



**Application by Fosse Green Energy Ltd for an order granting
development consent for the Fosse Green Energy solar farm**

Comments on submissions received by deadline 6

**by North Kesteven District Council
(ID FD1E96A6C)**

NKDC reference: 23/0325/NSIP

Planning Inspectorate reference: EN010154

9th June 2026

1. This document sets out North Kesteven District Council's submissions at the final Deadline 7 for the Fosse Green Energy NSIP examination. It includes comments on documents submitted by the Applicant at Deadline 6; together with some closing remarks.

REP6-007: Design Approach Document (Rev2)

2. NKDC notes that Appendix A Design Commitments has now been removed and forms the certified document referred to in the DCO.

REP6-009: Framework Construction Environmental Management Plan (Rev8)

3. NKDC welcomes the change to Table 3.7 Noise – item r. on pages 56 – 57, which now includes a reporting clause to demonstrate that late working (between the hours of 18:00 – 19:00) is below the existing ambient environment.

REP6-013: Framework Decommissioning Environmental Management Plan

4. NKDC welcomes the changes to Table 9 on page 36 which clarify that an updated dust risk assessment – including a review of sensitive receptors - will be prepared and agreed with the relevant planning authority prior to decommissioning.

REP6-015: Framework Soil Management Plan (Rev7)

5. NKDC welcomes the changes to the following paragraphs of the FSMP:
 - 3.1.2 - clarifying that the listed guidance will be adhered to.
 - 5.3.3 – setting out a test to be adopted for soil handling suitability, related to moisture content.
6. However, the Council notes the wording of paragraph 5.4.1, which states that heavy textured topsoils are less susceptible to damage when handled wet. This is not the case, and appears inconsistent with the statement at paragraph 5.5.1 on heavy textured subsoils being susceptible to damage when handled wet. The Council suspects that this text has been submitted in error, and that the intention was to insert the corrective text set out on page 91 of REP6-030, where the Applicant commented on NKDC's response to ExQ3 FS.3.03.

REP6-019: Framework Landscape and Environmental Management Plan (Rev9)

Paragraph 4.1.19

7. NKDC notes the amendment relating to the sowing of wildflower mixes and rotation of field margins.

Paragraph 6.1.2

8. NKDC welcomes the amendment to the text to remove the previous seven day closure caveat for permissive paths. The Council is content that this has been replaced with a provision for closures for the purposes of maintenance and repair, with prior notification to the relevant planning authority.

Paragraph 6.1.10

9. NKDC has no issue with confirmation that signage will be erected noting that the use of permissive paths by the public is by permission of the landowner. Such signage is already in place for permissive paths used as Stepping Out Walks.

Paragraph 7.1.9 and Appendix C

10. NKDC notes the Terms of Reference for the Ecological Advisory Group (EAG) provided at Appendix C.
11. NKDC has already provided extracts from the Beacon Fen Energy Park Outline Landscape and Ecological Management Plan as an example of appropriate terms of reference for such a body (see REP5A-046, Appendix C, Annex 3).
12. As an additional example, extracts from the final certified version of the Outline Landscape and Ecology Management Plan for the Springwell Solar Farm DCO are attached as Appendix A to this submission.
13. Both examples include a clear commitment to involve the local authorities, and to fund their participation in the Ecological Advisory Groups, which are equivalent to the EAG at Fosse Green.
14. The Council maintains its position that the EAG should involve the relevant planning authorities, and provide funding for this involvement.

REP6-021: Framework Battery Safety Management Plan (Rev4), and

REP6-034: Design Commitments (Rev2)

15. NKDC welcomes that paragraph 2.3.5 of the FBSMP has been amended to apply a 200m minimum separation distance from residential structures for both the centralised BESS and the distributed BESS; and that paragraph 4.5.8 has also been made consistent with this separation distance.
16. The Council also welcomes that this is reflected in revised wording for BA1 on page 22 of REP6-034: Design Commitments (Rev2).
17. Please see overleaf for NKDC's Closing Comments.

NKDC Closing Comments

18. Whilst closing submissions are not expressly invited at deadline 7 the Council wishes to draw out a number of the more significant matters relevant to the Fosse Green project including those which the Council considers to be outstanding/unresolved at the closure of the Examination.
19. In NKDC's Local Impact Report (LIR) REP1-056, the Council reviewed the Proposed Development against 14 topic areas. The development was expected to result in positive effects in terms of climate change, broadly aligning with the strategic renewable energy and climate objectives set out in the Central Lincolnshire Local Plan (2023). The potential of the scheme to make a significant positive contribution to Biodiversity Net Gain was acknowledged; along with possible socio-economic benefits.
20. For the following topics, negative effects were identified, potentially exacerbated by the large scale and 60 year duration of the project:
 - Soils and Agriculture - impacts on Best and Most Versatile (BMV) agricultural land, and possibly food production
 - Landscape and Visual Impacts – including significant landscape character changes
 - Cultural Heritage impacts (above and below ground)
 - Ecology, including inadequate mitigation, and a deficient Biodiversity Net Gain Report
 - Rights of Way and Permissive Paths – including adverse impacts on the Stepping Out Walk network
 - Battery Energy Storage System (BESS) and Fire Safety – including a perception of risk to public health and safety
 - Grid Connection Deliverability – the dependence on the proposed Navenby Substation for which there is no planning permission
 - Cumulative Effects – both intra-project and inter-project
21. The Council also raised concerns around uncertainties related to maintenance and wholesale replacement of solar panels and equipment; prolonged outages and premature cessation of generation; the lack of a financial security to ensure the development would be decommissioned; and detailed points of drafting for the Development Consent Order (DCO), including in relation to fees for the discharge of Requirements.
22. Finally, the LIR set out the Council's general position on the need for funding to be provided to the Council in order to:
 - secure the delivery of a comprehensive employment, skills and supply chain (ESSC) package
 - fund independent verification monitoring of BNG, together with participation in the Applicant's proposed Ecological Advisory Group (EAG)

- provide mitigation and compensatory measures for adverse impacts on the Stepping Out Walk user experience

23. During the course of the examination, these issues have been developed and explored, including in the Council's Written Representation (REP1-057); and changes have been made to the scheme documents and the DCO. The Examining Authority has all of the detailed NKDC submissions on each topic, together with the Statement of Common Ground between the Council and the Applicant (REP4-013), and (at Deadline 7) the Statement of Commonality submitted by the Applicant.
24. Without prejudice to all of its detailed comments previously provided, NKDC would like to emphasise the concerns set out below regarding the proposed Fosse Green Energy development.

Grid Connection Deliverability

25. NKDC remains very concerned that, as currently drafted, the DCO would allow Permitted Preliminary Works (PPW) to be carried out, and the Proposed Development to commence without the proposed National Grid Navenby Substation (NGNS) even having the benefit of planning permission. The Proposed Development is dependent on NGNS being completed and available in order to achieve a grid connection – neither the site selection and design, nor the representations from NGET, have identified any alternative means of connection. The PPW and commencement works would have adverse environmental effects which are not justified in the absence of certainty that the benefits of renewable, low carbon electricity generation will be delivered.
26. The Council considers that it is not sufficient that no obvious reason has been presented to show why planning permission for NGNS would be refused. The planning application for NGNS has only recently been submitted and is not yet in a valid form – therefore there is limited information on which to base such a judgement. However, the Council has drawn both the Applicant and Examining Authority's attention to the detailed EIA scoping report and scoping opinion for the NGNS which are public documents on the Council's website consistent with the requirements of Regulation 28(2) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
27. Additionally, if such an obvious reason did exist, then that could potentially be a reason to refuse the grant of DCO. But to be clear, it is not the position of the Council that the absence of a planning permission for NGNS is in itself a reason to refuse the Fosse Green DCO. Rather, NKDC considers that if DCO is granted, it is necessary to impose an additional requirement which prohibits PPW and commencement works from taking place unless and until planning permission has been granted for NGNS.

28. Also to be clear, although the PPW Environmental Management Plan (and related provisions in the DCO) are welcome changes, this does not overcome the Council's objections on this issue. NKDC considers that, consistent with the mitigation hierarchy, it is better to avoid harmful effects rather than to seek to mitigate and compensate for them after the event.
29. Finally, the Examining Authority is aware of the on-going legal challenge by North Kesteven District Council and Lincolnshire County Council to the Secretary of State's decision on the Springwell Solar Farm DCO which includes this issue.

Soils and agriculture

30. In its LIR, NKDC recognised that the site selection and scheme design have made efforts to limit the amount of Best and Most Versatile (BMV) land which is affected by the Proposed Development; as well as changes to the Framework Soil Management Plan. Nevertheless, the Proposed Development will take a significant area of land out of agricultural use, including a substantial amount of BMV. The Council continues to have reservations about whether the whole of the Principal Site will be returned to its original agricultural grade, especially in areas subject to development for elements of the scheme such as hardstandings and roadways which the Council considers will be 'sealed over', as was concluded in the Springwell Solar Farm DCO decision.
31. The potential impacts of the Proposed Development on the agri-food sector and food security were raised in the Scoping Opinion, and in NKDC's LIR. The Council has queried whether the impacts of the development on food production and food security have been adequately assessed within the ES. This is an issue the Council urges the Examination Authority to carefully consider, particularly in light of the on-going challenge to the Secretary of State's decision on the Springwell Solar Farm DCO.

Landscape and visual effects

32. NKDC raised concerns in its LIR over the significant adverse effects on landscape character and the visual amenity of visual receptors during all phases of the Proposed Development. Some of these effects would be long term, and possibly permanent, introducing unfamiliar energy infrastructure development into a predominantly agricultural landscape to alter its character over a wide area – with cumulative effects arising from interactions with other NSIP and large-scale energy developments in the wider area. Parallels are drawn with the Springwell Solar Farm DCO, where the Secretary of State agreed with the Examining Authority that the cumulative effects constitute a new defining landuse characteristic for one of the national character areas, resulting in a moderate adverse (significant) effect.

33. Significant visual impacts would result, for instance on users of rights of way and other paths – including Stepping Out Walks, as discussed further below. The Council also considers that the perception and experience of the landscape will be adversely affected for those travelling through the area and experiencing sequential effects with other energy infrastructure.
34. NKDC is generally satisfied that the proposals contained in the Framework LEMP are appropriate to provide mitigation for these adverse impacts, in so far as this is possible and without prejudice to the above comments. However, NKDC remains concerned that the Applicant has somewhat underestimated the adverse effects; and at the same time is over optimistic about the ability of planting to successfully provide mitigation.

Cultural heritage

35. In its LIR, NKDC raised issues with the assessment methodology and findings for the effects of the Proposed Development on above-ground heritage assets. These included the extent of the study area used, and the lack of detailed, bespoke assessments for a number of heritage assets. Unfortunately little progress has been made on these issues during the course of the examination, with little by way of additional substantive analysis and justification in the submitted Heritage Technical Note. The Council considers that there are a number of listed buildings which require further individual assessment (as opposed to group assessment) and a bespoke mitigation strategy. None of this has been forthcoming, so the Council maintains its objections on this issue.
36. In relation to archaeology (below-ground heritage assets), progress has been made since NKDC's LIR, with proposals for further trenching agreed - although this does not entirely address the Council's concerns regarding the Applicant's assessment of the significance of effects on archaeology, especially given the presumption in favour of preservation in planning. NKDC also remains concerned about the archaeological significance of resources beneath the A46; and has outstanding concerns regarding the earthworks associated with the settlement of Morton.

Ecology and Biodiversity Net Gain

37. NKDC is satisfied that appropriate mitigation for adverse ecological impacts has been incorporated into the of the Proposed Development, including the Framework Landscape and Ecology Management Plan (FLEMP).
38. The Applicant claims that the moderate benefits arising from the Biodiversity Net Gain (BNG) should be given substantial positive weight in the planning balance. Whilst the application of planning balance and weight is not a matter for the Council, this will only be the case if the suggested BNG is delivered in reality. Whilst the BNG Report has been brought up to an acceptable standard during the course of the examination, NKDC remains concerned in two respects: BNG monitoring, and participation in the Applicant's proposed Ecological Advisory Group (EAG).

39. The Applicant has made no provision to fund NKDC's independent BNG verification monitoring of the development. Independent Council monitoring acts as a quality assurance check of the Applicant's own monitoring results, ensuring that NKDC fulfils its role as an enforcement body. Such monitoring and its funding is already standard practice in relation to developments under the Town and Country Planning Act 1990, in accordance with the Council's adopted guidance. NKDC note the Government is moving towards statutory BNG requirements for NSIPs later this year, and has also amended secondary legislation to enable cost recovery for Council services. The Council maintains its position that the Applicant should, consistent with other developers, fund the BNG verification monitoring.
40. The Applicant has proposed an Ecological Advisory Group (EAG) to help guide the delivery of BNG, including review of BNG monitoring reports, and where necessary inputting to revisions to Landscape and Ecology Management Plans (LEMPs) submitted to the relevant planning authority for approval. NKDC would have a positive, collaborative role in the EAG by:
 - a) contributing to monitoring reviews, including through providing its own verification checks as set out above
 - b) inputting to reviews of and amendments to LEMPs, which would be likely to assist in their formal approval (and thereby avoiding unnecessary delays, and potentially refusals and associated appeals)
41. Unlike for other solar NSIPs in the area such as Springwell Solar Farm and Beacon Fen Energy Park, the Applicant refuses to involve and fund the participation of the relevant planning authorities (NKDC and Lincolnshire County Council) in the EAG; and as above BNG verification monitoring as a key component of the EAG. NKDC maintains its objection to exclusion from and absence of funding for participation in the EAG, and considers that this should be provided for in an article in the DCO, similar to that it is understood will be offered by the Applicant at Deadline 7 in relation to funding for Stepping Out Walk measures. In short, our view is the Applicant's position on the matter of EAG/BNG funding is deeply frustrating, dismissive and disappointing. It is out of step with the approach adopted in relation to the Springwell and Beacon Fen solar NSIP projects and means that these costs will now need to be absorbed by the public purse (which is unacceptable) when the Council has repeatedly set out – with supporting evidence - why that should not be the case. This remains a matter of significant outstanding objection.

Rights of Way and Permissive Paths

42. NKDC has explained at length during the examination how the Stepping Out Walks provide a range of socio-economic benefits, including to the tourist economy, and in terms of recreation, mental and physical health. These walks, using a combination of statutory rights of way and permissive paths, are actively promoted and well used. The Proposed Development would have adverse effects on the user experience for people walking three existing Stepping Out Walks

which cross and pass alongside the Principal Site. Effectively, users would no longer walk through undeveloped countryside, often experiencing wide the open views which form a major part of their selection and promotion. Instead, users would pass between and alongside extensive areas of solar panels and associated infrastructure. Mitigation planting would help to reduce some of those adverse effects, but it would not entirely remove them; and in some instances screen planting may foreshorten views, creating its own adverse effects.

43. NKDC considers that the Applicant has not fully recognised the status of Stepping Out Walks, and the adverse effects of the development on users. Further, the Council considers that these impacts on user experience are likely to reduce their attractiveness for different groups; with a consequent reduction in their value in delivering socio-economic benefits.
44. Nevertheless, the Council welcomes the Applicant's agreement to amend the DCO at Deadline 7 to introduce a new article committing to a financial contribution for mitigation and compensation measures for Stepping Out Walks. On that basis, the Council considers that the adverse effects will be appropriately addressed by the Proposed Development

Battery Energy Storage System (BESS) and Fire Safety

45. NKDC defers to Lincolnshire Fire and Rescue Services in respect of the majority of issues related to the BESS system and fire safety. However, the Council expressed concerns in its LIR in connection with the choice of battery system; and regarding the perception of risk to public safety.
46. Helpful clarification of the separation of the BESS (whether centralised or distributed) has been provided in the certified documents. The only additional comments that NKDC wish to make are that the Examining Authority should:
 - a) take into account that the perception of risk to public safety, as well as substantiated risks, is capable of being a material planning consideration; and
 - b) consider whether it is necessary to impose a requirement specifying the safest available battery system to be used in the BESS.

Replacement and maintenance

47. In its LIR, NKDC expressed concerns about the definition of 'maintain' in article 2 of the DCO, which would allow for wholesale replacement of up to 99% of solar panels in any 12-month period. Whilst indicative maintenance schedules have since been provided, the Council remains concerned at the potential for adverse effects during the wholesale panel replacement period, which is inevitable given the anticipated lifespan of the solar panels coupled with the 60 duration of the Proposed Development.
48. Therefore NKDC suggests that the definition of 'maintain' is amended to impose a cap on panel replacement of around 50% per year, ensuring wholesale

replacement occurs over at least two years. This would recognise both the Applicant's desire for flexibility, and the Council's concerns to limit adverse effects during the Operational stage of the Proposed Development.

Outages / early cessation and decommissioning

49. In its LIR, NKDC expressed concern regarding the relationship between Requirement 20 covering decommissioning, and the definition of 'date of final commissioning'. The Council is satisfied that this has been resolved, and is grateful to the Applicant for addressing this issue.
50. However, in the LIR NKDC also raised concerns regarding how periods of extended 'outage' (i.e. suspension of generation) would be dealt with; together with securing funding for decommissioning. On the first of these points, NKDC is concerned that the DCO addresses the risk that all or part of the Proposed Development may cease to generate electricity significantly prior to the end of the projected 60 year lifespan. If such premature cessation occurs, then the Council considers that the undertaker should be compelled to decommission that part within a reasonable timescale, restoring the land to its original pre-development condition. Otherwise, there is the possibility that the development remains in place with adverse effects in terms of, for instance, landscape and visual impacts; but with none of the benefits from renewable energy generation. The Council considers that the need for a provision requiring decommissioning in the event of premature cessation is increased by the extended 60 operational lifespan of the development, which inevitably leads to greater uncertainty over future circumstances.
51. NKDC also considers that there is a need for a financial security (perhaps in the form of a bond or sinking fund) to be put in place to ensure that the Proposed Development will be decommissioned and the land restored – either following premature cessation of generation, or at the end of the projected 60 year operational phase. Otherwise, there is a risk that there will be insufficient income available in the latter stages of the development to fund decommissioning. As the Examining Authority has pointed out, even with the criminal sanctions available to a relevant planning authority seeking to enforce the requirements of a DCO, that in itself would not secure restoration of the land. In this regard we welcome the Applicant's latest 'without prejudice' additional Requirement on this matter introduced at deadline 5A (REP5A-037, responding to ExQ3 DCO.3.05).

Application fees

52. After prolonged exchanges of documents, the Applicant has amended the DCO to include an appropriate schedule of fees for the discharge of Requirement approvals in Schedule 15.
53. However, the Council is very disappointed that the Applicant refuses to make these fees subject to inflationary increases. The Government has made

applications under the Town and Country Planning Act 1990 subject to annual inflation increases, in line with the Consumer Price Index. The Applicant has provided no justification as to why it should be treated differently to other developers. The discharge approval applications are unlikely to all be submitted within the current year to April 2027; and the Council is not immune from the effects of inflation over that period. Therefore, the Council maintains its objection to the absence of an inflationary provision covering application fees, and urges the Examining Authority to include the 'without prejudice' paragraph it requested from the Applicant.

Employment, Skills and Supply Chain (ESSC)

54. The Applicant has submitted a Framework ESSC Plan, with the submission and approval of a detailed ESSCP secured by Requirement 19 of the DCO. However, NKDC is disappointed by the refusal of the Applicant to provide funding which the Council considers is necessary to secure the full delivery of the ESSCP, which in turn would provide legacy economic benefits, as encouraged by NPS EN-1 paragraph 5.13.11.
55. Such funding commitments have been provided via s.106 obligations in relation to the Heckington Fen Solar Park and the Springwell Solar Farm DCOs. NKDC maintains that without a similar funding commitment for the Fosse Green Energy proposals, the ExA should not afford employment and skills the moderate positive weight in the planning balance which the Applicant attributes to the ESSCP.



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9th June 2026

Springwell Solar Farm

Outline Landscape and Ecology Management Plan (oLEMP)

EN010149/APP/7.9.5
Revision 5
Deadline 5
Oct 2025
Springwell Energyfarm Ltd

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

7. Roles, Responsibilities and Monitoring

7.1. Roles and Responsibilities

- 7.1.1. Protected species surveys and checks by a suitably qualified Ecological Clerk of Works (ECoW) would also be required prior to any works which may disturb or cause harm. These would include bird nest checks, badger surveys, barn owl, quail and other bird surveys and bat 'roost' surveys (if any trees/structures with bat roost potential are to be affected by works) as appropriate - depending on nature and timings of works. Note that surveys prior to construction works starting would be secured via the CEMP.
- 7.1.2. There will be a full review and update of the detailed LEMP(s) every 5 years by a suitably qualified ecologist and landscape architect.
- 7.1.3. Where the delivery of the detailed LEMP(s) is not being met for whatever reason(s) appropriate action will be identified and taken to rectify failings. This may entail making changes to specification of planting species if these are failing to establish successfully, including additional planting and/or replacement planting for planting that has failed to establish. Equally, where successes are identified, these should be promoted further and lessons learned from both success and failure fed into the next iteration of the detailed LEMP(s).
- 7.1.4. Any works to trees identified as a result of monitoring will be undertaken by a suitably qualified arborist. A list of approved contractors is available from the Arboricultural Association.

7.2. Ecological Steering Group (ESG)

- 7.2.1. This section sets out the draft Terms of Reference (TOR) for the Ecological Steering Group. The remit of the ESG is as follows:
 - to monitor the progress and implementation of the detailed LEMP(s), the aim of which is to achieve the biodiversity mitigation and enhancement as laid out in the oLEMP;
 - to provide oversight and scrutiny of the BNG monitoring undertaken by the Applicant;
 - to provide communication on landscape and biodiversity matters between the Proposed Development and relevant stakeholders;
 - to consider and suggest remedial habitat management measures to be implemented when habitat creation and enhancement are not meeting the required condition as outlined in the LEMP(s), based on a review of monitoring reports;

- to undertake a compliance audit of the LEMP(s) against key performance indicators (to be agreed with the ESG following approval of the LEMP(s) every five years;
- to work with the Applicant in meeting its commitments in the DEMP with regards to dealing with ecological habitats post the carrying out of the decommissioning works; and
- in conjunction with the Applicant, the co-ordination of any research projects planned around the Proposed Development and dissemination of the outcomes of any research both within the Proposed Development and externally.

- 7.2.2. The Applicant shall have regard to any reviews, recommendations or updates received from the Group in accordance with its terms of reference and thereafter employ reasonable endeavours to implement any competent recommendations including, where necessary, through proposing to the Group such alterations to ecological management measures as the Applicant considers appropriate, having regard what is reasonable, practicable and achievable.
- 7.2.3. The formation of the ESG may provide opportunities for strategic collaboration with other solar projects within the region.
- 7.2.4. The Applicant will establish the ESG at least 6 months prior to the submission of the first detailed LEMP(s) to help inform the development of the LEMP(s). The ESG would convene in advance of the commencement of such works, and shall continue to exist until completion of decommissioning works, unless a shorter period is agreed between the members of the ESG.
- 7.2.5. The ESG shall comprise up to but not limited to:
- two representatives nominated by the Applicant, at least one of which being a suitably qualified and experienced ecologist.
 - one representative from Lincolnshire County Council; and
 - one representative from North Kesteven District Council.
- 7.2.6. The ESG will encourage representation at its meetings by representatives from relevant nature conservation organisations as and when required.
- 7.2.7. The Applicant will be responsible for the administration of convening annual meetings of the ESG. Meetings will be chaired by an appropriately qualified member of the ESG and be quorate if at least 3 members are present.

- 7.2.8. Once established, the ESG shall meet at least twice annually for the 10 years and then move to a single annual meeting thereafter, either virtually or in a convenient location to be agreed by the ESG. Decisions and recommendations made by the ESG would normally be on the basis of consensus. In the unusual case of needing to put a decision to the vote, this would be by a majority vote from those attending that meeting. The remit of the ESG cannot be extended beyond the scope of measures in this oLEMP.
- 7.2.9. The Applicant will meet all reasonable costs of attendees of the ESG related to the attendance at meetings and reviewing supplied material. Additional costs will be met where deemed necessary and agreed in advance between the ESG members. The mechanism to securing funding for the costs will be via the S106 agreement.

7.3. Monitoring

- 7.3.1. The detailed LEMP(s) would continue to be monitored for the entirety of the operational phase of the Proposed Development.
- 7.3.2. Note that the timeline for the operation of each phase of the Proposed Development is 40 years, which exceeds the 30-year timeline for mandatory biodiversity net gain. After 30 years, the management of habitats will fall under the general management prescriptions set out within the detailed LEMP(s).
- 7.3.3. Once the 30-year commitment for habitats created to deliver BNG has ceased the management plan and monitoring requirements will be reviewed for the remaining 10 years of the operational life of the Proposed Development.
- 7.3.4. Following completion of construction, monitoring of all habitats being created and enhanced for the delivery of biodiversity net gain will be undertaken in years 1, 2, 3 and 5, 10, 15, 20, 25 and 30 against the BNG Metric target habitat types and condition.
- 7.3.5. Monitoring of new tree and hedgerow heights and densities will be undertaken in years 1, 2, 3, 5 and 10 to help ensure they reach the target heights set out in the Environmental Statement. For hedgerows, the target height is at least 3.5m with a width of at least 1.5m at 1.5m above ground level by Year 10. For woodland and scrub, the target height is at least 4m by Year 10.
- 7.3.6. Monitoring of calcareous grassland creation areas, which are mitigation for loss of LWS verges, would be monitored in years 1, 3 and 5. After this the need for any further monitoring would be reviewed.

- 7.3.7. Notable arable weeds would also be monitored in years 1, 3 and 5, and then every 5 years up to year 30 in fields Bcd105 and Bcd 115 to ensure management of the margins are continuing to maintain the arable flora recorded. Annual spot checks would also be undertaken to ensure pernicious weeds (such as dock and thistle) to not become a problem.
- 7.3.8. Results of each monitoring visit will be compiled into a short monitoring report for the Site. These should follow BNG monitoring guidance **[Ref 7.1]** and present survey details, summary of progress, an overview of site wide successes and challenges, detailed review of the progress of each ecological feature and a list of actions or adaptive management practices required for the next monitoring period.
- 7.3.9. Protected species monitoring will be undertaken to understand the effectiveness of the mitigation. This will involve surveys for ground nesting birds and bats:
- For bats, the baseline activity surveys (carried out in spring, summer and autumn) would be repeated in years 1, 3, 5 and 10. The need for any further monitoring would then be reviewed
 - For ground nesting birds, the baseline surveys would be repeated in years 1, 3 and 10. With specific assessment of skylarks, within areas set aside for mitigation, monitored in years 1, 3 and 5 then reviewed.