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Your Ref: EN010159

Interested Party Number: F26484797

Date: 21 August 2025

Dear Sir/Madam,

Application by One Earth Solar Farm Limited for an Order granting Development Consent for the One Earth Solar Farm.

Deadline 2 submissions from Lincolnshire County Council including responses to ExQ1 and comments on deadline 1 submissions.

LCC notes the significant number of updated documents submitted at deadline 1 alongside submissions from interested parties at deadline 1. These submissions encompass updates to chapters, figures and appendices of the Environmental Statement (ES), revised plans, updated management plans and a revised draft Development Consent Order (dDCO). LCC provides the following comments at this stage and will offer additional feedback as required within future written submissions and/or during examination hearings.

Ecology Comments

ES Chapter 6 Biodiversity

LCC notes the updates made to Chapter 6: Biodiversity (REP1-024) and welcomes the clarifications.

- Veteran trees: LCC notes that veteran trees have now been properly recorded in Chapter 6 in line with the Applicant's Arboricultural report.

- Great crested newts: LCC notes that additional eDNA surveys for great crested newts have been carried out in 2025 and that all results were negative. However, LCC notes that several ponds both within the DCO area and in the vicinity have not been surveyed due to access constraints. The results of the desk-based assessment suggest that there remains potential for undetected populations of great crested newts in the area. Table 6.6, C15 confirms that the Ecological Clerk of Works will be responsible for undertaking checks for protected species prior to vegetation clearance and that European Protected Species are found works will need to stop until a license is obtained from Natural England.
- Bats: LCC welcomes the commitment in [REDACTED] [REDACTED] soft felling of trees with potential [REDACTED]. The OCEMP and Commitments Register do not yet appear to have been updated to reflect this change.
- LCC welcomes the confirmation at Table 6.6, C23 that funding will be provided for 10 years to support mink control work in order to help restore water vole populations.
- Biodiversity Net Gain: LCC welcomes the commitment at Table 6.6, C35 to deliver at least 10% BNG. Given the scale and nature of the development LCC would expect that significantly more than 10% can be delivered in line with current predictions in the Applicant's BNG Assessment (REP1-040).
- LCC notes and welcomes the additions of C36 (further habitat surveys), C37 (veteran trees) and C38 (riparian mammal surveys) in Table 6.6. The Commitments Register and securing mechanism documents should be updated to reflect these additions.
- Skylark: LCC welcomes the clarification at 6.10.109 to 6.10.111 in relation to the likely impacts of the scheme on skylark and measures taken to ensure that the local skylark population is at least maintained.

LCC also notes the updates to various technical appendices relating to ecology and subject to the following comments, welcomes the clarification and additional information included in these.

ES Appendix 6.2 Ecology Desk study (REP1-030)

No comments.

ES Appendix 6.3 Extended Habitat Survey (REP1-032)

LCC notes that a precautionary approach to has been taken to the classification of ponds with all ponds being classified as priority habitat. LCC considers that this is acceptable.

LCC notes that waterways within the site are classified as ditches rather than rivers or streams due to the level of artificial management of water levels and agrees that this seems appropriate.

ES Appendix 6.5 Breeding Bird Baseline (REP1-034)

LCC welcomes the inclusion of data from surveys undertaken in 2025 to increase coverage for areas not previously surveyed. LCC considers that the data is now generally acceptable to base an assessment of the impacts of the scheme on breeding bird populations upon. However, LCC notes that the timing (morning) of breeding bird surveys does not specifically account for Schedule 1 species, such as barn owl and quail, whose breeding activity may not necessarily be encompassed within the scope of a standard breeding bird survey due to the timing of their breeding activity. Both barn owl and quail were detected in surveys in 2023 and this raises the possibility of the species' presence being underestimated. LCC recommends that additional specific surveys are undertaken prior to construction to ascertain the likely presence absence of species such as but not limited to barn owl and quail.

ES Appendix 6.6 Great Crest Newt Baseline (REP1-036)

As stated above LCC is of the opinion that there remains potential for great crested newts to be present due to lack of survey coverage of some ponds within and adjacent to the DCO area.

ES Appendix 6.8 Wintering Bird Baseline (REP1-038)

LCC has reviewed the updated report and considers that the survey methods used, and the survey effort deployed were appropriate.

ES Appendix 6.10 Biodiversity Net Gain Assessment (REP1-040)

LCC notes that veteran trees have now been added to the baseline assessment.

LCC has reviewed the updated assessment and statutory biodiversity metric and notes that that the proposed gains following the updated assessment are 112.88% habitat units, 92.64% hedgerow units and 57.75% watercourse units and that the metric trading rules are met. LCC encourages the Applicant to secure gains at these levels with a specific commitment in the DCO to ensure that they are given appropriate weight in the planning balance.

ES Appendix 6.11 Fish habitat Baseline (REP1-042)

LCC has reviewed the report and considers that the methods used in undertaking the assessment are appropriate.

ES Chapter 7.4 Outline Construction Environmental Management Plan (REP1-047)

LCC notes and welcomes the updates made to the Applicant's CEMP (REP1-047) in relation to ecology and biodiversity. LCC particularly welcomes the Applicant's commitment at 2.12 to working with other Projects.

ES Chapter 7.5 Outline Operational Environmental Management Plan (REP1-049)

LCC notes the updated Outline OOEMP (REP1-049) and has no further comments to make in relation to ecology and biodiversity at this stage.

ES Chapter 7.6 Outline Decommissioning Environmental Management Plan (REP1-051)

LCC notes the updates made to the Applicant's ODEMP (REP1-051) and has no further comments to make in relation to ecology and biodiversity at this stage.

ES Chapter 7.7 Outline Landscape Environmental Management Plan (REP1-053)

LCC notes the updates made to the Applicant's OLEMP (REP1-053) and has the following comments to make in relation to ecology and biodiversity:

LCC notes and welcomes the commitment at 4.2.6 to commencing the establishment of mitigation habitats where no construction works area at least 3 months ahead of construction. This will help to ensure new habitats can begin to establish and function as construction commences.

LCC welcomes the inclusion of SUDS within solar array areas and agrees that these are likely to provide biodiversity benefits. The Applicant will need to ensure that they are managed in order to retain both water management functions and biodiversity benefits.

LCC agrees with the stated approach at 5.2.2 in relation to undertaking further surveys and soil testing prior to commencement of construction in order to determine appropriate species mixes and any need for nutrient management by establishing sacrificial crops. The details provided in 5.4.49 – 5.4.55 in relation to the establishment and management of species grassland are appropriate and welcomed.

LCC welcomes the confirmation at 5.4.3 that existing and proposed habitats will be managed for the operational duration of the Proposed Development.

LCC considers that the details provided in Section 7 in relation to post-construction ecological monitoring are appropriate at this stage.

Shadow Habitats Regulation Assessment (REP1-019)

LCC notes the updates made in REP1-019 and has no further comments to make at this stage.

Draft Development Consent Order (REP-007)

LCC notes the update made in REP1-007 to Requirement 9 Biodiversity net gain. LCC welcomes the Applicant's commitment to delivering biodiversity net gain but disagrees with the use of maximum percentages to be delivered in this Requirement. This is not consistent with the drafting of other recent DCOs which refer to the delivery of minimum percentages of BNG. LCC is of the opinion that a Requirement to deliver minimum percentages in line with predictions in REP1-041 should be used.

LCC encourages the Applicant to secure gains at the levels predicted in (REP1-033) with a specific commitment in the DCO to ensure that they are given significant weight in the planning balance.

Human Health Comments

The August 2025 updates to the Environmental Statement (ES) for the One Earth Solar Farm have introduced several key revisions to strengthen environmental safeguards and address stakeholder feedback. The biodiversity chapter was expanded with new species surveys and a Biodiversity Net Gain assessment, detailing how the project will exceed the statutory 10%

BNG requirement. Transport and access updates reflect the revised construction traffic volumes, updated access routes and mitigation for sensitive receptors alongside the integration with local authority feedback on road safety. Revised management plans, such as the Construction Environmental Management Plan (CEMP), Soil Management Plan, and Decommissioning Plan, outlined clearer mitigation strategies and emergency protocols. These changes are suggested to improve ecological protection, reduce construction impacts, and ensure regulatory compliance.

An updated Construction Environmental Management Plan (CEMP) introduced clearer construction phasing, expanded roles including an Environmental Clerk of Works, and stricter noise and lighting controls. It added new protocols for waste segregation, emergency response, and monthly compliance reporting. Revised mitigation tables now cover climate change, heritage, ecology, and flood risk. The plan also includes enhanced soil and habitat protection, updated traffic management, and improved community safeguards. These changes aim to strengthen environmental oversight, reduce disruption, and ensure legal and ecological compliance throughout the construction phase.

Unresolved stakeholder concerns remain from key stakeholders including, National Highway (potential traffic and access impacts), Environment Agency (flood risk management and water quality safeguards) and Historic England (impacts on heritage assets and archaeological sensitivity). Nottinghamshire, Lincolnshire, West Lindsey, Newark & Sherwood and Bassetlaw LA's apprehensions remain over landscape and visual impact, community engagement and amenity concerns."

LCC also looked at the new visuals (photographs superimposed with the new infrastructure) from certain vantage points such as people's homes.

In summary, these amendments do not affect the public health comments made on the development so far. Overall, due to the scale of the development, the proximity to people's homes, and the lack of consideration of long-term public mental health, the overall impact on health and wellbeing is felt to be **negative**. We accept that some enhancements, such as the wildflower meadow to the north of North Clifton alongside the River Trent, will potentially have a positive impact.

REP1-074 – Joint Interrelationship Report

LCC welcomes the submission of an Inter-relationship report. Paragraph 1.1.2 identifies a 16km study area, this report does not appear to provide a justification for this cut off. Notably, Fosse Green Energy has been captured within this 16km search area, the Fosse Green Energy scheme forms part of the clustering of solar sites coming forward around the proposed Navenby substation, others include Springwell and Leoda. This calls into question whether these wider schemes should also fall under consideration for potential cumulative and inter-related effects.

There are three NSIP scale solar schemes proposed within Lincolnshire that have been omitted from Figure 1 and Table 1. Kilnside Energy Park, Leoda Solar Farm and Meridian Solar Farm should also be considered within this table.

Table 2 identifies predicted construction and operational timetables of other NSIP scale solar schemes identified with the 16km area selected by the applicant. Again, as stated above as Fosse Green has been identified, what is the justification for not also considering Leoda and Springwell both of which are in close proximity to Fosse Green. Has consideration been given to potential slippages in the timescales presented within this table? This is deemed particularly pertinent as the predicted construction start date identified for Cottam, Gate Burton and West Burton has already passed and construction has not yet commenced. This slippage in timescale, if leeway has not been built into the consideration of cumulative effects could result in unforeseen negative impacts as a higher number of construction periods could overlap that have not been assessed.

Yours faithfully ,

[REDACTED]

For [REDACTED]
Head of Planning