solar guidance.
03/02/2025	Meeting – MS Teams	A progress update and a run through of comments received during statutory consultation were provided. Other matters discussed included BNG commitments, the Lincolnshire Recovery Strategy and Tier 3 Environmental Land Management.
20/06/2025	Email	The Applicant issued a letter via email containing the Potential Main Issues for Examination (PMIE).

Date	Form of Correspondence	Details
01/07/2025	Email	Lincolnshire Wildlife Trust confirmed receipt of the PMIE and agreed with the status of potential issues. No further issues or queries were raised.
17/09/2025	Email / Letter	Notice under Section 56 of the Planning Act 2008 issued by the Applicant to Lincolnshire Wildlife Trust.
21/10/2025	Relevant Representation	Lincolnshire Wildlife Trust submitted a relevant representation to the Planning Inspectorate.
22/12/2025	Email	The Applicant issued the first Draft Statement of Common Ground for comment.
12/02/2026	Email	Lincolnshire Wildlife Trust issued a copy of the first Draft Statement of Common Ground with Lincolnshire Wildlife Trust's comments / revisions.
11/03/2026	Email	The Applicant issued a second Draft Statement of Common Ground amended in response to Lincolnshire Wildlife Trust's comments.
19/03/2026	Email	Lincolnshire Wildlife Trust issued an email with comments on the second Draft Statement of Common Ground.

4. Matters agreed, not agreed or under discussion

4.1 Ecology and Nature Conservation

Table 4-1 Ecology and Nature Conservation

Reference	Description of Matter	Lincolnshire Wildlife Trust Position	Applicant Position	Status
Legislation and Policy				
4.1.1	Ecology and Nature Conservation Legislation and Policy	Lincolnshire Wildlife Trust (LWT) agree that applicable legislation and policy have been considered.	The Applicant considers that Chapter 8: Ecology and Nature Conservation of the ES [APP-033] has identified and appropriately considered all applicable legislation and policy.	Agreed
Methodology				
4.1.2	Ecology and Nature Conservation Methodology	LWT agree in principle with the methodology adopted within Chapter 8: Ecology and Nature Conservation of the ES [APP-033]	The methodology adopted within Chapter 8: Ecology and Nature Conservation of the ES [APP-033] is considered acceptable.	Agreed
Baseline				
4.1.3	Ecology and Nature Conservation Baseline	LWT agree that the detailed baseline conditions are representative of the site conditions.	The baseline conditions which are detailed in Chapter 8: Ecology and Nature Conservation of the ES [APP-033] are representative of the baseline conditions of the DCO site.	Agreed

Reference	Description of Matter	Lincolnshire Wildlife Trust Position	Applicant Position	Status
Assessment Results				
4.1.4	Ecology and Nature Conservation Assessment Results	LWT agree with the presented assessment results, including likely significant effects anticipated.	The assessment results set out within Chapter 8: Ecology and Nature Conservation of the ES [APP-033] , including likely significant effects anticipated, are acceptable.	Agreed
4.1.5	Proximity and potential for impacts on Tunman Wood Lincolnshire Wildlife Trust (LWT) Reserve and Local Nature Reserve (LNR).	Concerns regarding the proximity of the Proposed Development to (and impacts on) Tunman Wood (LWT Reserve and LWS). Formal responses regarding this issue where submitted at Deadline 2. LWT are satisfied that a minimum offset of 15m from woodlands will be observed, and that there will be tree and shrub planting throughout the site and are supportive of the proposed natural regeneration buffer proposed. LWT consider that the proposed annual inspection of the buffer areas should determine whether any floral Invasive Non-native Species (INNS), such as rhododendron, are present, in which case, a robust management approach should be employed.	There will be a minimum 15 m buffer from Tunman Wood to the Proposed Development in accordance with the buffer zones set out in the British Standard Recommendations BS 5837:2012. The Applicant has amended the Framework Landscape and Ecological Management Plan [REP2-021] to secure a 15m to 30m wide natural regeneration buffer bordering Tunman Wood and Housham Wood. The buffer zones will provide protection and allow regeneration of the woodland edge to provide additional habitat and linkages. Further information on the function, implementation and long-term management (including of Invasive Non-Native Species) of this natural regeneration buffer will be detailed in the revised Framework LEMP and the Applicant's Responses to IP Deadline 2 Submissions to be submitted to the Examination at	Agreed

Reference	Description of Matter	Lincolnshire Wildlife Trust Position	Applicant Position	Status
			<p>Deadline 3. Further information on the function, implementation and long-term management (including of Invasive Non-Native Species) of this natural regeneration buffer is detailed in the revised Framework LEMP and the Applicant's Responses to IP Deadline 2 Submissions submitted to the Examination at Deadline 3.</p>	
4.1.6	<p>Impacts on ground nesting birds (including cumulative impacts)</p>	<p>Concern regarding impacts on ground nesting birds. Lincolnshire Wildlife Trust recommend that all grassland areas are utilised but are satisfied that a minimum of 64 hectares of grassland will be provided for mitigation.</p>	<p>The mitigation relating to ground nesting birds can be found in the Framework Landscape and Ecological Management Plan (LEMP) [REP2-021] which states in Section 5.2, "<i>Managed arable land would be provided within the areas of the DCO Site where there is no solar PV infrastructure to benefit ground nesting birds. These areas are indicatively illustrated as Arable fields A to F on Figure 8-5 Bird Mitigation Land Allocation of the ES [APP-081]. These would provide habitat for important ground nesting birds such as Skylark and Lapwing</i>".</p> <p>Further detail on the proposed mitigation relating to ground nesting birds is detailed in the revised Framework LEMP and the Applicant's Responses to IP Deadline 2</p>	Agreed

Reference	Description of Matter	Lincolnshire Wildlife Trust Position	Applicant Position	Status
			Submissions submitted to the Examination at Deadline 3.	
Mitigation / Management Plans				
4.1.7	Mitigation / Management Plans	LWT agree with the proposed mitigation detailed in Chapter 8: Ecology and Nature Conservation of the ES [APP-033] and the Framework CEMP [APP-189] , Framework OEMP [APP-190] , Framework DEMP [APP-191] , and Framework LEMP [AS-101] .	The proposed mitigation measures set out within Chapter 8: Ecology and Nature Conservation of the ES [APP-033] are acceptable. The measures secured within Section 3.4 of the Framework Construction Environmental Management Plan (CEMP) [REP2-013] , Section 3.4 of the Framework Operational Environmental Management Plan (OEMP) [REP2-015] , Section 3.4 of the Framework Decommissioning Environmental Management Plan (DEMP) [REP2-017] , and Section 5 of the Framework LEMP [REP2-021] are also considered acceptable. The provision of a detailed CEMP, a detailed OEMP, a detailed DEMP, and a detailed LEMP to be substantially in accordance with the respective frameworks, is secured under Requirements 12 (Construction Environmental Management Plan), 13 (Operational Environmental Management Plan), 20 (Decommissioning), and 8 (Landscape and Ecological Management	Agreed

Reference	Description of Matter	Lincolnshire Wildlife Trust Position	Applicant Position	Status
			Plan) respectively of the draft DCO [REP2-005] .	
4.1.8	Position of permissive paths at Tunman Wood and the creation of an ecotone of two habitats outside the boundary of Tunman Wood to promote biodiversity.	LWT agree with the measures proposed.	<p>The permissive paths around the edge of Tunman Wood that were shown on the layout plan at the Statutory Consultation stage have been removed.</p> <p>The Applicant has amended the Framework Landscape and Ecological Management Plan [REP2-021] to secure a 15m to 30m wide natural regeneration buffer bordering Tunman Wood and Housham Wood. The buffer zones will provide protection and allow regeneration of the woodland edge to provide additional habitat and linkages. Further information on the function, implementation and long-term management (including of Invasive Non-Native Species) of this natural regeneration buffer has been detailed in the revised Framework LEMP and the Applicant's Responses to IP Deadline 2 Submissions submitted to the Examination at Deadline 3.</p>	Agreed
4.1.9	Recommendation for modified grassland beneath solar arrays rather	LWT agree with the measures proposed.	Based on other solar Nationally Significant Infrastructure Projects (NSIPs) the target of modified grassland is more likely to be achieved between and under the panels.	Agreed

Reference	Description of Matter	Lincolnshire Wildlife Trust Position	Applicant Position	Status
	than species rich grassland		Opportunities exist in other open areas for targeting more species rich grassland. This is further detailed within the Framework LEMP [REP2-021] . Areas of grassland proposed beneath the panels are shown in Figure 7.15-1: Landscape Mitigation Plans .	
4.1.10	Habitat creation and enhancement	Concerns regarding habitat creation and enhancement. Formal responses regarding this issue will be submitted during Examination.	The principles of habitat creation, enhancement and management are set out in the Framework LEMP [REP2-021] . A detailed version of the LEMP substantially in accordance with the framework, is to be developed and identified measures will be secured by Requirement 8 (Landscape and Ecological Management Plan) of Schedule 2 of the Draft DCO [APP-016]	Agreed
4.1.11	Local Wildlife Site (LWS) Grass Verges	LWT issued comments with regard to soil reinstatement, re-seeding, and a request for evidence that the Proposed Development would not impact several other nearby LWS Grass Verges (including Boothby Graffoe Road Verge; High Dike, Coleby Mill to Harmston Verges; Gorse Lane; and Navenby Heath Road Verges). LWT are satisfied with the Applicant's proposed approach secured through the Framework SMP [REP1-037] , the	Further information on the protection and management of LWS Grass Verges has been detailed in the revised Framework LEMP and the Applicant's Responses to IP Deadline 2 Submissions to be submitted to the Examination at Deadline 3.	Agreed

Reference	Description of Matter	Lincolnshire Wildlife Trust Position	Applicant Position	Status
		Framework CEMP [REP2-013] and the Framework LEMP [REP2-021].		
4.1.12	Consultation on Management Plans	LWT wish to be a consultee on the detailed LEMP, CEMP and DEMP.	<p>The Applicant does not agree to add Lincolnshire Wildlife Trust as a prescribed consultee in relation to Requirement 8 (LEMP), Requirement 12 (CEMP), Requirement 13 (OEMP) and Requirement 20 (DEMP). North Kesteven District Council, as a relevant planning authority, is the approving body for these requirements and before approving the management plans, must consult with several prescribed consultees. As set out in the aforementioned requirements of Schedule 2 to the draft DCO [REP2-005], the prescribed consultees for these management plans are:</p> <ul style="list-style-type: none"> • LEMP (Requirement 8) – Lincolnshire County Council (LCC), Natural England, and the Environment Agency. • CEMP (Requirement 12) – LCC (as the local highway authority and waste planning authority), National Highways, and the Environment Agency. • OEMP (Requirement 13) – LCC (as the local highway authority and waste 	Under Discussion

Reference	Description of Matter	Lincolnshire Wildlife Trust Position	Applicant Position	Status
			<p>planning authority), National Highways, and the Environment Agency.</p> <ul style="list-style-type: none"> • DEMP (Requirement 20) – LCC (as the local highway authority and waste planning authority), National Highways, and the Environment Agency. <p>It is standard practice for a relevant planning authority, local highway authority and waste planning authority to be a prescribed consultee for a DCO Requirement hence the inclusion of LCC. It is also standard practice for various statutory bodies to be prescribed consultees for various DCO Requirements according to their relevant statutory functions hence the inclusion of Natural England, National Highways, and the Environment Agency. On the other hand, Lincolnshire Wildlife Trust is not a statutory body but a voluntary, independent charitable organisation and as such, it would not be appropriate for Lincolnshire Wildlife Trust to be a prescribed consultee for a DCO Requirement.</p>	
Other				
4.1.13	Sale of Biodiversity Net Gain units	Biodiversity units should not be sold on to other development projects and should	Full details of the Biodiversity Net Gain (BNG) assessment are provided in the	Under Discussion

Reference	Description of Matter	Lincolnshire Wildlife Trust Position	Applicant Position	Status
		<p>remain within this scheme contributing to the 'additionality' pillar of the BNG framework</p>	<p>Biodiversity Net Gain Report [APP-194]. The delivery of BNG is set out in the Framework LEMP [REP2-021], a detailed version of which is to be developed, substantially in accordance with the framework and secured under Requirement 8 (Landscape and Ecological Management Plan) of the draft DCO [REP2-005]. The Applicant has committed to the delivery of a minimum of 30% BNG in habitat units, 50% BNG in hedgerow units and 10% BNG in watercourse units, as secured by Requirement 8 of Schedule 2 to the draft DCO [REP2-005]. Therefore, the Applicant does not intend to seek the trading of any units which form part of the minimum BNG delivery committed to in the DCO. However, if the Applicant were to deliver BNG units over and above the amounts committed to in the DCO, it may seek to trade these. Given the commencement of the Proposed Development is some five years away, the Applicant has no way of knowing what projects may be in existence at that time. The Applicant therefore does not consider</p>	

Reference	Description of Matter	Lincolnshire Wildlife Trust Position	Applicant Position	Status
			<p>it necessary to place any form of restriction on the trading of BNG units as it is committed to the minimum delivery secured under Requirement 8 of Schedule 2 to the draft DCO [REP2-005]. The Applicant is pleased to exceed the statutory requirements for BNG and is not currently considering working with landowners to produce surplus BNG credits for selling to the market.</p>	
4.1.14	BNG Trading Rules	<p>BNG trading rules have not been satisfied for high distinctiveness habitat (traditional orchard), or medium distinctiveness habitats. This must be addressed.</p>	<p>A revised version of the Biodiversity Net Gain report, which will further address the Trading Rules will be submitted to the Examination at Deadline 3.</p> <p>The revised version of the BNG report now satisfies the trading rules for ‘Heathland and shrub – Mixed Scrub’ and ‘Cropland – Arable field margins’ habitats.</p> <p>To achieve this the Applicant undertook a review of the classification of ‘arable field margins’ against the Priority Habitat description and where appropriate re-defined. This resulted in a reduced area of arable field margin habitat.</p>	Under Discussion

Reference	Description of Matter	Lincolnshire Wildlife Trust Position	Applicant Position	Status
			<p>To offset the residual loss of arable field margins and the small area of mixed shrub the Applicant has done the following:</p> <ul style="list-style-type: none"> • Partly offset this with the creation of a higher distinctiveness habitat - Traditional Orchard • Committed to the annual creation of arable field margins within the areas of retained arable within the Order limits. These will be set out in the Framework Landscape and Ecological Management Plan. <p>The metric still reports a loss of 'Lake-Reservoir', as a worst-case, however, efforts to avoid any loss of this poor biodiversity value agricultural reservoir will be considered during detailed design, post-development.</p>	

References

- Ref 1 Department for Energy Security & Net Zero (2025). Overarching National Policy Statement for Energy (EN-1). Available at: [Overarching National Policy Statement for Energy \(EN-1\) – December 2025](#)