

By Email to:

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Date: 29 July 2025

Dear Sir/Madam

Planning Act 2008 – Section 89 and The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 8 and 9, 10, and 17

Application by One Earth for an Order Granting Development Consent for the One Earth Solar Farm Project

Following the Planning Inspectorates Rule 8 letter dated 17 July 2025 the County Council submits its written representation in respect of this application. The Council provided initial comments in relation to this application in its Relevant Representation response earlier this year and full details on the impacts of the development in our Local Impact Report (LIR) submitted 29 July 2025 at deadline 1.

This written representation provides the Council's updated position following consideration of the application by the Council's Planning and Regulation Committee on 14 July 2025.

This written representation has been prepared in accordance with PINS advice note 8.4 and should be read in conjunction with the Council's LIR submitted by the Council at deadline 1. The LIR was brought to the Council's July 2025 Planning Committee when it was resolved to approve the Impact Report for submission. Based on the findings of this impact report the Council resolved to submit a **formal objection** to the application on the following grounds:

The project would produce 740MW of clean renewable energy that would support the nation's transition to a low carbon future and deliver biodiversity net gain benefits through the creation of mitigation and enhancements as well as other more limited positive impacts (as identified within our Local Impact Report). These positive impacts however are not outweighed by the negative, and significant impacts that arise given the overall size and scale of the development both on its own and in combination with the other large scale energy development and NSIP scale solar projects proposed in this geographical area as follows:

A significant negative impact upon the landscape character and visually both individually and cumulatively with other projects which results in the conclusion that the scheme would be contrary to Central Lincolnshire Local Plan policies S5 (Development in the Countryside), S14 (Renewable

Energy) and S53 (Design and Amenity). By reason of its mass and scale, the development would lead to significant adverse effects on landscape character and visual amenity at all main phases of the scheme. The development has the potential to transform the local landscape by altering its character on a large scale which has the potential to affect a wider landscape character, at a regional scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness, tranquillity and agricultural character that are identified as defining characteristics of the area. The alteration of views within an agricultural or rural landscape to that of a landscape with large scale solar development would also result in significant adverse effects on views from receptors.

A significant permanent and negative impact as a consequence of the loss of 170.81ha BMV agricultural land across the whole scheme. The proposal also involves the temporary loss of 137.6ha of BMV land in Lincolnshire (660.9ha across the whole scheme) for 60 years, which is a substantial period. This loss is not only at a local level but significant when considered in-combination with the loss of land from other NSIP scale solar developments which are also being promoted and considered across Lincolnshire, contrary to Central Lincolnshire Local Plan policy S67 (Best and Most versatile Agricultural Land). Furthermore, the whole area is currently productive arable farmland, which would be lost for over 60 years. It may be replaced by a lower-intensity grass-based system, resulting in a locally significant loss of arable output, with potential cumulative impacts across the District and County. According to DEFRA figures, the cumulative loss of crop output could reach approximately £50 million, representing a substantial economic impact on agricultural land productivity.

The level of archaeological investigations conducted so far is considered to be inadequate to assess the potential impact on buried heritage assets. There is a real risk of encountering significant, previously unknown remains. It is concluded that the proposed development would likely have a negative construction impact on heritage assets unless further evaluation and mitigation measures are implemented and at this stage is therefore considered to be contrary to CLLP policy S57 (The Historic Environment).

Additional information is needed to demonstrate how waste arising from solar infrastructure would be sustainably managed. Currently there are no facilities to process and recycle solar panels and associated equipment. When combined with the other solar projects in the County that have either had DCOs granted or that may be granted in the near future, would present a significant issue as additional facilities would be required to ensure these products are sustainably disposed. As such it is considered to be contrary to LMWLP policy W1 (Future Requirements for New Waste Facilities).

A Minerals Safeguarding Assessment has been submitted providing an assessment of the proposed development against the Lincolnshire Minerals and Waste Local Plan (LMWLP) Policies M11 and M12. However contrary to Policy M11 no detailed assessment of the sand and gravel mineral resource however has been provided therefore it has to be assumed that there are viable mineral resources in the underlying land. The potential for mineral sterilisation is therefore significant, albeit temporary in nature. Further sand and gravel resources are likely to be required in Lincolnshire during the life of the OESF. The safeguarded Newton on Trent Oil site and 250m buffer zone is also surrounded by the OESF order limits boundary. Whilst the site is currently inactive, it has an extant planning permission. The Council considers that insufficient information has been provided in the assessment to demonstrate that the proposed OESF would not prejudice or detrimentally impact upon the operation of the safeguarded site in line with Policy M12. Minerals are a finite resource, even though the MSA extends beyond the order limits does not preclude the need to meaningfully assess the impact of the proposals on potential sterilisation of resources. In the development of OESF, minerals safeguarding does not appear to have been given any consideration as part of the site selection process.

There are concerns about the certainty of Grid Connection which is a crucial aspect of this proposal and the potential risk for negative environmental impacts to occur from the OESF development commencing without the benefits of generation which would be relied upon for the grant of any consent being secured. In the event the Secretary of State be minded to grant consent for the development it is recommended that the DCO should restrict the commencement of the development, through a requirement, until such time that the High Marnham substation has been granted consent and a material start has been made on the development.

There are currently 5 granted DCOs for solar farms and 8 solar farm proposals at various stages of the DCO application process in Lincolnshire. The cumulative impacts of the OESF, combined with the other developments identified could be significant and include landscape and visual effects, landscape character, construction-related traffic and transport movements, the long-term loss of BMV agricultural land and waste. The short list of inter-project cumulative impacts does not include any solar NSIP/DCO schemes in Lincolnshire, especially given the proximity of the solar developments around Gainsborough which includes Tillbridge, Cottam, Gate Burton and West Burton, and Steeple Renewables in Nottinghamshire as their impact was scoped out at an earlier stage. The Council is of the view that as a minimum the above DCO/NSIPs should be included on the list as the in combination landscape and visual effects of the OESF alongside other solar developments around Gainsborough and in Nottinghamshire could significantly impact the landscape character at national, county, and regional levels.

In conclusion, whilst the Council currently objects to the proposed development on a number of grounds, the Council will continue to engage with the applicant and Examining Authority throughout the examination period in an attempt to resolve as many of these concerns as possible by the close of the examination.

Yours faithfully,

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On Behalf of

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Head of Planning