



Nationally Significant Infrastructure Project: EN010159 – One Earth Solar Farm

**Response to The Examining Authority's written questions and requests for information
(ExQ1) issued on 7 August 2025**

Prepared by Lincolnshire County Council (LCC)

Interested Party Number: F26484797

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The following table sets out the Council's response to the Examining Authority's (ExA's) written questions and requests for information (ExQ1) where a response from the County Council was sought.

ExQ1	Question	LCC Response
General and cross-topic questions		
Q1.0.16	<p>Mitigation The outline Operational Environmental Management Plan (oOEMP) Revision 2 (submitted at D1) indicates at paragraph 2.6.2 that "In the event of large-scale replacements of components being required, it is anticipated that the procedure will be done gradually over a period of time to minimise the number of HGVs movements to the site."</p> <p>(3) Can the Councils confirm whether the management of operational traffic as currently proposed is consider suitable?</p>	LCC considers that the management of operational traffic as currently proposed is suitable. It is likely that the traffic associated with any replacement components will be less than the initial construction traffic, and necessary permanent mitigation (eg passing places) would be in place. Temporary traffic management can be arranged, depending on scale of replacement components required.
Q1.0.19	<p>Fire Safety Can the EA, the Councils Environmental Health Teams, Nottinghamshire and Lincolnshire Fire and Rescue Services, and UK Health Security Agency advise from your different areas of responsibility whether you are satisfied with the proposed approach to fire safety?</p>	<p>LFR have been engaged throughout the initial design phase of the development. Information and details have been provided, although LFR recognise at this stage, plans are indicative and further details will be required to offer final comments. The latest national guidance is being used to outline safety requirements, with the developer open to dialogue in relation to layout of the site, access and egress etc. Details below are comments specifically in relation to the current OBSMP:</p> <ul style="list-style-type: none"> - LFR note that the proposed distance between BESS containers will be reduced with supporting rationale – LFR will require further evidence of test data to be able to comment on suitability of the spacing – The Plan links to national standards and requirements

		<ul style="list-style-type: none"> - OBSMP States – <i>“BESS will be separated from the site boundaries by a minimum of 25m prior to any mitigations”</i> – No further details are provided and as such site plans will need to be confirmed - OBSMP Requirement – <i>“Emergency Plans including Risk Management and Emergency Response Plans (ERP) shared with the FRS”</i> – Document states – <i>“An ERP shall be developed in consultation with the local FRSs and include information to assist operators and firefighters in an effective fire response. These shall be reviewed and updated regularly. A risk management plan shall be developed, see Section 4.7 for details”</i> All relevant topics are outlined, but LFR reserve the right to comment and ensure plans are suitable and sufficient. - Section 4 General – Acknowledges that the developer will need to continue to engage with LFR as the development progresses and further information is made available – LFR retain the right to object as further specific details are submitted <p>LFR will require further details on battery technology as plans develop to support on-going engagement and development of emergency plans and procedures.</p> <p>All remaining areas appear compliant at this stage of the development, but again recognise site plans are indicative, with further details required for LFR to acknowledge compliance.</p>
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Q1.0.21	<p>Consultation on National Policy Statements</p> <p>The Government published on 24 April further consultation on each of the National Policy Statements, NPS – EN1, EN-3 and EN-5. The consultation period closed on 29 May 2025. Please advise if there are any areas of these documents that you consider the ExA should regard as important or relevant to the consideration of the Proposed Development.</p>	<p>Consultation on revisions to NPS EN-1, EN-3 and EN-5 closed as stated by the ExA on 29 May 2025. Whilst the review is undertaken, the current suite of energy NPS's remain relevant and have effect for the purposes of the Planning Act 2008.</p> <p>LCC considers the NPS EN-1, EN-3 and EN-5 draft consultation documents fundamentally remain same in regard to the significant issues raised by LCC.</p>
Q1.0.24	<p>Waste</p> <p>Can each party provide commentary on their views in respect to compliance with the Regulations: Waste Electrical and Electronic Equipment (WEEE) 2013</p>	<p>The primary aim of the Waste Electric and Electronic Equipment (WEEE) Regulations 2013 is to reduce the environmental impact of electrical and electronic equipment (EEE) at the end of its life by minimizing the amount of WEEE going to landfills and encouraging the re-use, recovery, and recycling of electrical and electronic products and their components. The regulations place the responsibility on producers for the collection, treatment, and environmentally sound disposal of electronic waste. Schedule 2 of the WEEE Regulations identify that solar panels are considered as EEE and therefore should be handled in accordance with the Regulations.</p> <p>It is noted in the Outline Operational Environment Management Plan (oOEMP) ([APP-178] paragraph 2.9.2) the Applicant commits to 100% reuse and recycling of solar panels during operation. Paragraph 2.9.5 also commits the Applicant to working with Waste Planning Authorities to ensure the cumulative generation of waste is managed appropriately. The County Council however would question how this would be tracked given that in paragraph 2.9.4 references that <i>'All waste to be removed from the Order Limits will be undertaken by fully licensed waste carriers and taken to suitably licensed waste management facilities and managed in line with the requirements of the Waste (England and Wales) Regulations (2011) and the Hazardous Waste (England and Wales) Regulations (2005) (as amended).'</i></p>

		<p>The applicant is relying on the development of suitable facilities to address the waste arising from decommissioning in 60 years' time. These facilities currently do not exist at the scale required. No information is provided on the operational phase annual failure rates. Lincolnshire is currently home to 5 approved DCO applications, with a further 8 in various stages of the process. The potential annual failure rates of solar panels and how the recovery, re-use and recycling of these panels both alone and in combination with other solar farms (both DCO and TCPA) needs to be addressed. It is suggested that the applicant works with other solar developers to ensure that these facilities are available both in the short and long term to ensure that the both the Regulations and the statement in the oOEMP of 100% reuse and recycling of solar panels during operation, are fully adhered to.</p>
Q1.0.25	<p>Waste Planning</p> <p>In light of the number of solar schemes already approved, and the number in the pipeline, what plans are being prepared as waste authorities to manage this over the coming years?</p>	<p>The current adopted Lincolnshire Minerals and Waste Local Plan makes provision for additional waste management capacity through a combination of criteria-based policies and allocations. The Core Strategy and Development Management Policies, adopted in June 2016, includes amongst others, Policies W3 and W4 that set out the spatial strategy and locational criteria for new waste facilities. The Site Locations document, adopted in December 2017, also includes Policy SL3 which allocates 1 site and 16 preferred areas for waste management facilities to make sufficient provision for the waste management needs that were identified at the time the plan was adopted.</p> <p>Lincolnshire County Council is currently in the process of updating the Minerals and Waste Local Plan having undertaken a Regulation 18 consultation in 2024 on its 'Preferred Approach' for updating the plan. The Preferred Approach consultation document was informed by a Waste Needs Assessment published in June 2021 which demonstrated</p>

		<p>that there were no predicted waste management capacity gaps up to 2045. The preferred approach does not therefore propose to make specific allocations for waste management facilities, however when considering the ongoing evolution of waste management technologies, cross boundary movements, and the fact that waste needs may change over time, it considered that it is still necessary for the plan to provide a suitable criteria based policy framework to guide and assess any future waste management proposals that may come forward during the plan period.</p> <p>The council is now in the process of commissioning an updated Waste Needs Assessment to inform the next (Regulation 19) stage of the emerging Minerals and Waste Local Plan. As part of this process, consideration will be given to potential waste arisings from solar farms and whether the Plan will need to make any specific provisions to meet identified needs.</p> <p>Whilst the policy framework is yet to be finalised, the emerging Lincolnshire Minerals and Waste Local Plan will nevertheless seek to continue to provide a positive policy framework to guide and assess any future waste management proposals that may come forward during the plan period. This would therefore include any new dedicated development for potentially recycling or reusing the waste from solar farm developments.</p> <p>Once adopted the Plan will be monitored annually with consideration given to the effectiveness of the policies. This will aid the consideration of whether an early review of the plan is required.</p> <p>Having said that, although the Council's MWLP sets out to enable sufficient waste management capacity, the actual development of it will depend on a developer bringing forwards and proceeding with a suitable proposal. In terms of waste from solar farms, both the</p>
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		planning for and delivery of suitable capacity is hampered by the short-term need for large-scale capacity when multiple NSIP-scale solar farms decommission at around the same time.
Design, parameters and other details of the proposed development		
Q2.0.4	<p>Design Principles</p> <p>Do the Councils agree that sufficient information has been provided in respect of design matters to meet the tests set out in NPS EN-1 para 5.10.29 and this is suitably secured to ensure that future consenting would meet landscape, visual and good design objectives?</p>	<p>We recognise the requirements of NPS EN-1 paragraph 5.10.29 in respect of securing good design and ensuring that landscape and visual considerations are fully addressed. A suite of documents has been provided by the applicant setting out the design intent and explaining the design process that has been undertaken.</p> <p>The ES presents an assessment of a 'worst case' scenario of the Development, based on design parameters presented in ES <i>Chapter 5: Description of the Proposed Development, Document 5.9 Outline Design Parameters Document</i> and Works Plan areas shown on <i>Figure 2.3: Works Plan</i>.</p> <p>Section 5.2 of Chapter 5 describes the project parameters that the LVIA have assessed, and clarifies in para. 5.2.1 that to "<i>accommodate flexibility, a 'Rochdale Envelope' approach is used</i>" that "<i>involves the technical assessments being undertaken and based on a defined 'envelope' within which the project will be delivered, featuring maximum and minimum parameters, so that an assessment of the reasonable worst case scenario can be undertaken</i>".</p> <p>However, in landscape and visual terms, the LVIA is not explicit in this regard, and while chapters 11.3.38 to 11.3.40 provide some information on assumptions that have been used at each phase of the scheme, in no location states or clarifies that the LVIA has been undertaken on a worst-case scenario regards to assessing the maximum parameters laid out in <i>Chapter 5, Document 5.9</i> and areas shown on <i>Figure 2.3: Works Plan</i>.</p>

		<p>It has been assumed that the maximum parameters have been used within the LVIA chapter, however it should be clarified by the applicant.</p> <p>The scheme has been presented as evolving through an iterative process, with the landscape and visual findings feeding back into the design. Paragraphs 11.5.9 and 11.5.10 of the ES describe how the scheme has responded to landscape and visual matters. The design appears to have a clear evolution through different stages of the masterplan. The mitigation has responded to the recommendations of the local landscape character area reports and feedback from community events and statutory consultees where possible.</p> <p>Paragraphs 11.5.9 and 11.5.10 6 of the LVIA describes the embedded mitigation measures of the scheme which avoid, where practicable, adverse effects on the landscape and views. This process is described in more detail within ES Chapter 5. These mitigation proposals reference a series of documents within the DCO package, in particular the Design Approach document which lays out how landscape and visual matters have been addressed within the design.</p> <p>While the submission includes landscape proposals, these are indicative and are presented at a high level (i.e. not detailed), therefore it is expected that detailed landscape plans would to be submitted and subsequently agreed with the appropriate consultee/authority prior to the commencement of any works, which would be secured by Requirement 8 of the DCO. This would include clear detail of the areas of landscape mitigation, location and types of planting (species), as well as number, density and specification. The mitigation illustrated on <i>Figure 2.7: Illustrative Masterplan</i> and the <i>Mitigation Plan</i> within Appendix A of the OLEMP, secured via Work Order 8 on the Works Plans and DCO, has been utilised to assess the</p>
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		<p>landscape and visual effects of the scheme, therefore we would expect any detailed landscape proposals to consist of the area and extent shown on these plans as a minimum.</p> <p>We emphasise the importance of the Design Principles remaining enforceable and not being diluted during later, detailed iterations and seek continued involvement at the discharge of Requirements to ensure detailed design matters contribute positively to the landscape character and visual amenity of the area.</p> <p>Therefore, while design matters have been addressed, we do stress that effective delivery at detailed design stage is critical to ensuring that the scheme ultimately meets landscape, visual and good design objectives.</p>
The Environmental Statement (general)		
Q3.0.2	<p>Environmental Statement</p> <p>(1) With a 60 year lifespan please explain the frequency with which you would expect to have to replace components, for example BESS, Inverters, Panels.</p> <p>(2) It would appear that there is no specific assessment of replacements as it has been assumed it would be no worse than the initial construction period, is this a correct interpretation?</p> <p>(3) Assuming this is correct, the controls in place during construction to mitigate any consequential effects, would appear to need to be in place during operation, unless there is a control mechanism in place that would prevent a large-scale replacement of components. What would be a reasonable</p>	<p>(1) LCC are unable to comment as this is best addressed to the applicant.</p> <p>(2) LCC are unable to answer the question but would agree that the applicant needs to provide forecasts for the quantity of waste (e.g. failed PV panels) arising during the operational phase. This must include both unexpected failures and wider replacement at end of life as it is highly unlikely any of the components would last the full 60 years.</p> <p>(3) LCC are unable to give a specific threshold for the quantity of waste which is acceptable, particularly in light of the cumulative waste arisings from other solar NSIPs in our area. However, we agree that the applicant needs not only to forecast their waste arisings for each year during the various phases of the project (construction, operation and decommissioning) but also to:</p>

	threshold that would ensure adverse environmental effects do not occur?	<ul style="list-style-type: none"> • Seek to minimise those arisings and otherwise to follow the waste hierarchy in choosing their fate, and • Phase works (e.g. routine replacement of PV panels) to spread the waste arisings and thus limit the impact on waste processing capacity.
Biodiversity, ecology and natural environment (including Habitats Regulations Assessment (HRA))		
Q7.0.2	<p>Bat Research</p> <p>It is the ExA's understanding that there is the intention to monitor bat activity in advance and then post construction to assist in developing an understanding of the effect on bats from solar array sites? (C33 in commitments register)</p> <p>(1) How is this information to be collated and shared and over what time frame is this intended to take place?</p> <p>(2) Do NE agree that this would give robust data which would assist in developing understanding?</p> <p>(3) Do NE or the Councils regard this as a benefit that could weigh in favour of the scheme?</p>	<p>(3) LCC is of the opinion that whilst the proposed scheme of monitoring is intended to assist in furthering the wider understanding of the effects of solar developments on local bat populations, it is also an important element of the overall mitigation scheme which will be able to inform adaptive management proposals during the lifetime of the proposed development. LCC is of the opinion that this should not be afforded any significant positive weight in the planning balance.</p>
The draft Development Consent Order (DCO)		
Schedule 1 – Authorised development		
Q10.1.1	<p>Work No.4</p> <p>By including (b) 'the laying down of construction areas' this would appear to allow the whole of the area defined for Work No.4 on the Work Plans to be used as construction areas?</p> <p>(1) If the ExA's understanding is correct that the construction areas can be over a</p>	<p>LCC notes that work no.4 relating to the cable route corridor covers a large swathe of the Order Limits. LCC reads work no.4 as the ExA have laid out within their question. However, construction activities would be controlled within the CEMP, discharged under requirement 13 of the DCO, should the DCO be granted. Requirement 13 would be discharged by the relevant planning authority for that part, in consultation with the appropriate county authority. The CEMP must be substantially in accordance with the oCEMP. LCC considers the</p>

	significant proportion of the site, are the Councils content that the construction activities would be controlled to an acceptable degree by the proposed mitigation and management plans?	latest iteration of the oCEMP updated at deadline 1 proposes appropriate management measures during construction which would be secured via requirement 13.
Schedule 2 - Requirements		
Q10.2.1	<p>Requirements</p> <p>Noting the Applicant response to ISH1 (page 16 of post ISH1 written submission) and the current explanation given by the Applicant that it is not only preferable to retain the phrase ‘substantially in accordance with’ but this allows for the management plans to be evolved as more detail comes forward.</p> <p>(1) Do the Councils have any concerns with the retention of this phrase in each of the Requirements.</p> <p>(2) Do the Councils agree that the Management Plans as drafted give the certainty and clarity required at this stage of the process, noting that they have been revised at D1.</p>	<p>LCC has sought legal advice as to the use of the phrase “substantially in accordance with” as part of DCO requirements where reference is sought to be made to an outline scheme submitted with the DCO and there is a requirement for a final version of a particular scheme to be submitted to the relevant planning authority for approval. LCC is satisfied that this wording does not result in undue flexibility to the applicant. LCC consider that requiring strict adherence to the outline scheme reduces flexibility for the final scheme to respond positively to issues arising during the detailed design phase.</p> <p>Further, requiring a final scheme to be “substantially in accordance with” the outline scheme does not mean that the authority is bound to approve any scheme that is substantially in accordance with the outline version. Instead, the authority would retain an ability to refuse any scheme that was insufficient, regardless of whether it was in accordance with or substantially in accordance with the submitted outline scheme. Overall, LCC considers it preferable to require final schemes to be “substantially in accordance with” rather than “strictly in accordance with” to allow for flexibility at detailed design stage.</p>
Q10.2.3	<p>Requirement 8</p> <p>(1) Noting the Applicant response to ISH1 (page 16 of post ISH1 written submission) Do the Councils have any concerns in respect of the wording of the Requirement, or that the certainty for maintenance would be delivered through the LEMP?</p>	<p>The wording in the DCO Requirement 8 is very much focussed on written management and does not include for a detailed planting scheme. Subject to gaining approval for the scheme, we would expect at the detailed design stage the applicant is required to develop detailed planting plans clearly showing the location and types of planting (species), as well as number, density and specification, along with planting details and specifications. This provision of detailed</p>

		<p>planting, and subsequent agreement with relevant authority must be explicit in the OLEMP.</p> <p>Paragraph 1.2.5 of the OLEMP clarifies that “<i>vegetation that is likely to be planted as part of the Proposed Development as part of the wider mitigation and enhancement strategy</i>” is shown on the Landscape Mitigation Plan with Appendix A.</p> <p>Paragraph 4.1.2 of the OLEMP also References the Landscape Mitigation Plan contained with Appendix A, clarifying it only provides indicative locations. This is understood; however, a clear statement in OLEMP is required stating clearly that this mitigation plan will subsequently be developed in more detail for approval by the authority. We would expect as a minimum a detailed planting scheme that would show location and types of planting, along with species, number and specification as well as planting details and notes.</p>
Historic environment		
Q11.0.1	<p>Extent of investigation</p> <p>NPS EN-3 at paragraph 2.10.113 states “the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out using expertise where necessary and in consultation with the local planning authority, and should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets.”</p> <p>(1) Can each party provide evidence to support their position in respect of the suitability of the investigations that have been</p>	<p>Baseline evidence from trial trenching results are required to inform a reasonable and appropriate agreed mitigation strategy which can adequately deal with the developmental impact of this scheme upon the currently surviving significant archaeology.</p> <p>Standard archaeological mitigation includes preservation in situ (where an area of archaeological sensitivity is located and its extent is determined by evaluation then mitigation measures are taken to ensure there are no detrimental impacts for the duration of the scheme) or preservation by record (where an archaeological area is archaeologically investigated by for example Strip, Map and Record (SMR) or Excavation then the site is released for use by the Developer).</p> <p>Additional mitigation measures requiring flexibility such as micrositeing</p>

	<p>undertaken, and why either further trial trenching or other form of investigation should or should not be carried out.</p>	<p>require enough baseline evidence to know the extent of an archaeological area to move out of and also blank areas to know where it's safe to move into.</p> <p>Mitigation measures which propose preservation in situ while using archaeological areas for the development, such as concrete shoes, require enough baseline evidence for an understanding of the nature, depth, significance and extent of the archaeology so that the mitigation area can be determined. There must also be demonstrable adequate proof that the proposed mitigation measures would not detrimentally impact the surviving archaeology in any way throughout the lifetime of the scheme. It is not only groundworks and compaction but also for example changes to the hydrology or soil chemistry which can damage and destroy surviving archaeology without allowing for their preservation by record.</p> <p>For this scheme, 29 sites of archaeological interest have so far been identified and further trenching evaluation has yet to be undertaken allowing for further sites to be identified across the Order Limits. The archaeological sites themselves will need to be sufficiently investigated to be understood enough to deal with the developmental impacts on these sites, and each site will need sufficient baseline evidence of its nature, significance, depth and extent to inform the fit for purpose mitigation measures necessary to protect and/or investigate these currently surviving areas of archaeology.</p>
Q11.0.2	<p>Design Proposals/ Alternative Foundation Designs</p> <p>(1) The application appears to indicate that piles will be used for the foundations for the supporting frames for the solar panels. Have alternative solutions been explored such as shoes as referenced in paragraph 2.10.110 of NPS EN-3 and Historic England 2021</p>	<p>(3) Regarding concrete shoes, there must be sufficient evaluation to provide baseline evidence for any areas where concrete shoes are proposed. Some currently surviving archaeology may be to a sufficient depth and of a nature that would not be detrimentally impacted by concrete shoes, their placement, settlement across many decades or removal.</p> <p>In other cases the placement of concrete shoes would not mitigate</p>

	<p>Commercial renewable energy development and the historic environment. Historic England Advice Note 15. Swindon. Historic England.?</p> <p>(2) If the use of 'shoes' has not been investigated, please provide an explanation of their suitability or otherwise in the context of this proposal.</p> <p>(3) Can HE and the Councils advise whether the use of 'shoes' (if confirmed as an appropriate method of securing the panels) would overcome the concerns identified in respect of the extent of investigations?</p> <p>(4) Is there an agreed position on what is regarded as low level piling? And whether the 3m depth specified by the Applicant would be regarded as low level piling?</p>	<p>developmental impact, rather it would destroy surviving archaeology through compaction and any associated groundworks. On another solar NSIP in Lincolnshire when trenching commenced unexpected Saxon skeletons were found within 20cm of the ground surface. Concrete shoes, and indeed any plant tracking over this area would have resulted in their being crushed and unrecorded as a direct impact of the development works.</p> <p>Regarding the use of concrete shoes then, like any potential mitigation measure its use must first be informed by sufficient evaluation to understand the nature, depth, extent and significance of the surviving archaeology or it cannot be proved that the impact is not harmful.</p> <p>(4) Any type of piling will go deeper than the archaeological horizon. Surviving archaeological deposits are usually less than a metre from the ground surface and often significantly shallower particularly in agricultural land where topsoil has been reduced.</p> <p>As well as the piling itself there is the potential impact of the removal of the piles during decommissioning and potentially during repowering through the operational period of the scheme. As a detailed methodology has not yet been provided by the Applicant, the potential impacts are also not known.</p>
Q11.0.3	<p>Archaeology</p> <p>Paragraph 2.10.137 of NPS EN-1 states that the ability of the Applicant to microsite specific elements during the construction phase should be an important consideration by the SoS when assessing the risk of damage to archaeology.</p> <p>(1) Please could the Applicant provide its consideration of the potential for micrositeing, including the practical feasibility in relation to</p>	<p>(3) The usefulness of the ability to microsite is entirely informed by the results of sufficient archaeological evaluation: one has to know where the significant archaeology is, and is not, in order to microsite effectively. Like every other mitigation technique there needs to be site-specific understanding of where there are archaeological areas and a working understanding of their nature, significance, depth and extent in order to inform reasonable fit for purpose mitigation measures.</p> <p>Given that trenching results are the basis for mitigation solutions</p>

	<p>the foundations of the solar panels?</p> <p>(2) Please could the Applicant ensure that any microsinig mitigation is explicitly secured in the Outline CEMP?</p> <p>(3) Could the County Archaeologists comment please?</p>	<p>through the design process are proposed for this scheme we recommend that the evaluation work is undertaken earlier rather than later to build capacity and to manage archaeological risk: the earlier the evaluation fieldwork is undertaken the more flexibility there is and the work is informed by the baseline evidence of the trenching results. A trenching evaluation shortly before the commencement of the main construction work programme would leave little time or adaptability for design changes.</p>
Q11.0.4	<p>Non Designated Heritage Assets</p> <p>(1) Can the Councils confirm they are content all non-designated heritage assets have been properly identified and considered as part of the heritage assessment?.</p> <p>(2) The WR at D1 from The Station makes reference to North Clifton Station and the Station Masters House, indicating both properties form a group, the ES Chapter 10 in section 10.6 appears to only reference the Station, is further assessment required?.</p>	<p>(1) Within the defined 1 km study area, the Council is satisfied that all non-designated heritage assets within Lincolnshire have been appropriately identified by the applicant as part of the heritage assessment.</p> <p>(2) The former North Clifton Station and the associated Station Master's House are historically and functionally linked, forming a coherent group with shared architectural and historic value. While the Environmental Statement references the Station, it does not appear to fully address the group value or the contribution of the Station Master's House/associated assets. The proposed development may result in harm to the significance of this group through changes to their setting, particularly in views from the south and east, due to the introduction of solar arrays in adjacent grassland. LCC would recommend, further assessment work for these assets. Mitigation measures, such as targeted screening, should be explored to reduce potential harm. As these buildings lie outside Lincolnshire, the Council defers to the professional advice of Nottinghamshire County Council regarding their assessment and management.</p>
Hydrology and hydrogeology and the Water Environment		
Q12.0.4	<p>Ongoing Maintenance</p> <p>Are IPs satisfied that the details within the OEMP are satisfactory to ensure that the drainage infrastructure will be maintained to a suitable level for the duration of the Proposed</p>	<p>There are no details provided yet. The oOEMP [REP1-050] states on Page 26:</p> <p>"The detailed SuDS Maintenance Schedule will include a regular schedule for visual inspection and maintenance of the surface water</p>

	Development.	<p>drainage network.”</p> <p>When this is provided we can confirm if the details are satisfactory to ensure surface water drainage will be maintained acceptably.</p>
Q12.0.5	<p>Compliance with the Water Framework Directive</p> <p>A number of IPs [including RR-007, RR-095] have expressed concern of the potential adverse effect on soil health, the environment and drinking water.</p> <p>(1) Please advise if there are any concerns that arise from the proposed development in respect of any effects that may arise on drinking water, either during construction, operation or subsequent decommissioning. (2) Please advise on whether you consider the Water Framework Directive would be complied with, and if you are content that mitigation offered through the DCO would meet with any concerns identified</p>	<p>LCC does not have internal expertise relating to these matters, LCC would defer to WLDC and their Environmental Health Officer.</p>
Q12.0.6	<p>Water Framework Directive</p> <p>NPS EN-1 states at paragraph 5.16.14 “The Secretary of State should be satisfied that a proposal has regard to current River Basin Management Plans and meets the requirements of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (including regulation 19). The specific objectives for particular river basins are set out in River Basin Management Plans. The Secretary of State must refuse development consent where a project is likely to cause deterioration of a water body or its</p>	<p>LCC does not have internal expertise relating to these matters, LCC would defer to the Environment Agency.</p>

	<p>failure to achieve good status or good potential, unless the requirements set out in Regulation 19 are met. A project may be approved in the absence of a qualifying Overriding Public Interest test only if there is sufficient certainty that it will not cause deterioration or compromise the achievement of good status or good potential.” (our highlighting)</p> <p>(1) Can each party advise on its position in respect of the Proposed Development, it’s relationship to any relevant River Basin Management Plan and the requirements of the WFD.</p> <p>(2) Can each party confirm their position in respect of whether there is likely to be any deterioration of a water body, or that any water body would not achieve a ‘good status’ or ‘good potential’ as a consequence of the Proposed Development, and</p> <p>(3) The relevant position in respect of whether Regulation 19 is /would be met?</p> <p>(4) In light of the current position of the Stage 1 WFD screening assessment recently submitted to the EA, whether it is likely the outcome of the screening assessment will be known prior to the end of the examination.</p>	
Land use and soils		
Q13.0.2	<p>BMV</p> <p>NPS EN-1 at paragraph 5.11.34 states that “The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land</p>	<p>Planning Statement [APP-168] paragraph 11.1.5 to 11.1.7 references the NPS with regard to BMV agricultural land. National policy requires applicants to demonstrate that development of agricultural land is necessary and that impacts are minimised on BMV agricultural land. The applicant then goes on to identify Appendix 1 of APP-168 (site</p>

	<p>without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land.”</p> <p>(1) Please explain how the economic and other benefits of the BMV has been assessed. (2) Do the Councils agree that there is sufficient justification provided?</p>	<p>selection report) and ES chapter 4 Alternatives and design evolution as document that set out the justification and necessity to use agricultural land and that the use of BMV has been minimised with no permanent loss.</p> <p>The applicants site selection focused around three fundamental attributes, irradiance and topography, a connection to the National Grid, and available land. The applicant states within section 3, site selection assessment of the site selection report (appendix 1 of APP-168) that when determining the location of the proposed development it ‘would as far as possible be located outside of Best and Most Versatile (BMV) Agricultural Land based on the information known at the time taken from Provisional Agricultural Land Classification (ALC) (England) Map produced by Natural England, noting that this could not always be avoided depending on the overall land quality in the area’.</p> <p>Paragraph 3.2.20 identifies a 10km search area from the developments identified point of connection (PoC). LCC notes the applicant’s statement regarding the lack of consistency surrounding search area size relating to adopted solar NSIPs. However, the main driver for the initial search area appears to be the desire to be in close proximity to the PoC and suitable locations where landowners were agreeable in principle to leasing their land for the proposed development. Further justification could be provided as to why a wider area of search was not considered.</p> <p>Paragraphs 3.3.4 - 3.3.11 [APP-168] consider site selection with regard to agricultural land classification and land type. The applicant’s approach when considering site location has been to avoid the higher grade 2 land to the south of the development, focusing on the grade 3 and 4. LCC would however highlight that grade 3a is still classified as BMV agricultural land. It is unclear whether a wider area of search was</p>
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Commented [AR1]: Has the applicant demonstrated the economic argument? All examinations seem to focus on BMV and the direct and indirect jobs created by the solar farm. The Socio Economic chapter considers direct impact of the solar farm on agricultural employment, but not the indirect economic impacts, ie the removal of land from agriculture would also have an impact on the upstream inputs (supply of seed fertilisers, farm machinery etc) and downstream supply chains. This does not seem to have been addressed.

		<p>adopted, and if so, would there have been suitable land pockets with lower grade classification available for development which would have reduced the impact on BMV land.</p> <p>LCC notes Paragraph 3.3.8 [APP-168] , which states '<i>Consideration was given as to whether alternative land could be found with less impacts on agricultural land in proximity to the High Marnham Substation. However, from the published information and professional judgement of the technical soils specialists the same type of grading is found throughout much of Lincolnshire and Nottinghamshire and so sites further from the point of connection would be likely to have very similar soil characteristics.</i>'</p> <p>Further justification should be provided as to the area of search and clarification should be given in regard to paragraph 3.3.8, what was the area of search considered from High Marnham substation and what was the justification/reasoning for the distance applied?</p> <p>Neither the socio-economic chapter (chapter 17) nor the Land and Soils chapter (chapter 8) of the ES considers the direct impact of the proposed development on agricultural employment, but not the indirect economic impacts, ie the removal of land from agriculture would also have an impact on the upstream inputs (supply of seed fertilisers, farm machinery etc) and downstream supply chains. This does not seem to have been addressed within their assessment, LCC considers further assessment is needed in relation to this.</p>
Q13.0.4	<p>Soil Health</p> <p>The depth of cables was discussed during the Hearings of the week commencing 7 July 2025, and there appeared to be some disagreement as to what a suitable depth should be to ensure ploughing could take place post development in the event cables</p>	<p>Generally 'ploughing' would only be affected by cables shallower than 45cm depth. However, it is more likely to be subsoiling and mole-ploughing activities, both of which can operate at depths of 80+cm, that would be restricted by shallow depth cables.</p> <p>To be on the safe side, cables that are not to be removed should be buried at depths of 1metre-1.2metre depth to ensure no interference</p>

	<p>were left in situ.</p> <p>(1) Please provide evidence of the depth of ploughing that has occurred across the land within the Order Limits.</p> <p>(2) In order to ensure ploughing would be possible post development in the event cables were to remain – what would the minimum depth require to be to facilitate this, (Is there a recognised best standard or advice note for the soil type across the Order Limits?)</p> <p>(3) How is this secured?</p>	<p>in future agricultural practices.</p>
Human Health		
Q14.0.4	<p>Human Health</p> <p>In the RR [RR-077] reference is made to “the fields used for solar arrays are still close to North Carlton and still appear to encircle some small hamlets and individual properties”</p> <p>(1) Please clarify if this should be North Clifton?</p>	<p>LCC can clarify that, yes, this should be North Clifton.</p>
Landscape and visual		
Q15.0.2	<p>National Landscapes</p> <p>Do the Councils and NE agree there is no effect on the setting of national landscapes and that the duty under s245 of the Levelling Up and Regeneration Act 2023 (LURA) do not apply?</p>	<p>The nearest National Landscape to the scheme is the Lincolnshire Wolds, located over 30km to the east. Due to distance, we have not identified any landscape or visual effects upon the setting of the National Landscape.</p>
Q15.0.3	<p>Veteran Trees</p> <p>At ISH1 the Applicant indicated that there were no veteran trees within the Order Limits. This has now been confirmed not to be correct in the D1 submissions.</p> <p>(1) In light of the fact 13 veteran trees are present within the Order Limits, should the</p>	<p>The DCO and mitigation should include explicit protection for veteran trees. Any veteran trees should be fully surveyed and protected to BS 5837: Trees in relation to design, demolition and construction throughout the construction period. Detailed proposals should be designed so as to align with BS 5837 to ensure these trees are fully protected and proposals are located with an appropriate offset. We would also expect that any maintenance operations, or replacement</p>

	DCO and or supporting mitigation document be worded to afford additional protection for such trees, by way for example of requiring no construction activity within root protection zones and/or for consultation to be undertaken with the LPAs prior to undertaking any work when this might be deemed necessary.	<p>for the lifetime of the project respect and protect these trees in line with this, or subsequently updated guidance on protecting trees from construction activities. We would support full consultation to be undertaken with the LPAs prior to undertaking any work when this might be deemed necessary.</p> <p>Due to the proposed longevity of the scheme, it is possible for currently well-established trees within the order limits to reach veteran status by meeting specific criterion within the 60-year timeframe, protection measures should be in place for this eventuality secured within the LEMP.</p>
Socio-economic effects		
Q17.0.3	<p>Employment and Skills</p> <p>(1) Within their LIR, BDC refer to their expectations on employment during the construction and operation of the Proposed Development. Can the Applicant please provide a response to the issues raised, including whether the measures outlined by BDC should be incorporated into the application documentation.</p> <p>(2) Can the Councils please confirm whether they are satisfied with the measures proposed, or are there more requirements needed?</p>	<p>Ongoing engagement with host local authorities and local education and training providers and business sector groups is welcome, to promote recruitment (at least for the operational stage) and to establish programmes with young people etc.</p> <p>(2) Continued further engagement with LCC and WLDC in the development of a comprehensive Employment and Skills Plan is welcomed. LCC agrees with Bassetlaw's assertion in its LIR that, to maximise social and economic benefits, it is vital to establish clear commitments to local employment and training, particularly given the short construction phase and long operational life of the project.</p> <p>As drafted, the OSSCP broadly covers the measures that LCC would expect, however, as written there is very little firm commitment to undertake anything. Therefore, we would expect that there is a firm commitment to undertake specific measures listed in the draft. We support the response from BDC, there is a significant opportunity for the improvement in skill levels and employment opportunities within the affected area, which will be a direct benefit to residents especially as such skills are likely to be transferable.</p>

		<p>The use of social media in advertising jobs seems to be very limited in the applicant's thoughts. This could be a much more central element of promoting jobs locally, given the prominence of social media.</p> <p>We recommend that someone from our Employment & Skills team is included as a contact in the Primary Public Sector Partner category to ensure efficient use of the forums we host.</p> <p>Previous comments from the pre-examination stage included the following:-</p> <p>i) Accessibility of employment sites to rural communities: Consider the following: -</p> <ul style="list-style-type: none"> • Information and Collaboration; • Access to Construction Employment, Up-skilling and Re-skilling; • Opening up the Supply Chain. <p>For example: -</p> <ul style="list-style-type: none"> ▪ Funded travel to work schemes – LCC is able to help scope and identify suitable projects in the study area. ▪ Engagement and partnership with local transport providers ▪ Support for local people to access private transport at reduced cost, where the above solutions are not possible (last resort). ▪ Where possible, these transport schemes should encourage use of a low carbon vehicle and ensure there is provision for EV charging at the site to encourage use of EVs for the journey to work.
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