One Earth Solar Farm

Written Representation

EN-010159

West Lindsey District Council

July 2025

Contents

1. Introduction

1.1. This document forms the Written Representation (WR) of West Lindsey District Council (WLDC) to the examination of the One Earth Solar Farm (OESF) Nationally Significant Infrastructure Project (NSIP) application (the 'Scheme').

1.2. This written representation is based on the Council's current understanding of the information comprised in the application for the Scheme at the time of writing. The Council's position on individual topics may therefore change and/or be supplemented as the Examination progresses particularly if there is meaningful engagement with the Applicant on key topics of concern.

Purpose and scope of the Written Representation

1.3. This WR set out WLDC's case in terms of the merits of the Scheme. It sets out the statutory decision-making requirements, and the relevant planning policy framework upon which the application is to be assessed to determine whether development consent should be granted under the Planning Act 2008 (PA2008).

1.4. This WR focusses on the key matters of concern for WLDC and provides an assessment of the overall project against policy, balancing its benefits and disbenefits to reach an overall conclusion about the acceptability of the application.

1.5. This WR incorporates the written summary of oral submissions made by WLDC at the examination hearings in week beginning 7th July 2025.

Relationship with the Local Impact Report

1.6. WLDC have submitted a Local Impact Report (LIR) under the provision of section 60 of the PA2008.

1.7. The purpose of the LIR is to set out WLDC's view on the local impacts of the project. Following an assessment of the application documents, the LIR identifies these key impacts and provides reasoning as to why they have been identified. The LIR does not calibrate any weighting to the impacts identified, and nor does it carry out an assessment against policy with a 'planning balance' exercise to reach a conclusion on the overall acceptability of the OESF application.

1.8. This WR is therefore to be read alongside the LIR as a document that goes beyond solely identifying impacts and serves as an assessment of the merits of the application against policy as required by the PA2008.

2. West Lindsey District - Local Context

Central Lincolnshire and the West Lindsey district

2.1. West Lindsey is a district council located in Central Lincolnshire, a collective area that encompasses the City of Lincoln, North Kesteven and West Lindsey. The West Lindsey district covers an area of over 115,700Ha (1,150km^2) and is located within Lincolnshire County Council who are the county council and are also impacted by the proposed solar farms.

2.2. Central Lincolnshire is characterised by a population that lives in a range of settlements that vary in size and character. Lincoln is the largest settlement with a population of approximately 110,000 living in the principle urban area. Lincoln acts as a service centre over a wide geographical area, with villages sourcing most services and employment requirements in the city, effectively extending its catchment population to around 165,000.

2.3. West Lindsey borders North Lincolnshire and North East Lincolnshire to the north; East Lindsey in the east; North Kesteven and the city of Lincoln in the south. The River Trent forms a natural boundary to the west where the district meets Bassetlaw District Council and Newark and Sherwood District Council, within the administrative region of Nottinghamshire County Council.

2.4. The West Lindsey district hosts main towns such as Gainsborough, Caistor and Market Rasen, which serve the northern and southern parts of the wider Central Lincolnshire area. Gainsborough experienced significant growth during the 19th century as an industrial and engineering centre, with a shift of focus to manufacturing in the 20th century. It now provides a thriving manufacturing/engineering sector with national and international companies headquartered in the town.

2.5. WLDC is predominantly rural and interspersed with settlements across the area. The district provides an attractive setting for its three market towns of Caistor, Gainsborough and Market Rasen. The district is the 13th most sparsely populated area in England with a population of 95,153 and a density of 82 people per km^2 based on 2021 census data from the Office of National Statistics (ONS). The population has increased by 6% since the last census in 2011. Over 23% of the population of West Lindsey in the census are over the retirement age compared to 19% in the rest of the United Kingdom

2.6. The remainder of Central Lincolnshire and the West Lindsey district is predominantly rural, characterised by a settlement pattern of villages as well as the smaller towns of Market Rasen and Caistor. As set out above, the average population density is amongst the lowest in lowland England, with the majority of settlements not exceeding a few hundred people.

2.7. Collectively, the rural area nonetheless accounts for over half of Central Lincolnshire's population. Functionally, the rural villages typically operate as clusters that share key services, with larger villages acting as local service centres upon which communities rely for basic facilities and as social hubs.

2.8. The Ministry of Defence (MoD) has a strong presence in the West Lindsey District and the wider Central Lincolnshire area. Active Royal Air Force (RAF) bases at Waddington, Cranwell and Digby make a significant contribution to the area's demographic and economic make up. Former bases have been utilised to deliver new housing and employment development. Following the closure of RAF Scampton and Home Office decision to end its plans to house asylum seekers there, the Council has announced its

own intentions to accelerate a £300 million regeneration plan, along with its development partner. Central Lincolnshire is home to the Red Arrows and its RAF heritage (including Lincolnshire's historic role as the centre of Bomber Command and the neighbouring base for the Battle of Britain Memorial Flight in East Lindsey) support the expansion for the area's existing visitor economy.

Landscape character

2.9. Central Lincolnshire's natural environment is varied and contrasting, characterised by gentle chalk and limestone uplands with low lying fens and fenland. The Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB) falls partly in Central Lincolnshire, with its distinctive landscape of rolling hills and nestling villages.

2.10. The wider rural landscape of Central Lincolnshire comprises a sweeping character with big skies, and is a highly valued asset, making a significant contribution to local distinctiveness and attractiveness.

2.11. The West Lindsey landscape is characterised by a consistent north-south grain, which forms one of its most striking characteristics. The broad valleys of the Trent and the Ancholme/Barlings Eau are subdivided by a narrow Jurassic limestones ridge, known locally as the 'Cliff'. The 'Cliff' is relatively narrow (circa. 5km) and runs the full length of Central Lincolnshire, forming a unifying topographic feature and, as a key factor in the origins and historic development of Lincoln, makes a strong contribution to its present quality and character. The 'Cliff; is a significant local feature, with a west facing scarp and a shallow eastern dip slope that falls towards the Lincoln Clay Vale. In this area field sizes are large, and the landscape character is of an open, agricultural landscape with well-spaced field boundaries and long-distance views.

2.12. Outside of the urban areas, land use in Central Lincolnshire and West Lindsey in particular is predominantly agricultural with intensive arable crops dominating. Soils are typically fertile and of high quality for agriculture.

2.13. West Lindsey and the wider Central Lincolnshire area hosts a wide range of natural habitats, including wetland, woodland, calcareous grassland and remnants of heathland fen, which together provide ecological networks and nodes of sufficient scale to support wildlife adaptation and environmental resilience to climate change.

2.14. Biodiversity in the area is experiencing pressure from factors including climate change, habitat fragmentation, development and large-scale intensive agriculture. Major landscape-scale initiatives are proposed to restore and enhance the areas ecological networks and corridors.

Socio-Economic

2.15. As set out in the Central Lincolnshire Local Plan, which is the Local Plan adopted by West Lindsey, Central Lincolnshire is located within the Greater Lincolnshire Local Enterprise Partnership (GLLEP) area and represents roughly 30% of the GLLEP area's population, employment and business base. The draft Local Industrial Strategy (LIS) notes that Greater Lincolnshire has an economy of £20.7bn with an ambition to grow the Gross Value Added (GVA) by £3.2bn by 2030. The GLLEP area boasts a mix of traditional manufacturing, a comprehensive agri-food sector, energy and services, and is strong in health and care and the visitor economy. In these sectors and others, the area benefits from a large number of small businesses – a distinctive feature of the economy.

2.16. The GLLEP's priority sectors include; agri-foods, energy and water, health and care, visitor economy and ports and logistics, but this should not diminish the important roles of other

sectors, including manufacturing and engineering, to the local economy. The Central Lincolnshire Authorities will play a key role in the delivery of the vision for most of these sectors.

2.17. The Economic Needs Assessment (ENA) (2020) projects the economic growth and job growth to 2040, which in turn was influenced by the LIS and other work being produced by the GLLEP. The ENA highlights that there has been strong growth in recent years, outstripping anticipated growth, and projects forward a growth of approximately 992 jobs per year.

Environment

2.18. The district is characterised by large-scale arable farmland and also hosts areas of valuable heathland, grassland, wetland and woodland interests. The most important grassland habitats are found on the chalk escarpment with a high concentration of acid grassland.

2.19. To the south and eastern fringes of Gainsborough there lies areas of wet meadow providing habitat for breeding waders such as curlew and redshank. A small meadow in the centre of the Marsh is designated as an SSSI with valuable wet meadow flora.

2.20. Water is an important aspect of Central Lincolnshire's environment. The area has a long history of land drainage and flood management, and significant areas of low-lying land are maintained for agriculture by pumped drainage. River flooding is closely controlled through embankments and washlands as part of wider management plans for the main river catchments. Conversely, Lincolnshire is already experiencing pressure on its water resources from increasing trends in consumer and commercial demand, coupled with predicted increases in the frequency and severity of drought due to climate change. Major new infrastructure to supply the Lincoln area with water abstracted from the Trent was completed in July 2014.

2.21. Due to its topographical characteristics, the area has a history of land drainage and flood management, and significant areas of low-lying land are maintained for agriculture by pumped drainage. River flooding is closely controlled through embankments and washlands as part of wider management plans for the main river catchments.

Key challenges

2.22. West Lindsey District and the wider Central Lincolnshire area is facing a range of challenges. These include the requirement to improve social and economic conditions, including health, housing, jobs and the range and quality of facilities, whilst also ensuring that the environment is improved and that growth does not erode the area's environmental and heritage assets, or increase pressure on natural resources.

3. The Scheme

3.1. The description of the Scheme is set out in the supporting Planning Statement and the Environmental Statement (ES).

3.2. The Scheme comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) array electricity generating facility, comprising:

- solar PV panels;
- Battery Energy Storage Systems (BESS);
- onsite substations; and
- associated grid connection infrastructure which will allow for the generation and export of electricity to the proposed National Grid High Marnham Substation.

3.3. The infrastructure components for which development consent is sought (development within the Order Limits) includes:

- PV Modules;
- Mounting structures;
- Power Conversion Stations;
- Battery Energy Storage Systems (BESS);
- Onsite Substation and Ancillary Buildings;
- Low Voltage Distribution Cables;
- Grid Connection Cables;
- Fencing, security and ancillary infrastructure;
- Access Tracks; and
- Green Infrastructure.

3.4. The applicant has secured a connection agreement with National Grid to allow the export of up to 740 megawatts (MW) of electricity to the High Marnham Substation.

4. Decision Making and Policy Framework

Legislation

4.1. WLDC recognises the application as one made under the Planning Act 2008 (PA2008) for a Development Consent Order (DCO) for development that falls within the definition of energy generating stations set out in section 15 of that Act.

4.2. The proposed development comprises the construction, operation and decommissioning of solar arrays for the generation of electricity, also including a Battery and Energy Storage System (BESS), the import/export connection to the National grid and onsite converter stations.

4.3. National Policy Statements (NPS) EN-1 and EN-1 provide policy for solar photovoltaic energy generation and are therefore designated NPSs that have effect for the proposed application. The OESF is to be determined under section 104 of the PA2008, which states:

> *"**104 Decisions in cases where national policy statement has effect***
>
> *(1) This section applies in relation to an application for an order granting development consent if a national policy statement has effect in relation to the development of the description to which the application relates.*
>
> *(2) In deciding the application, the Secretary of State must have regard to –*
>
> *(a) any national policy statement which has effect in relation to development of the description to which the application relates (a "relevant national policy statement"),*
>
> *(aa) the appropriate marine policy statements 9if any), determined in accordance with section 59 of the Marine and Coastal Access Act 2009;*
>
> *(a) Any local impact report (within the meaning given by section 60(3) submitted to the Secretary of State before the deadline specified in a notice under section 60(2);*
>
> *(b) Any matters prescribed in relation to development of the description to which the application relates, and*
>
> *(c) Any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision.*
>
> *(3) The Secretary of State must decide the application in accordance with any relevant national policy statement, except to the extent that one or more of subsection (4) to (8) applies.*
>
> *(4) This subsection applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant national policy statement would lead to the United Kingdom being in breach of any of its international obligations.*

(5) This subsection applies if the Secretary of State in satisfied that deciding the application in accordance with any relevant national policy statement would lead to the Secretary of State being in breach of any duty imposed on the Secretary of State by or under any enactment.

(6) This subsection applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant national policy statement would be unlawful by virtue of any enactment.

(7) This subsection applies if the Secretary of State is satisfied that the adverse impact of the proposed development would outweigh its benefits.

(8) This subsection applied if the Secretary of State is satisfied that any condition prescribed for deciding an application otherwise than in accordance with a national policy statement is met.

(9) For the avoidance of doubt, the fact that any relevant national policy statement identifies a location as suitable (or potentially suitable) for a particular description of development does not prevent one or more of subsections (4) to (8) from applying.

Local Impact Report

4.4. WLDC have submitted a Local Impact Report (LIR) relating to the OESF project alongside this Written Representation.

4.5. The LIR sets out what WLDC consider to be the key impacts of the scheme that should be given due consideration in the determination of the DCO application as being 'important and relevant' factors.

Other Relevant Matters

Statutory development plan

4.6. The Central Lincolnshire Local Plan (CLLP) forms part of the development plan for West Lindsey (replacing the previous Central Lincolnshire Local Plan, adopted in 2017). The Local Plan was adopted on 24th April 2023 and therefore represents an 'up to date' statutory development plan to which significant weight should be afforded in decision making under section 104 of the PA 2008. The key policies relevant to the development are listed below.

- The Vision for Central Lincolnshire
- Policy S1: The Spatial Strategy and Settlement Hierarchy
- Policy S10: Supporting a Circular Economy
- Policy S11: Embodied Carbon
- Policy S12: Water Efficiency and Sustainable Water Management
- Policy S14: Renewable energy
- Policy S15: Protecting Renewable Energy Infrastructure
- Policy S16: Wider Energy Infrastructure

- Policy S17: Carbon Sinks
- Policy S21: Flood Risk and Water Resources
- Policy S43: Sustainable Rural Tourism
- Policy S47: Accessibility and Transport
- Policy S53: Design and Amenity
- Policy S54: Health and Wellbeing
- Policy S57: The Historic Environment
- Policy S60: Protecting Biodiversity and Geodiversity
- Policy S61: Biodiversity Opportunity and Delivering Measurable Net Gains
- Policy S66: Trees, Woodland and Hedgerows
- Policy S67: Best and Most Versatile Agricultural Land

4.7. Whilst the CLLP should be read as a whole as an important and relevant matter, Policy S14 provides the technology specific policy applicable to the OESF project.

4.8. Compliance with this policy is considered essential for solar energy generating projects to be granted through the Planning Act 2008 as an important and relevant matter that should be given significant weight under section 105.

4.9. Policy S14 affirms a commitment to supporting the transition to a net zero carbon future and seeks to maximise appropriately located renewable energy generation in Central Lincolnshire, with an acknowledgement that such energy generation is likely to be wind and solar developments. The policy is supportive of the deployment of renewable energy schemes where direct, indirect, individual and cumulative impacts on a range of consideration are acceptable.

4.10. In order to comply with S14, compliance with the following three tests is required to be demonstrated:

i. The impacts are acceptable having considered the scale, siting and design, and the consequent impacts on landscape character; visual amenity; biodiversity; geodiversity; flood risk; townscape; heritage assets, their setting and the historic landscape; and highway safety and rail safety; and

ii. The impacts are acceptable on aviation and defence navigation system/communications; and

iii. The impacts are acceptable on the amenity of sensitive neighbouring uses (including local residents) by virtue of matters such as noise, dust, odour, shadow flicker, air quality and traffic.

4.11. Applicable policies within the CLLP are used to test a proposals compliance with test i) above.

4.12. For all three criteria, applicants are required to submit robust assessments. Where significant adverse effects are concluded by the decision maker following consideration of such assessments, the effects are to be weighed against the wider benefits of the application.

4.13. As part of a planning balance, significant additional weight in favour of the proposal will arise for any proposal which is community-led for the benefit of that community.

In addition to the above, Policy S14 provides additional policy specific for solar based energy proposals. In summary:

- Solar thermal and photovoltaic panels (and associated infrastructure) to be installed on existing property will benefit from a presumption in favour of permission unless there is a clear and demonstrable significant harm arising.

- Proposals for ground-based photovoltaics and associated infrastructure, including commercial scale proposals, will be under a presumption in favour unless:

  - There is clear and demonstrable significant harm arising; or
  - The proposal is to take place on Best and Most Versatile (BMV) agricultural land and does not meet the requirements of policy S67 (BMV Agricultural Land); or

    The land is allocated for another purpose in this Local Plan or other statutory based document, and the proposal is not compatible for such other allocation.

4.14. Other key local plan policies that feed into the consideration of S14 criteria include:

- **Policy S53 ('Design and Amenity')** - requires all development to achieve 'high quality sustainable design that contributes positively to local character, landscape and townscape, and supports diversity, equality and access for all' and that 'good design will be at the centre of every development proposal…'. Policy S53 provides a range of criteria for projects to demonstrate compliance which, although written in a form that relates to a wide range of developments, it includes policy that relates to the OESF project including;

  - Integrating into its surroundings;
  - Relating well to a site's local and wider context to enhancing existing character and distinctiveness to ensure development can satisfactorily assimilated into the surrounding area;
  - Enhancing existing character;
  - Making effective and efficient use of land;
  - Incorporate and retain as far as possible existing natural features;
  - Minimise the need for resources both in construction and operation.

- **Policy S54** requires the potential for achieving positive mental and physical health outcomes to be taken into account when considering all development proposals and requires developers to submit a Health Impact Assessment for non-residential development proposals of 5ha or more. Supplementary Planning Document (SPD) has also been published to help guide developers and decision makers on the implementation of policy S54 Health and Wellbeing in the Central Lincolnshire Local Plan.

- The adopted SPD defines Health as a "state of complete physical, mental and social wellbeing. As well as access to good quality healthcare services and lifestyle choices, there are many factors that affect health and wellbeing. These include the physical and social conditions in which people live, culture, education, housing, transport, employment, crime, income, leisure, and other services. These all influence health in either a positive or negative way, both directly and indirectly. These factors are commonly known as the wider determinants of health." (page 2).

The National Planning Policy Framework

4.15. The National Planning Policy Framework (NPPF) sets out the governments planning policies for England. The NPPF does not include policies specific to NSIPs.

4.16. The NPPF nonetheless provides guidance on the requirement for good design, promoting healthier communities, conserving the historic environment, conserving the natural environment, sustainable transport and meeting the challenges of climate change.

4.17. With regard to conserving and enhancing the natural environment, paragraph 180 states that "*Planning authorities and decisions should contribute to and enhance the natural and local environment by:*

a) *Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan*)."

4.18. WLDC consider the paragraph 174(a) to be a relevant consideration to the examination of the OESF, particularly with regard to indirect impacts upon the designated Area of Great Landscape Value (AGLV) protected by policy S62 of the adopted development plan.

Other relevant policy.

4.19. In addition to the above, WLDC consider the following policy to also be relevant and important for the determination of the application under section 105:

- UK Infrastructure: A 10 Year Strategy (2025)
- Solar Roadmap – United Kingdom Powered by Solar (2025)
- Clean Power Action Plan 2030 (2024)
- The British Energy Security Strategy (2022);
- The National Infrastructure Strategy (2020);
- The Energy White Paper: Powering our Net Zero Future (2020);

5. Key issues

5.1. The key issues identified by WLDC are set out in the sections below and assessed in terms of their compliance with policy and their acceptability in the context of section 104 of the PA2008.

5.2. The impacts are considered in terms of:

- **Cumulative impacts** with other NSIP solar farm projects;
- **Individual project impacts** (in solus)

Cumulative impacts

5.3. WLDCs key concerns and objections to the OESF relate to its cumulative impact with other NSIP solar electricity generating stations that have either been consented or are awaiting decision.

5.4. There are four other NSIP solar schemes to which the OESF will add further significant impacts to the West Lindsey District:

Gate Burton Energy Park (531MW) (Order Limits: 824ha approx.) – Consented 12/07/2024

Cottam Solar Project (600MW) (Order Limits: 1450ha approx.) – Consented 05/09/2024

West Burton Solar Project (480MW) (Order Limits: 886ha approx.) – Consented 24/01/2025

Tillbridge Solar Project (500MW) – (Order Limits: 1670ha approx.) - Decision stage

5.5. The OESF Order Limits extend to approximately 1,414ha (14.14km2) and would add a further 750MW of solar development to the existing cumulative baseline. This would result in a total cumulative Order Limits land take of approximately 6,244ha/ 62.44km^2 and total generation of 2,861MW / 2.861GW.

5.6. This amount of solar development within a close geographical area is unprecedented and gives rise to significant adverse impacts that have not been experienced on a cumulative basis in England.

5.7. From the commencement of the examination of the first NSIP solar application, WLDC have raised significant concerns regarding the cumulative impacts of all of the projects and the approach to decision making. Whilst NSIP applications are examined and determined on an individual basis with cumulative impacts extending only to recognition that such assessments have been carried out in an ES, WLDCs consistent view is that the applications should have been determined on the basis of their acceptability as a group of projects. The impacts of all of the NSIPS against the baseline of a rural agricultural environment will be significant and harmful, including the construction phase.

5.8. The overarching policy context for the consideration of cumulative impacts are set out in the relevant NPSs. NPS EN-1 requires the Secretary of State, when considering any proposed development and weighing its adverse impacts against its benefits, to take into account "*its potential adverse impacts…including any long-term and cumulative adverse impacts*" (NPS EN-1 para. 4.1.5).

5.9. Applicants are required to set out how residual impacts will be compensated for as far as possible, setting out how any mitigation or compensation will be monitored and agreed to ensure success and that action is taken (including adaptive management). Cumulative impacts of multiple developments with residual impacts must also be considered (NPS EN-1 para, 4.2.12).

5.10. WLDC's concerns around the potential cumulative construction period is derived from the lifespan of the DCOs that have been granted or sought, and the estimated construction periods cited in the respective project ESs.

5.11. The DCO lifespan being sought for projects is 5 years and the estimated construction period is 24 months, aside from the Gate Burton Energy Park which cites a period of 24-36 months.

5.12. Based upon these parameters for the 4 NSIPs either consented, at decision stage or in examination, plus the 5th NSIP due to be submitted shortly, a simple 'staggering' of development periods within the 5-year validity period for each consent could lead to construction activity occurring up to 2033. There is no control over the commencement of construction aside from that it must do so within 5 years of the Orders coming into force.

5.13. The table below helps demonstrate this potential scenario.

WEST LINDSEY DISTRICT COUNCIL
NSIP SOLAR FARMS
POTENTIAL PROGNOSIS OF CONSTRUCTION
**24 month construction period assumption*

Key:

DCO granted
Expected decision date
Decision estimated
Construction period

			YEAR											
PROJECT	**DCO into force**	**Est. Construction period (longest**	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Gate Burton Energy Park	Aug-24	36 months												
Cottam Solar Project	Sep-24	24 months												
West Burton Solar Project	Jan-25	24 months												
Tillbridge Solar Project	Oct-25	24 months												
One Earth Solar Farm	Dec-26	24 months												

5.14. WLDC have concerns that the cumulative effects of these NSIP solar schemes in particular have not been carried through adequately to the cumulative assessment, in particular in relation to traffic impacts. For example, the table at Appendix A.18.2 [APP-146] indicates that the Tillbridge solar DCO scheme has not been taken forward to the cumulative assessment. However, as indicated above the reported temporal scopes overlap, and, from an analysis of Figure 6 of the OESF Transport Assessment [APP-136] and Figures 1 and 2 in Appendix B of the Tillbridge Framework Constriction Traffic Management Plan [Tillbridge REP5-020] the general construction traffic routes appear to overlap on the A57, as do abnormal indivisible load (AIL) routes. The AIL routes also coincide, particularly along the A15. WLDC would like to request the applicant reviews the cumulative assessment and further justifies the exclusion of the 5 solar schemes listed above from cumulative assessments.

5.15. WLDC consider this period to be a significant length of time for residents to endure and highlight the impact as one that should be considered negatively in the planning balance.

5.16. The matters below discuss further specific impacts in more detail.

Lifespan of the project and its impacts

5.17. The proposed the lifespan of the project is to be for a period of 60 years. This is consistent with the other four NSIP solar schemes in the district, who have either secured or are seeking a consent for this period of time.

5.18. NPS EN-3 states that an upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation (para. 2.10.65).

5.19. The applicant considers the Scheme to constitute a 'temporary' development and have applied this to is assessment of impacts in the ES. This has resulted in the impacts being factored on the basis that they will only be experienced on a temporary basis.

5.20. WLDC consider a 60-year timescale to be a significant period time, lasting over several generations. It will result in its impact being no different to that of permanent development. The OESF would exist, potentially alongside other cumulative NSIP solar projects, up to and beyond the year 2090.

5.21. To reduce or downgrade impacts on the basis that 60 years is 'temporary' results in a false outcome. WLDC consider that impacts should have been assessed on the basis that they were effectively 'permanent'. All assessments should have been carried out on the basis that the impacts would be permanent to reflect the time period over which they would be experienced.

5.22. WLDC considers that the application should be determined on the basis that the impacts of the OESF on communities and the environment are permanent in planning terms.

Landscape and visual

5.23. WLDC raises objections to the Scheme due to its cumulative impact, alongside other NSIP solar projects, on landscape character and the visual effects people will experience in the district.

5.24. WLDC notes that the applicant has provided a drawing that identified the approximate location of other projects through numbered circles (Figure 18.9 / Drawing Number EN10159/APP/6.20/18.9). Whilst serving as a useful reference, WLDC wishes to see a drawing that shows the true extent of solar farm coverage in the area. Were such a drawing produced with, for example, the Order Limits/red-line boundaries of other projects shown, the extend of land lost to solar farm development and the proximity to each other would be revealed. WLDC considers that this exercise is required in order for the cumulative impacts of the OESF project to be properly considered. WLDC request that proposed large vehicle and AIL routes are included in this drawing or set of drawings, along with context background mapping showing flood risk zones and agricultural land classification.

Landscape Character

5.25. WLDC consider that it is essential that, when considering the acceptability of the Scheme, it must be done so with regard to the cumulative impact with other solar NSIP projects either consented or awaiting decision in the area.

5.26. NPS EN-3 (paragraph 2.10.257) states that the Secretary of State will consider the landscape and visual impact of any proposed solar PV farm, taking account of the effect of the development on landscape character, together with the possible cumulative effect with any existing or proposed development.

5.27. CLLP Policy S14 states that renewable energy schemes will be supported where impacts on landscape character and visual amenity are acceptable. To establish compliance in terms of 'acceptability', the impacts must be tested against other applicable policies in the Local Plan.

5.28. Policy 53 is an applicable policy that must be satisfies to comply with Policy S14. S54 requires all development to achieve 'high quality sustainable design that contributes positively to local character, landscape and townscape, and supports diversity, equality and access for all' and that 'good design will be at the centre of every development proposal…'. Policy S53 provides a range of criteria for projects to demonstrate compliance which, although written in a form that relates to a wide range of developments, it includes policy that relates to the OESF proposal including;

- Integrating into its surroundings;
- Relating well to a site's local and wider context to enhancing existing character and distinctiveness to ensure development can satisfactorily assimilated into the surrounding area;
- Enhancing existing character;
- Making effective and efficient use of land;
- Incorporate and retain as far as possible existing natural features;
- Minimise the need for resources both in construction and operation

5.29. In assessing compliance with the above criteria, the supporting ES does not provide an assessment beyond a study area boundary of 2km. As a consequence, there is no formal assessment of the magnitude of the cumulative landscape character change within the West Lindsey District.

5.30. The landscape of West Lindsey is characterised by the large, open agricultural fields. In planning policy terms Local Plan Policy S1 determines that the entire Order Limits within WLDC are in "Countryside". The implementation of the cumulative solar farm projects will have a marked change on that landscape character area, being wholly contrary to the defining and valued character of the Till Vale landscape character area.

5.31. The erosion of this landscape through the quantum of development being imposed is unprecedented and will cause material harm for over 60 years. The impacts will not be assimilated into the landscape

5.32. The extent and amount of land that will host alien solar farm development within the district, coupled with the lack of assessment, fails to comply with NPS EN-1 and CLLP policies S14 and S53.

Visual effects

5.33. The OESF will be experienced as part of cumulative series of NSIP scale solar farms within the district. It will represent the first project encountered when travelling into the district from the south-east, following which the spread of solar farm development extends beyond Gainsborough to the northern extent of the Cottam Solar Project (a distance of circa. 24km/15 miles)

5.34. The sequential experience of solar farm infrastructure by communities and visitor travelling through the landscape will be harmful, with travellers experiencing a feeling of solar farm

"fatigue" and with increasingly limited visual relief spanning distance of over 13 miles. The OESF will add to the existing impacts extending the area of impact.

5.35. The cumulative impact caused by the addition of the OESF to the cumulative projects represents a clear tipping-point to which the landscape character is unable to reasonably accommodate further change as a consequence of solar farm development.

5.36. The OESF does not comply with relevant NPS' and nor the CLLP policy with regard to its impacts on landscape character and visual effects.

Construction traffic

5.37. The impact and management of cumulative construction traffic has been an issue that WLDC has consistently raised as a significant concern.

5.38. NPS EN-1 recognises that NSIP proposals can have a variety of substantial impacts on the surrounding transport infrastructure (para. 5.14.1). The Secretary of State should seek to ensure that the mitigation of transport impacts, including during construction, have been considered (para. 5.14.18).

5.39. NPS EN-1 further states that, where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the Secretary of State should consider requirements to mitigate adverse impacts on transport networks arising from the development (para. 5.14.19)

5.40. NPS EN-3 states the importance of assessing various potential routes to the Order Limits for the delivery of materials and components during the construction period and the suitability of access roads for construction vehicles.

5.41. Paragraph 115 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. It also states that development should minimise the scope for conflict between pedestrians, cyclists and vehicles.

5.42. The Scheme proposes two construction vehicle access routes to the site (APP-136, 6.21 Appendix 12.2 Transport Assessment, Figures 3-1 and 3-2).

5.43. Proposed Access Route 1 begins at ABP Immingham, and uses the A180, M180, A15, A46, A57 and A1133 to access the site.

5.44. Proposed Access Route 2 begins at Goole Docks and proceeds to the site using the A161, M62, M18, A1(M), A1 and A57 to access the western site access.

5.45. The cumulative projects Gate Burton, Cottam, West Burton and Tillbridge solar farm NSIPs all utilise the A15 for the delivery of construction traffic.

5.46. The OESF project does not assess the additional construction traffic that it will impose on the local highway network cumulatively with the other NSIP solar projects. This is particularly relevant when considering the impacts of construction traffic using the A15, which is a highway also to be used by other solar projects. The OESF, Gate Burton, West Burton, Cottam and Tillbridge solar projects will all be utilising the A57.

5.47. It is therefore very clear that construction traffic associated with multiple NSIP scale solar farm projects could be using the A15 and the A57 during the same periods.

5.48. The reason given by the applicant in excluding the Cottam Solar Project and the Tillbridge Solar Project from a cumulative assessment was that it would not coincide with the same construction period as the OESF. This assertion is incorrect as the five-year lifespan of the DCOs either granted, or sough to be granted, would allow for all of the projects to be constructed at the same time. As none of the consented NSIP solar farms have even yet to submit details to discharge their 'requirements' the likelihood of concurrent construction traffic using local highways increases.

5.49. As data for all cumulative projects is in the public domain, an assessment of the potential cumulative traffic impacts should be carried out. As submitted, there is insufficient detail to robustly assess these impacts.

5.50. Should the applicant amend their application by committing to using Proposed Access Route 2 only, the adverse cumulative impacts along the A15 and the A57 within the West Lindsey District would be avoided. Such a commitment would minimise the impacts upon communities in terms of disruption, noise and air quality impacts, and additional traffic management that could extend for a period of 5-10 years should all five NSIP projects overlap/stagger their construction phases.

5.51. The developers promoting the other solar NSIP projects of Gate Burton, Cottam, West Burton and Tillbridge, worked collaboratively to produce a 'Joint Report on Interrelationships'. This report set out the respective impacts of each project, including cumulatively, and provided commitment to joint working to minimise impacts during construction. This included construction traffic. The OESF has not engaged, however, with other developers and there remains no commitment to work collaboratively to minimise impacts for communities and visitors.

5.52. The potential cumulative impacts of construction traffic on the amenity of local residents and visitors, and the lack of full assessment and commitment to collaborative working with cumulative projects falls contrary to NPS EN-1 and CLLP Policy S47.

Tourism

5.53. WLDC considers that there is potential for the proposal to have a negative impact upon the tourism economy within the West Lindsey District.

5.54. NPS EN-1 states that the Secretary of State should have regard to the socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the Secretary of State considers to be both relevant and important to its decision (para. 5.13.9).

5.55. The cumulative impacts of all of the NSIP solar projects in the district during construction upon tourist accommodation availability and reducing the attractiveness of the area for visitors is a key concern and an adverse impact.

5.56. The likelihood of construction phase of the five NSIP projects occurring concurrently, potentially up to a period of between five and ten years, will result in the current tourist accommodation being saturated to meet this demand.

5.57. This would have an adverse impact upon the tourism sector through the reduction in the availability of accommodation for tourists and visitors to the West Lindsey district. Due to the potential lengthy cumulative construction period of a number of years, the ability for tourist accommodation businesses to recover once construction is complete is unknown and it is feared it would take significant time to do so.

5.58. The tourist industry is already engaged in recovery following the impacts of Covid 'lockdown' periods and requires capacity for tourists to re-establish growth.

5.59. Whilst the influx of construction workers using existing accommodation could be deemed to have a temporary positive economic impact, it does not take account of the wide linked-industry benefits that is inherent to the tourism sector. Visitors to the district staying in local accommodation will also, for example, visit local destinations, attractions, events and local services.

5.60. With construction traffic and associated works being carried out during the summer months and clashing with peak agricultural traffic (harvest) and the Lincolnshire Show, visitors and tourists will experience considerable frustration particularly those using the A15 and the nearby highway network.

5.61. The availability of accommodation for visitors to the district are likely to be significantly reduced over a long period of time during the construction phases of the five NSIP projects cumulatively. This will have an adverse impact upon the wider tourist sector in the district, materially affecting its ability to recover from the 'Covid' period and achieve growth ambitions.

5.62. The effects on the tourist economy will be contrary to the intended aims and principles of Local Plan Policy S43, which seek to promote sustainable rural tourism.

Agricultural land

5.63. The significant impacts caused by the cumulative loss of agricultural land available for the production of food.

5.64. Paragraph 5.11.12 of the NPS (EN-1) outlines that 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) except where this would be inconsistent with other sustainability considerations*".

5.65. Under Paragraph 5.11.34 of the NPS (EN-1), the decision maker should ensure that "*applicants do not site their scheme on the best and most versatile agricultural land without justification The SoS should also 'take into account the economic and other benefits of that land*".

5.66. The NPPF also states that BMV is land in grades 1, 2 and 3a of the Agricultural Land Classification and recognises the economic and other benefits of such land (para. 187). Footnote 65 states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

5.67. Policy S67: Best and Most Versatile Agricultural Land of the CLLP 2023 states that significant development resulting in the loss of the best and most versatile agricultural land will only be supported if:

- The need is clearly established;
- The benefits outweigh the need to protect such land, when taking into account the economic and other benefits of the best and most versatile agricultural land;
- The impacts of the proposal upon ongoing agricultural operations have been minimised through the use of appropriate design solutions; and

- Once the development has ceased its useful life then the land should be returned to its former use.

5.68. WLDC wishes to emphasise the importance of preserving agricultural land, particularly Best and Most Versatile (BMV) land, in line with national and local planning policies. The council expects that any development on such land must demonstrate clear economic value to the district and ensure restoration to its original agricultural use. This is crucial given the land's contribution to the local economy, environment, and cultural identity.

5.69. The proposed OESF (solar farm) project involves the loss of agricultural land classified as Grades 2 and 3a—categories considered BMV. Although the grazing of livestock alongside solar panels is technically considered food production, WLDC argues that this alone is insufficient to meet policy requirements unless it is clearly demonstrated that the land will remain genuinely accessible for agricultural tenants throughout the project's 60-year lifespan.

5.70. Unlike other Nationally Significant Infrastructure Projects (NSIPs), which have largely avoided BMV land, the OESF proposal places significant infrastructure—including solar panels, a substation, and a battery energy storage system (BESS)—directly on high-quality agricultural land. This approach, according to WLDC, fails to prioritize the protection of valuable farmland and disregards planning policy preferences.

5.71. The cumulative effect of removing substantial areas of productive land from food production is seen as a significant and unacceptable negative impact. WLDC concludes that the scheme does not adequately mitigate or justify the loss of BMV land and therefore does not align with established planning principles.

Maintenance and replacement

5.72. WLDC has significant concerns regarding unassessed environmental impacts associated with the long-term maintenance of the OESF solar project, particularly regarding the replacement and disposal of infrastructure components such as solar panels and battery energy storage systems (BESS). The draft Development Consent Order (dDCO) grants broad powers for maintenance, allowing piecemeal replacement of components over the project's 60-year lifespan. While individual replacement events may fall below Environmental Impact Assessment (EIA) thresholds, their cumulative effect could be significant.

5.73. WLDC notes that solar panels typically require replacement after around 20 years, and BESS will also need full replacement. However, there is currently insufficient recycling capacity in West Lindsey, Lincolnshire, or even the UK to manage this waste. The application documents lack clarity on how replaced materials will be handled or recycled, and no baseline or future recycling strategy is provided. This is contrary to Local Plan Policy S10.

5.74. Given that multiple Nationally Significant Infrastructure Projects (NSIPs) may follow similar replacement patterns without oversight, WLDC is concerned about the potential for adverse environmental and community impacts. The council calls for greater transparency and control over maintenance-related waste to ensure long-term sustainability and compliance with environmental standards.

One Earth Solar Project – individual project impacts

Need case

5.75. WLDC acknowledges the urgent need to deploy infrastructure for the generation of electricity from renewable sources as set out in NPSs EN-1 and EN-3.

5.76. The principle of deploying renewable energy generation infrastructure is also supported by policy S14 of the Central Lincolnshire Local Plan 2023.

5.77. WLDC recognizes the OESF as a 'Critical National Priority' (CNP) under NPS EN-1, which typically means the need for such projects outweighs residual effects. However, WLDC argues that the cumulative impacts of this project, combined with four other NSIP solar projects in West Lindsey, are 'exceptional'. These impacts will last at least 60 years and significantly alter the district's landscape character, creating a solar farm landscape throughout the district that will be experienced by residents and visitors. WLDC emphasises that this situation is unprecedented, with no other DCO decision having to consider such extensive cumulative impacts during construction, operation, maintenance, and decommissioning. The eradication of the existing landscape character over such a large area is deemed 'exceptional' by WLDC, and we believe this must be taken into account when assessing the project's acceptability against policy, particularly due to its unique and significant cumulative impacts on the landscape.

Project design

5.78. West Lindsey District Council (WLDC) has reviewed the design approach of the OESF solar project, as outlined in the submitted documents, including the ‘Design Approach Document’ and ‘Outline Design Parameters’. While national policy (NPS EN-1) and local policy (S14) both emphasize the importance of good design in renewable energy developments—particularly in mitigating adverse impacts on landscape and visual amenity—WLDC finds the OESF design lacking in this regard.

5.79. The council acknowledges that solar farms often require specific site characteristics, but stresses that developers must still minimize visual and environmental impacts. However, the OESF project places solar panels, a substation, and a battery energy storage system (BESS) up to 13.5m high, according to the height parameter plans [APP-016], in highly visible locations, including a large open field east of the A1133. These installations are clearly visible from within West Lindsey and the neighbouring Newark and Sherwood District, raising concerns about their visual prominence and the lack of integration with the surrounding landscape.

5.80. WLDC argues that the design fails to demonstrate how national and local design policies were meaningfully applied. The placement of large infrastructure on open, high-quality agricultural land—areas that policy suggests should be avoided—reflects a flawed design strategy. The council believes that better design choices could have reduced the visual and environmental impact, such as placing bulkier infrastructure in less exposed areas or using natural features for screening.

5.81. Additionally, the layout places solar panels directly up to field boundaries, creating a harsh visual edge and reducing the landscape’s natural character. WLDC expected the design to include buffer zones to soften the visual impact and preserve the prominence of field boundaries, especially from key viewpoints like the A1133 and nearby public rights of way.

5.82. In conclusion, WLDC finds the current design approach inadequate in addressing landscape and visual concerns and believes alternative design strategies could have significantly reduced the scheme's adverse impacts.

Landscape and visual

5.83. West Lindsey District Council (WLDC) has expressed significant concerns regarding the landscape and visual impacts of the proposed OESF solar farm. The council believes the development will result in substantial and adverse effects on the district's landscape character and visual amenity, affecting both local communities and visitors.

5.84. In assessing these impacts, WLDC has referred to national policy statements NPS EN-1 and EN-2, as well as the adopted Local Plan. NPS EN-1 acknowledges that most nationally significant infrastructure projects will have some adverse landscape effects but stresses the importance of careful design to minimise harm. It requires developers to consider siting, operational constraints, and mitigation measures. Similarly, Local Plan Policy S14 mandates that renewable energy proposals must demonstrate that their direct, indirect, individual, and cumulative impacts are acceptable, particularly in terms of scale, siting, and design.

5.85. WLDC argues that the OESF project fails to meet these standards. The substation and battery energy storage system (BESS) are proposed in highly visible, open locations within West Lindsey, while solar panels are sited close to field boundaries and public highways. This layout results in infrastructure that is visually intrusive and inconsistent with the rural character of the area.

5.86. Specific viewpoints highlight these concerns. From Viewpoint 2a, located on higher ground to the west, the solar panels will interrupt long-distance views toward Lincoln Cathedral—a Grade I listed building—within one of the most sensitive landscape character areas identified in the West Lindsey Landscape Character Assessment. Viewpoint 4, from the A1133 site entrance, reveals plans for a solid wooden fence that WLDC considers inappropriate for the rural setting, further degrading the landscape during the multi-year construction period.

5.87. The eastern BESS area is identified on the height parameter plans [APP-016] as having a maximum height of 13.5m. It should be noted that, according to plans submitted by Anglian Water for the works currently being undertaken at the Hall Water Treatment Works, immediately northwest of and adjacent to the eastern BESS area, the current main (and highest) building on the water treatment works site is approximately 10m in height to its ridge. This is currently the highest structure for some considerable radius. Assuming the 13.5m maximum height indicated on the plans will extend across the majority of the BESS area, the BESS area would be a major new element in the countryside, akin in scale to distribution warehousing.

5.88. Moreover, given the height parameter plans indicate that the height of development within the BESS area could be up to 13.5m, this would be a substantive impact on the view towards Lincoln Cathedral from viewpoint 2a.

5.89. The introduction of solar panels, the substation, and BESS into large, open agricultural fields will erode the area's openness and rural identity. The dark, solid appearance of the panels will be particularly noticeable from the A1133 and nearby public rights of way, creating a stark contrast with the existing landscape.

5.90. Viewpoint 24 looks northwards along the Trent Valley LCA. As the Landscape Character Assessment indicates (page 19) development on the low lying west of the A1133 would be prominent and not easily accommodated without detracting from the gentle transition to the

open, flat farmland on the banks of the River Trent. WLDC is of the view that the proposal will create such a prominent development feature which would be clearly visible in the landscape.

5.91. WLDC questions why the project has not been designed to minimise these effects, especially given the visibility of the site from elevated public viewpoints. The council believes that alternative design choices could have significantly reduced the visual and landscape impacts.

5.92. To address these concerns, WLDC recommends several mitigation measures:

- Increasing the setback of solar panels from the A1133 boundary.
- Relocating the substation and BESS further east, onto lower ground and closer to existing woodland, to reduce visibility.
- Enhancing the western site boundary with additional tree and hedgerow planting using native species such as maple, hawthorn, ash, and oak. This planting should be implemented through the Landscape Environmental Management Plan (LEMP) and ensure continuous screening, particularly near gaps like the layby south of the site entrance.

5.93. In conclusion, WLDC maintains that the OESF project, as currently designed, will cause significant and avoidable harm to the landscape character and visual amenity of the West Lindsey District. The council urges the applicant to revise the design and implement stronger mitigation measures in line with national and local policy requirements.

Agricultural land

5.94. WLDC strongly objects to the proposed loss of agricultural land—particularly Best and Most Versatile (BMV) land (classified as Grades 2 and 3a)—as part of the OESF solar farm development. The council argues that the scheme would result in the long-term removal of approximately 660.9 hectares of high-quality farmland from food production, which it considers a significant and adverse impact.

5.95. National Policy Statement (NPS) EN-3 advises that solar projects should avoid BMV land where possible, favouring lower-grade land. Similarly, Local Plan policies S14 and S67 reinforce the need to protect BMV land, only permitting its use when strict criteria are met. These include demonstrating a clear need for the development, proving that no suitable lower-grade land is available, and ensuring that the benefits of the proposal outweigh the loss of productive land. Additionally, any development should minimise disruption to ongoing agricultural operations and commit to restoring the land after the project ends.

5.96. WLDC contends that the OESF application fails to meet these requirements. The applicant has not sufficiently justified why BMV land must be used, particularly for infrastructure like the battery energy storage system (BESS), when lower-grade land is available nearby. The justification offered—primarily the national need for renewable energy and the project's 60-year "temporary" lifespan—is seen by WLDC as inadequate. The council argues that a 60-year period is effectively permanent in terms of agricultural impact, removing land from food production for multiple generations.

5.97. Furthermore, WLDC believes the project could have been designed more sensitively to avoid BMV land without compromising its contribution to national renewable energy targets. The council maintains that the current approach disregards both national and local planning policy and represents a missed opportunity to balance energy development with long-term food security and agricultural sustainability.

Flood risk and the water environment

5.98. WLDC are concerned that the proposal within the administrative area falls into Flood Zone 3 in two major locations. The first location is the area between the River Trent and the Hall Water Reservoir. Although detailed information of what is proposed at this location have not been provided, it appears that this area will be used for the horizontal directional drilling to provide for the export cables to cross under the River Trent.

5.99. The second location where the project falls within Flood Zone 3 is east of the A1133. This area is east of Southmoor Lane and extends either side of the Sewer Drain watercourse.

5.100. The proposed development is classed by the Government in Annex 3 of the NPPF as 'Essential Infrastructure' and development within Flood Zone 3 requires both the sequential test and, if the sequential test is met, then the exception test is required.

5.101. EN-1 makes clear at paragraph 5.8.7 that new energy infrastructure with flood risk areas should be exceptional: *"Where new energy infrastructure is, **exceptionally**, necessary in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), policy aims to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing flood risk overall. It should also be designed and constructed to remain operational in times of flood."*

5.102. The applicant has undertaken a site search and considered alternatives in a 10km radius around High Marnham (paragraph 3.2.10 of the Planning Statement [APP-168]. Table 4.1of the Planning Statement indicates that "*Approximately half of the Order Limits is located in Flood Zone 1 and the remainder is located within Flood Zone 2 and Flood Zone 3*". However, when considering the Order Limits east of the River Trent, as shown on Environmental Statement Figure 7.3 [AS-055], approximately 50% of this area is in Flood Zone 3.

5.103. The applicant has undertaken a search within a 10km radius of High Marnham, which according to paragraph 10.1.15 of the Planning Statement [APP-168]. However, this is not justified beyond "the desire to be as close to the point of connection as possible". It is not clear why other radii, such as 12km or 15km did not also fulfil that requirement, nor whether such a search would have identified sites outwith Flood Zone 3. It is also the case that, given the compulsory purchase powers available with a DCO, WLDC do not consider that the sequential test needs to be restricted by sites which are "reasonable available".

5.104. A significant proportion of the panels located in WLDC will be in Flood Zone 3 and may be submerged by up to 600mm, even though they are raised significantly with the bottom of the panels being 1.1m compared to the panels not in flood zone 3. Additionally, the top of the panels in flood zone 3 is 300mm higher than those panels not in Flood Zone 3. Overall, this raises the height of the development in an area designated as countryside in the Local Plan.

5.105. The proposal adds infrastructure to Flood Zone 3. Whilst ES Chapter 7: Hydrology and Hydrogeology [APP-036] indicates at paragraph 7.5.11 that the modules will be strong enough to withstand debris impact, there does not appear to be an assessment of the implications for downstream receptors of a catastrophic failure of a proportion of the modules, in terms of increasing the risk to others. This would seem especially relevant where the flood height is forecast in assessment to be higher than the 1.8m raised base of the panels. This also applies to construction period where it is not apparent that any assessment has been undertaken of the associated flood risks. Local Plan Policy S21 requires a demonstration by applicants that development will be safe during its lifetime. National Policy Statement EN1 requires at paragraph 5.8.11 that it should be demonstrated that "the project will be safe for its lifetime taking account of the vulnerability

of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall".

5.106. WLDC note that the proposal does not show provision for an 8m area either side of watercourses. This has the potential to restrict access for maintenance of the watercourse and thus the potential to increase flood risk elsewhere. This is contrary to Local Plan Policy S21.

It is not apparent that the applicant has engaged with the Trent Valley Internal Drainage Board, particularly with reference to the 'Sewer Drain' watercourse that runs north south through the eastern part of the NSIP development boundary (referred to in ES Chapter 7: Hydrology and Hydrogeology [APP-036] as the "Unnamed Eastern Ordinary Watercourse"). WLDC request that the applicant submits a Statement of Common Ground into the examination covering this party.

Traffic and transport

5.107. WLDC raises significant concerns regarding the impacts of construction traffic on its communities and environment.

5.108. As discussed above, the cumulative impact of the addition of construction traffic generated by the OESF to the same highway network being used by four other NSIP solar projects will give rise to significant traffic management, delay and frustration over a period that could stretch between five and ten years.

5.109. WLDC considers the use of the 'Proposed Access Route 1' which begins at ABP Immingham, progresses on the A180/M180 onto the A15 south, and then to A46 at Lincoln and using the A57 to the site, to give rise to significant impacts. This is both in terms of the impacts cumulatively, and the impacts of the OESF individually in using local roads through the West Lindsey district to access the site in it south-western corner.

5.110. WLDC considers that the Scheme should use 'Proposed Access Route 2' as a route for construction traffic. Such an approach would utilise major motorway and A-class roads, minimising the use of local roads to access the site,

5.111. WLDC also question why the Scheme appears to propose on the Indicative Layout (EN010159/APP/2.9 rev 1) two construction access points in close proximity to each other from the A1133 into the eastern part of the site. There does not appear to be a compelling reason to remove hedgerows forming the field boundary to create this access. The use of a single access would minimise the environmental harm caused and WLDC would welcome such an amendment to the OESF project. The Transport Assessment (Appendix 12.2 EN010159-000179-6.21) identifies the northernmost access as "Gate F", but the access immediately adjacent the Anglian Water Works is not shown. WLDC considers this needs to be clarified.

5.112. Figure 2.1 of the Outline Construction Traffic Management Plan [APP-181] and figure 4 of Environmental Statement Appendix 12.2 Transport Assessment [APP-136] contain the same figure, showing a construction access 'Gate G' running westwards from the A1133, north of the Anglian Water reservoir. The DCO limits are tightly drawn here to include just the existing single-track access and a small verge, which is approximately 6m in width, from the boundary fence for the Anglian Water reservoir, to the field boundary hedge.

5.113. Gate G is the only access to works east of the River Trent and west of the A1133. These works include the installation of 13 hectares of solar panels and the horizontal directional

drilling for the export cable to run under the River Trent. The application documents do not appear to have specified the expected vehicle numbers using this access. However the access is directly on to a main A class road, which has a national speed limit of 60 miles per hour.

5.114. The Gate G access is directly opposite the existing access for the Anglian Water Hall Water Treatment Works. Given a maximum 6 metre width without removing the field boundary hedgerow there does not appear to be enough width for two large goods vehicles to pass each other on the access road. This has the potential, if a large goods vehicle is leaving the site, for the need to an incoming vehicle to need to wait on the carriageway of the single carriageway A class road with a 60 miles per hour national speed limit for the vehicle to exit.

5.115. The transport assessment indicates in Table 5 that HGV traffic on the A1133 north of north Clifton will increase during the project construction phase by 9.9%.

5.116. It should also be noted that, although the road appears generally level, there is in fact a significant dip in the road with the dip reaching its nadir around Gate G. This dip obscures the view from traffic approaching from the south. There is also a right-hand bend in the road approximately 350m north of Gate G which also has the potential to obscure traffic waiting on the A1133 in the vicinity of Gate G. Additionally southbound traffic will have passed Gate F immediately to the north of this bend.

5.117. WL Local Plan Policy S47 states that any development that has severe transport implications will not be granted planning permission unless deliverable mitigation measures have been identified, and arrangements secured for their implementation, which will make the development acceptable in transport terms.

5.118. DC requests that further consideration is given to the road safety aspects associated with Gate G, and its location on the A1133, opposite the existing Anglian Water Treatment Works access, on a road subject to the national speed limit.

Tourism

5.119. WLDC identifies significant potential impacts on the tourism sector within the district as a consequence of the scheme. WLDC considers that there will be a long-term impact on tourism as a result of the Scheme during the construction phase.

5.120. The visitor economy is a significant and growing sector within West Lindsey. The area is an attractive, peaceful rural area which combines an outstanding natural environment with historic villages in close proximity to the City of Lincoln. Lincolnshire's visitor economy is worth £2.4bn (STEAM data Lincolnshire County Council), with the sector supporting 30,000 jobs and a far-reaching supply chain across the county. Food and drink spending alone generates £44m into the local economy, with recreation adding £18m and retail contributing £59m. The visitor economy is a significant sector for people's livelihoods.

5.121. The impact of Covid lockdowns has been severe. Lincolnshire has experienced a 52% reduction in all tourism spending (STEAM data 2020), with full time jobs being reduced by half from 2,500 jobs to just over 1,200. There has been a 52% reduction in visitor numbers and a 50% reduction on the number of visitor days. Food and drink spend feel from £44m to £21m (reduction of £13m) and retail spend fell from £59m to £29m 9a reduction of £20m). Recreational spend reduced by £10m to £8m. Overall, local tourism businesses have experienced a reduction of over £100m from their revenue.

5.122. Reflective of the defining agricultural character and culture of West Lindsey, one of the key tourist events is the Lincolnshire Show, held annually at the Lincolnshire Showground. The show is a flagship event for the area, with over 60,000 visitors and 500 exhibitors each year. The success of the Lincolnshire Show is strongly reliant upon the local tourism sector accommodating the visitor demand it creates.

5.123. Forecasts have predicted that it will take a timescale of up to 2025/26 for businesses in the sector to recover to pre-Covid levels, based on the assumption that no material externalities will compromise this recovery.

5.124. The influx of construction workers will materially decrease the availability of tourist accommodation, which will be further exacerbated on a cumulative basis with other DCO solar projects within West Lindsey.

5.125. The significant reduction in the availability of tourist accommodation will, in WLDC's view, result in visitors seeking accommodation in different parts of the region, which will have a direct and indirect effect on tourism in the district.

5.126. Once the construction period for all projects is complete (which will occur for a number of years), there is no certainty that the tourism sector will recover to its former level and, if so, how long this would take.

5.127. The OESF project will have a significant negative impact on the local tourism sector, causing damage to its image and recovery.

Cultural heritage

5.128. The Royal Observer Corps Roman Fort Scheduled Monument (List Entry Number 1003608) is located to the west of the OESF Order Limits. The Scheduled Monument is a 1st century Roman vexillation fortress sitting upon the ridge to the east of the River Trent. To the south lies the remains of two Romand marching camps and, immediately to the north, lies a Royal Observer Corps Monitoring Post. The purpose of the designation is due to the importance of

5.129. The monument is designated for the following reasons:

Period: the fortress and camps date from the 1st century AD, during the military conquest of Britannia by the Roman Army, and are highly representative of this initial phase of the Roman conquest and occupation of Britain;

Rarity: Vexillation fortresses form a rare subset of Roman defensive sites;

Survival: Three sides of the fortress survive, complete with outworks and internal features. The two camps survive as the northern arm of the defensive circuit;

Potential: The fortress and camps remain unexcavated and contain considerable potential to inform on the nature of the Roman Army in the early days of the occupation of Britannia.

5.130. The Infrastructure Planning (Decisions) Regulations 2010 requires decision makers to have regard to the desirability of preserving the setting of a scheduled monument.

5.131. Section 5.9 of NPS EN-1 recognises that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic

environment. The historic environment incudes all aspects of the environment resulting from the interactions between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, landscapes and planted or managed fauna.

5.132. NPS EN-1 requires Applicants to fully assess the significance of heritage assets affected by a proposed development and ensure that the extent of the impact can be adequately understood from the application and its supporting documents (para. 5.9.12).

5.133. In decision making, NPS EN-1 states that the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by a proposed development, including development affecting the setting of a heritage asset (para. 5.9.22). In considering the impact of a proposed development on any heritage asset, the Secretary of State should give considerable important and weight to the desirability of preserving all heritage assets, with any harm or loss of significance requiring clear and convincing justification (para. 5.9.28.

5.134. Where substantial harm (or total loss of significance of) a designated heritage asset (including scheduled monuments), the Secretary of State should refuse consent unless it can be demonstrated that the substation harm to, or loss of, significance is necessary to achieve substation public benefits that harm or loss (para. 5.9.31)

5.135. Where a proposed development will lead to less than substantial harm to the significant of the designated heritage asset, this harm should be weighed against the public benefits of the proposal (para. 5.9.31)

5.136. NPS EN-3 provides specific policy relating to the impacts of solar PV generation project on the historic environment (Section 2.10). Key policy stated includes:

- Solar PV development on the historic environment will require expert assessment in most cases and may have effect both above and below ground (para. 2.10.107);
- As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which, depending on their scale, design and prominence, may cause substantial harm to the significance of the asset (para. 2.10.118).

5.137. CLLP Policy S57 requires development to protect, conserve and seek opportunities to enhance the historic environment. In instances where a development proposal would affect the significance of a heritage asset (both designated or non-designated), including any contribution made by its setting, the applicant will be required to describe and assess the significance of the asset, including its setting; identify the impact of the proposed works on the significance and special character of the asset, including its setting; and provide a clear justification for the works so that the harm can be weighed against public benefits.

5.138. The applicant has carried out an assessment of the impact of the Scheme on the Scheduled Monument. The assessment concludes that there would be a very low magnitude of impacts to the wider setting of the Scheduled Monument, which is a minor neutral effect (not significant) in the short and medium term. This conclusion is reached due to the assessment view that the solar arrays would be low-lying and the strategic role of the asset in the landscape would remain.

5.139. Notwithstanding the conclusions of the applicant's assessment, the OESF would be readily visible from the asset, which would have an adverse impact upon the view outwards to the east. This will include solar panels and potentially the substation and BESS.

5.140. Due to the historic function of the asset, its relationship with the surrounding landscape is considered to be an important part of its setting. To assist with understanding the impact in this regard, it is considered that an additional viewpoint should be provided from the observer corps. post, as it represents a designated viewpoint that utilises the same topography as the fort, contributing to its significance. This view has also been expressed by Historic England.

5.141. Whilst there the conclusions reached by the applicant are not contended at this stage, the submission of this further information would enable a robust assessment to be made against relevant policy to determine the acceptability of the Scheme's impacts on the Scheduled Monument.

Maintenance, replacement and decommissioning

5.142. It is not clear to WLDC how the replacement of infrastructure (project components) has been accounted for in the assessment. The assessment does not justify or reason the degradation rates or whether degradation could be accelerated by climate change.

5.143. Being unable to identify the likely failure rate of panels and the requirement to replace BESS and substation infrastructure during the lifespan of the consent, leaves the potential likely impacts during the operational phase unclear.

5.144. The wide scope of the definition of 'maintenance' in the dDCO has the effect of allowing a developer to replace a whole NSIP project over its lifespan. The application states that panels, BESS and other associated development will need to be replaced at least once during the project, which have the potential for significant adverse environmental effects. This will be exacerbated when the need to re-place and re-construct applies to all four NSIPs cumulatively.

5.145. WLDC note that in the Solar Road Map (2025) the Government commits to "*hold a roundtable bringing together academia, the solar industry, waste sector and relevant government departments and organisations to gain a greater understanding of the decommissioning dates for current UK solar panels and likely availability of current conventional and emerging innovative solar panel recycling practices*". However, the OESF development likely to undertake replacement of equipment on a cycle that predates substantive action by Government. Therefore, the issues associated with recycling need to be considered as part of the consideration of this application.

5.146. There remains no mechanism for WLDC to consider the impacts of 'maintenance' and place any controls on what will be decommissioning and construction activity throughout the operations phase of the Scheme. The application is unclear in providing details on the approach to managing waste from 'maintenance' activities.

5.147. The current proposals for decommissioning include the retention in the ground of the majority of the export cables. WLDC requests further information on the assessment of the environmental effects of cable retention in perpetuity, including the deposition and migration of microplastics.

5.148. Local Plan Policy S10 states that proposals will be supported where they demonstrate their compatibility with, or the furthering of, a strong circular economy in the local area (which

could include cross-border activity elsewhere in Lincolnshire) will be supported. It is not considered that this proposal does that at present.

BESS & fire safety

5.149. WLDC acknowledges the Outline Battery Safety Management Plan [APP-183] submitted as part of the application to identify the fire safety risks associated with the BESS and to explain the measures proposed to mitigate those risks.

5.150. WLDC maintains concerns regarding the risk of fire from BESS infrastructure and the effectiveness of processes to ensure that events are avoided and/or dealt with in a manner that provides a high level of protection to communities and the environment.

5.151. WLDC expects the applicant to work closely with Lincolnshire Fire and Rescue Service to provide all necessary information regarding the installation of the Scheme, including site design features, to facilitate hazard and risk analysis studies. Such engagement should also ensure that comprehensive risk management and emergency response plans are developed, to be achieved through the sharing of detailed site designs at as early a stage as possible.

5.152. Due to the importance of this risk to the communities and environment in the district, WLDC requests that it is included as a consultee body in the approval of the dDCO requirement number 7 'Battery safety management plan'.

WLDC Values

5.153. WLDCs 'Vision', established through its Corporate Plan 2023-2027, is "*West Lindsey is a great place to be where people, businesses and communities can thrive and reach their full potential*". The WLDC 'vision' is to be achieved through the implementation of 'Core Values', which includes 'To have integrity in everything we do'.

5.154. The above 'vision' and 'values' apply to all WLDC activities and responsibilities, including planning related duties. With regard to its role as a relevant Local Authority for the examination and determination of the OESF project, WLDC wishes to ensure that the proposed development, if consented, would be constructed, operated and decommissioned in a manner that satisfies those values.

5.155. WLDC would welcome confirmation from the applicant, OESF, that all aspects of the project, including organisation values, use of human resources, supply chain management and approach to engagement with local communities will be governed by appropriate values and ethics.

Community benefits

5.156. WLDC note that the Solar Road Map published by the government in June 2025 indicates that the government is proposing to make it mandatory for developers of low carbon infrastructure (including solar) to provide community benefit funds. A consultation was held in May and June 2025 relating to this. WLDC also note that Solar Energy UK will publish a Community Benefits Protocol. Despite this, WLDC is concerned that there appears to be scant information on the developer website or within their documents which allude to any direct community benefits. In this context WLDC wishes to ensure that a community benefit fund is established for the OESF, and that the fund is distributed proportionally between the relevant communities, with particular regard to the cumulative effects of the OESF and other solar NSIP projects in the WLDC area.

Grid Connection

5.157. WLDC note that the connection to the national grid at High Marnham does not form part of the NSIP and is to be the subject of a separate planning application by National Grid Electricity Transmission to be submitted later in 2025. WLDC are concerned that there is the possibility that the OESF will be granted a DCO whilst the grid connection is yet to be consented. To that end WLDC request a 'Grampian style' Requirement is added to the OESF DCO such that the OESF DCO cannot be implemented until the planning permission for the grid connection has been granted.

Operational land and permitted development

5.158. With reference to action point 4 on the Actions arising from the ISH1 held on the 9 July 2025, WLDC does not consider that the article of the DCO which grants 'operational land' status to the full extent of the development included in the DCO for the duration of the 60 year life of the project (article 38) is necessary or justified. There is no justification for this definition to encompass any land identified for Work 8 - works to create, enhance and maintain green infrastructure and mitigation.

5.159. WLDC also considers that operational land status is not appropriate for land outwith land used for the solar panel, substation or BESS. This is because, once complete, the export cable will be underground and without any above ground infrastructure. Current permitted development rights for electricity undertakers (Class B of Part 15 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015) include erection of plant and machinery up to 15 metres in height. This would allow the expansion of the OSEF into other areas within the DCO boundary with no further recourse to the local planning authorities. WLDC do not consider this to be appropriate in otherwise open land.

6. Requirements

6.1. The dDCO [APP-007] defines WLDC as a 'relevant planning authority' for the purpose of approving the following DCO 'Requirements':

i. Requirement 3 – phasing of the authorised development and date of final decommissioning);
ii. Requirement 4 – requirement for written approval
iii. Requirement 5 – detailed design approval
iv. Requirement 6 – community liaison group
v. Requirement 8 – landscape and ecology management plan
vi. Requirement 9 – biodiversity net gain
vii. Requirement 10 – fencing and other means of enclosure
viii. Requirement 13 – construction environmental management plan
ix. Requirement 14 – operational environmental management plan
x. Requirement 16 – operational noise
xi. Requirement 17 – skills, supply chain and employment
xii. Requirement 20 – decommissioning and restoration
xiii. Requirement 21 – ground conditions

6.2. The 'Requirements' that are not specified for approval by WLDC are (to be approved by Lincolnshire County Council and Nottinghamshire County Council:

i. Requirement 7 – battery safety management plan
ii. Requirement 11 – surface water drainage
iii. Requirement 12 – archaeology

iv. Requirement 15 – construction traffic management plan
v. Requirement 18 – public rights of way management plan
vi. Requirement 19 – soil management plan

6.3. WLDC agrees with the above responsibilities for the approval of DCO 'Requirements', however the Council would additionally wish to be consulted on the following as matters that have impacts on the communities of West Lindsey:

i. Requirement 7 – battery safety management plan
ii. Requirement 15 – construction traffic management plan.

6.4. Requirement 20 of the dDCO [APP-007] currently lacks a mechanism to require decommissioning if the project ceases to generate energy prior. Given that, in this scenario, the harms would remain without the benefits of the project we request a mechanism is added to ensure decommissioning will occur, should generation cease prior to 60 years following final commissioning. We would draw the Examining Authority's attention to the DCO Requirement numbered 64 in Part 2 of Schedule 1 (page 64) of the Oaklands Farm Solar Park Order 2025 which was made by the Secretary of State on 19th June 2025. In particular sub paragraph (4) of the DCO Requirement which states:

(4) The undertaker must provide notice to the local planning authority once any part of the authorised development stops generating electricity for more than 6 months. If, by expiry of the period of 12 continuous months beginning with the date of the notice, and unless otherwise agreed in writing by the undertaker and the relevant local planning authority, that part of the authorised development does not re-generate electricity, then within 3 months the undertaker must submit to the local planning authority for that part (or both local planning authorities where that part falls within the administrative areas of both South Derbyshire District Council and Derbyshire County Council) for approval a decommissioning environmental management plan and a decommissioning traffic management plan for that part.

6.5. WLDC consider that a similar DCO Requirement would be appropriate for the One Earth Solar Farm.

6.6. WLDC also notes that, under sub paragraph (3) of Requirement 20, the OESF dDCO [APP-007] that the applicant commits to submitting a decommissioning environmental management plan to the local planning authority "no later than ten weeks prior to the intended date of decommissioning". However, 10 weeks is the determination period set out in article 45 the local planning authorities to determine applications for discharge of DCO Requirements. Notwithstanding WLDC's comments in the next section on article 45, WLDC considers submitting the application to discharge the requirement for a decommissioning environmental management plan just 10 weeks before start of decommissioning is not appropriate, particularly as the DCO does not require any pre-application consultation and article 45 is drafted such that an application is deemed to have been approved after the expiry of the appropriate time period.

6.7. WLDC would suggest that submission three months before decommissioning is due to start would give an appropriate period for any issues arising to be raised and considered, and the application determined in advance of decommissioning commencing.

Schedule 15 - Article 45: Procedure for discharge of requirements

6.8. WLDC is in the position of potentially being responsible for the approval of DCO requirements relating to five solar NSIP projects, which all may feasibly be seeking such approvals on similar timescales.

6.9. The likely volume, technical complexity and requirement to consult external bodies will place considerable time pressures on WLDC to assess important details that will affect the communities and environment of the district for over half a century.

6.10. This matter was considered by the Secretary of State previously in the Cottam decision in which he stated (paragraph 4.110):

"The Secretary of State has carefully considered the suggested discharge periods and concluded that a compromise of 13 weeks would be most appropriate ***to account for the number of applications coming forward in Lincolnshire****, whilst seeking to avoid delays to the progress of the Proposed Development."*

Furthermore, to the recognition that there will be multiple solar NSIP developments submitting requirement discharges within a similar time period to the same authorities, the OESF project adds the additional complexity of taking place across multiple district and county authorities, where it would be in all parties' interests to allow the authorities to collaborate. To that end, it is considered that more time is required, and 13 weeks should be considered as a minimum.

6.11. In light of these pressures, and with reference to action point 4 on the Actions arising from the ISH1 held on the 9 July 2025, WLDC wishes to see the following amendments to Schedule 15 of the dDCO [APP-007]:

- That WLDC must give notice to the undertaker (applicant) if its decision on the application within a period of **13 weeks** beginning with the later of-

  a) The day immediately following that on which the application is received by the authority;

  b) The day immediately following that on which further information has been supplied by the undertaker under paragraph 3 (of Schedule 15); or

  c) Such longer period that is agreed in writing by the undertaker and the relevant planning authority

6.12. The increase in this time period from 10 to 13 weeks is considered proportionate to enable WLDC to carry-out its duties in the public interest.

7. Planning balance

7.1. The application falls to be determined in accordance with section 104 of the PA2008.

7.2. WLDC raises significant objections to the project; key issues being the cumulative impact on the landscape and visual amenity and construction impacts, and the impact of the project in solus on landscape character and visual effects.

7.3. WLDC recognises that the Scheme would help meet a national need for additional electricity generating capacity, and this accords with the UK's energy policy to decarbonise electricity generation and deliver security of supply.

7.4. The cumulative circumstances of this proposal being determined alongside three other NSIP solar projects results in unprecedented cumulative impacts in construction, operation and decommissioning.

7.5. WLDC concludes that that proposal fails to accord with the relevant NPSs, the NPPF, the adopted Local Plan and adopted Neighbourhood Plans with regard to its cumulative impacts and the impact on landscape character and visual effects/amenity.

7.6. WLDC consequently objects to the OESF project and invites the SoS to refuse development consent.

Positive impacts

- EN-1 delivery of low carbon electricity generation (in solus) (operation)
- Aligns with strategic policy (in solus) (operation)
- Mitigation delivered through the LEMP (in solus) (construction and operation)
- Carbon benefits over the lifespan (in solus) (operation)
- Additional permissive rights of way (in solus) (operation)

Negative impacts

- Landscape and visual – impacts on landscape character (cumulative and in solus) (construction and operation)
- Sequential effects through the landscape (cumulative) (construction and operation)
- Design up against field boundaries (in solus) (operation)
- Visible and conspicuous BESS/SS – including from the prominent PROW in area (in solus) (construction and operation)
- Hydrology (development in Flood Zone 3) (in solus) (construction and operation)
- Loss of BMV land (in solus) (construction and operation)
- Strategic construction traffic (cumulative and in solus) (construction)
- Access points – numbers (in solus) (construction)
- Tourism (cumulative and in solus) (construction)

- Impacts of construction cumulatively with other projects with a lack of co-ordination during construction (cumulative) (construction)
- Scope of ‘maintenance’ powers enabling significant replacement / re-powering and waste/recycling (cumulative and in solus) (operation)

Neutral impacts

- Biodiversity (cumulative and in solus) (construction and operation)
- Glint and glare (cumulative and in solus) (construction and operation)
- Buried heritage (cumulative and in solus) (construction and operation)
- Air quality (cumulative and in solus) (construction and operation)
- Noise and vibration (cumulative and in solus) (construction and operation)

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West Lindsey District Council
Guildhall, Marshall's Yard
Gainsborough
Lincolnshire, DN21 2NA