Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Kilnside Energy Park

Case Reference: EN0110022

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

31 July 2025

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1. INTRODUCTION

1.0.1 On 20 June 2025, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Kilnside Energy Park Limited (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Kilnside Energy Park (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.

1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:

https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110022/documents

1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.

1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has/ has not agreed to scope out certain aspects/ matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects/ matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/ matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.

1.0.6 The Inspectorate has published a series of advice pages, including 'Advice Note 7: *Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping* (AN7)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

'Nationally Significant Infrastructure Projects: Advice pages'

1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.0 Description of the proposed development

(Scoping Report Section 2)

ID	Ref	Description	Inspectorate's comments
2.0.1	Para 2.2.2.2	Construction compounds	The Scoping Report states that the proposed development would require temporary construction compounds within the site, however, the exact locations are yet to be determined. To ensure a robust assessment of likely significant effects, the ES should provide details regarding the number, location and dimensions of construction compounds and include these in any relevant assessment such as construction phase flood risk.
2.0.2	Para 2.2.6.2	Description of cable crossings	Natural and manufactured features such as ditches, watercourses, infrastructure and sensitive habitats have the potential to be crossed during construction of the proposed development. The ES should identify which features will be crossed and at what locations, with reference to any accompanying figure(s). The ES should describe the types of crossings that are required, their scale and dimensions and the nature of any associated construction works (for example the use of horizontal directional drilling). Where flexibility is deemed necessary this should be fully justified, and the ES should base assessments on the worst-case scenario and justify why this scenario would lead to the greatest environmental impact. Sufficient detail should be provided to inform a robust assessment of likely significant effects on relevant aspects/ matters, including ecological receptors.
2.0.3	Para 2.2.10.2	Lighting requirements	The ES should describe the lighting requirements for all elements and phases of the proposed development, and the measures proposed to minimise light spill on human and ecological receptors.
2.0.4	Section 2.3	Electricity export to National Grid	Whilst the Inspectorate notes that the timescales and final design of the proposed National Grid substation (either a new construction or alterations to the existing substation at Ryhall) are not yet known, the ES should clearly describe the relationship between the proposed development and

ID	Ref	Description	Inspectorate's comments
			connected projects. This should include the extent to which the proposed development is dependent on their delivery and the development timelines and anticipated consenting routes of the other projects, with an explanation of how these will be coordinated. The ES should describe how, if a new National Grid substation is used as the point of connection, the new substation is either proposed to be constructed in a way to facilitate the connection from the proposed development, or whether if constructed first, any additional works are then required to enable connection. The Scoping Report proposes that construction will begin in 2029 and operation of the site will begin in 2031 but the date of the connection agreement with National Grid is not given. The ES should ensure that the timeline of the proposed development and the Connection Agreement are described in appropriate detail, including how the ES has assessed any gaps between the conclusion of construction and the commencement for electricity export, including the evolution of the baseline and future baseline.
2.0.5	Section 2.5	Construction activities	The ES should include details of how the construction would be phased, including the likely commencement date, duration and location of the required construction activities and the required workforce. The ES should describe the assumptions regarding the assessment of the construction phase, including the proposed construction activities (for example, any proposed piling methods and whether open trench or trenchless techniques for crossings would be used), and the associated plant and machinery. The assessment should be based on a worst-case scenario.
2.0.6	Paras 2.5.5.2 and 14.6.3.1	Construction and operational access	The ES should describe the proposed site entrance(s) and the routes to be used for all vehicular access during construction and operation of the proposed development, and this information should be clearly presented on supporting plans within the ES. The ES should describe and assess the potential impacts (both positive and negative) associated with any improvements/ changes to the access routes which are required to either facilitate construction of the proposed development or are required for restoration purposes on completion of the works.

ID	Ref	Description	Inspectorate's comments
			For the assessment of impacts during construction, the ES should explain how the proposed access route(s) relate to sensitive receptors.
2.0.7	Section 2.6	Operational activities	The ES should describe the potential scope and duration of operational and maintenance works that would be required during the operation of the proposed development, including predicted vehicle movements and staffing numbers. The proposals for ongoing management and maintenance of the land around and under the solar photovoltaic modules should be confirmed in the ES, including any vegetation management and animal grazing. Any potential adverse impacts of maintenance activities should also be assessed in the ES where significant effects are likely to occur. Proposals for maintaining vegetation around easements and the Public Rights of Way (PRoW) within the application site should also be described.
2.0.8	Section 2.7	Decommissioning activities	The ES should provide a proportionate description of the activities and works which are likely to be required to decommission the proposed development or extend its operational life, and the anticipated duration, including whether any additional works such as new haul roads or access points are required. The ES should clarify whether the site will be returned to its current use and condition, and infrastructure that is retained beyond the lifespan of the proposed development should be clearly distinguished.
2.0.9	Para 2.7.1.1	60-year operational lifespan	The Scoping Report explains that maintenance activities would involve the replacement of solar infrastructure including batteries during the proposed operational lifespan of 60 years. While there is potential for technological improvements to extend the design life of panels, the Inspectorate considers it likely that all panels and the Battery Energy Storage System (BESS) facility would have to be replaced at least once during the operational life of the proposed development. The ES should ensure that a worst-case scenario is assessed. Where there is the

ID	Ref	Description	Inspectorate's comments
			potential for comprehensive replacement of infrastructure during the operational lifespan of the proposed development this should be assessed in all relevant chapters. The ES should describe the scope and duration of the maintenance and replacement activities likely to be required, including predicted vehicle movements and staffing numbers. The ES should provide estimates of types and quantities of waste expected as well as an assessment of any likely significant effects associated with the generation and disposal of waste. The applicant should ensure that the operational lifespan assessed within the ES is consistent with any time limit specified within the draft Development Consent Order (dDCO). Where a time-limited consent is not being sought within the dDCO the ES should assume any Likely Significant Effects (LSE) would be permanent in nature. Paragraph 2.6.1.1 of the Scoping Report states that an Operational Environmental Management Plan (OEMP) would include control measures to ensure that no significant impacts would arise during the maintenance and replacement activities. The applicant should append a draft/ outline copy of the OEMP to the ES and demonstrate how it would be secured through the dDCO. Where the ES relies upon mitigation measures which would be secured through the OEMP, it should be demonstrated (with clear cross-referencing) where each measure is set out in the draft/ outline document.
2.0.10	Section 5.2.2	Flexibility and the use of a Rochdale Envelope approach	The Inspectorate notes the applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the proposed development. The Inspectorate expects that at the point an application is made, the description of the proposed development will be sufficiently detailed to include the design, size, capacity, technology and locations of the different elements of the proposed development. Where details are not yet known, the ES should set out the assumptions applied to the assessment in relation to these aspects. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development.

ID	Ref	Description	Inspectorate's comments
			The description should be supported (as necessary) by figures, cross-sections and drawings which should be clearly and appropriately referenced. Where flexibility is sought, the ES should set out and justify the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES.
2.0.11	Section 5.5	Mitigation and enhancement	The ES should identify where measures are considered to be mitigation for potential effects as a result of the proposed development, and where measures are enhancement compared to the existing baseline conditions. In relation to Biodiversity Net Gain (BNG), the ES should ensure that mitigation for loss of habitat is not double-counted as enhancement. The ES should also demonstrate how the mitigation hierarchy has been followed.

2.1 EIA Methodology and Scope of Assessment

(Scoping Report Sections 1, 3, 4 and 5)

ID	Ref	Description	Inspectorate's comments
2.1.1	Section 1.4.4	Transboundary effects	The Inspectorate on behalf of the SoS has considered the proposed development and concludes that the proposed development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision. Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', links for which can be found in paragraph 1.0.7 above.
2.1.2	Section 2.1.3	Grid cable route search area	The Inspectorate notes that that the current location of the point of connection to the National Grid is unknown and that the grid cable route search area is based on the currently available options. The Inspectorate advises that substantial changes to the boundary post-scoping may amend the consultees identified at the scoping stage. The applicant should consider how amendments to the boundary affects the statutory consultation requirements.
2.1.3	Section 2.2	Variable worst-case scenario where	The Scoping Report does not specify whether the ES will consider a variable worst-case scenario between chapters. Whilst the Inspectorate considers that the use of a variable worst-case scenario is an acceptable approach for NSIPs, each chapter should fully describe the worst-case scenario

ID	Ref	Description	Inspectorate's comments
		optionality is proposed	assessed within that chapter, with reference to design parameters or construction timings/ methodologies, with a justification for the scenario used.
2.1.4	Section 5.4	Application of the overarching methodology	The Scoping Report gives the overarching methodology proposed to be applied to the ES assessments. However, if the ES deviates from this overarching method within chapters, the ES should outline the reasons for this and detail the topic-specific methodology where required.
2.1.5	Para 5.4.2.4	Use of professional judgement	The ES should clearly identify where professional judgement has been relied upon to determine the level of significance of effects. Any use of professional judgement to assess significance should be fully justified within the ES.
2.1.6	Section 5.5	Monitoring of mitigation	The ES should identify and describe any proposed monitoring of adverse effects and how the results of such monitoring would be used to inform any necessary remedial actions.
2.1.7	Para 8.5.1.1	Age of desk-based research	The Scoping Report refers to data being obtained from Historic England in February 2024. The ES should use the most recent datasets available Where third-party data is used, the ES should provide a justification of the date of provision of this data for all relevant chapters where this is used.
2.1.8	All chapters	Use of criteria/ thresholds to scope out	The Scoping Report contains a number of instances where specific criteria are given in order to justify scoping a matter out. The ES should include a clear description of the source of guidance or other methodological matters used to identify these criteria.
2.1.9	All chapters	Assessment of a receptor within multiple chapters	The Inspectorate notes that throughout the Scoping Report there are examples where receptors or receptor groups are proposed to be assessed across multiple chapters. Where this is the case, the ES should provide a clear description of how and why the receptor is assessed within each chapter, or where required, provide a clear cross-reference to the relevant assessments. The ES should also include all relevant impacts in the assessment of cumulative and in-combination effects.

ID	Ref	Description	Inspectorate's comments
2.1.10	NA	Other assessments	The Scoping Report provides information regarding other assessments which are outside the scope of EIA (however noting that there are several consultation responses in appendix 2 relating to these assessments). These are: ▪ Habitats Regulations Assessment ▪ Biodiversity Net Gain ▪ Flood Risk Assessment ▪ Water Framework Directive (Water Environment Regulations) Where there may be linkages between these assessments and EIA aspects, such as biodiversity and water resources, references should be clearly set out in the ES.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Climate change resilience

(Scoping Report Section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Para 6.6.1.1 and tables 6-3 and 6-4	Climate change resilience (CCR) impacts during construction • increase in average temperatures and extreme heat events • increase in storm frequency and intensity • increase in heavy rainfall and the risk of flooding • increased risk of drought • sea level rise	The Scoping Report proposes to scope out CCR impacts during construction on the basis that climate change is unlikely to be significant during the two-year construction period, and that the risk of climate hazards will be managed through an outline Construction Environmental Management Plan (oCEMP) and through application of general health and safety practices. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page and agrees that this matter can be scoped out of further assessment, provided that mitigation proposed within the oCEMP is secured through the DCO. The Inspectorate notes that the potential effects of flooding will be assessed within the Flood Risk Assessment (FRA) to be submitted with the application, and are not included within the CCR chapter. The Inspectorate is content with this approach.
3.1.2	Table 6-3	In-combination climate impacts for all project phases:	The Scoping Report proposes to scope out an in-combination climate change impact assessment from the climate resilience chapter of the ES. This is on the basis that there is either limited potential for Likely Significant Effects (LSE) (heat events, storm

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		• increase in average temperatures and extreme heat events • increase in storm frequency and intensity • increase in heavy rainfall and the risk of flooding • increased risk of drought • sea level rise	frequency, drought), the use of embedded mitigation would prevent any LSE (heat events, drought), the impact would be assessed elsewhere (flood risk) or the risk is not relevant to the geographic area of the proposed development (sea level rise). The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page and agrees that this matter can be scoped out of further assessment.
3.1.3	Table 6-4	Climate change resilience during operation	The Inspectorate notes that some matters considered within the Major Accidents and Disasters long list (appendix D) may be of relevance to the assessment of CCR. The ES should specify all climate-related events that have been considered within the CCR assessment and ensure that this is consistent with the scope of major accidents and the other relevant technical chapters of the ES.
3.1.4	Table 6-4	Resilience to sea level rise – operation and decommissioning	The Scoping Report proposes to scope out this matter on the basis that the proposed development is not located in an area that is susceptible to sea level rise. Based on the geographic location of the proposed development, the Inspectorate is in agreement that sea level rise can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.1.5	Para 6.4.1.1	Operation of the proposed development beyond the 2080s	The Scoping Report proposes to use the 2050 – 2080s period for future climate change impacts. The Scoping Report however indicates, at paragraph 2.5.1.1, that construction is proposed from 2029 (at the earliest) and is proposed to last for 24 months. Considering a proposed operational lifespan of 60 years, and the subsequent decommissioning period, the proposed development would extend to the 2090s. The ES and relevant accompanying assessments should explain how the potential for climate change impacts and the requirement to design the proposed development to be resilient to these impacts beyond the 2080s has been assessed.
3.1.6	Table 6-3	Increased risk of drought	The ES should demonstrate how it has considered measures to reduce water use prior to or during drought periods, such as a reduced watering schedule of soft landscaping features, to avoid increasing local water demand during a period of water stress.

3.2 Greenhouse gases

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Table 7-7	Greenhouse Gas (GHG) lifecycle emissions stage A0 - pre construction	The Scoping Report proposes to scope out stage A0 as GHG emissions from preliminary studies and works are largely office-based and are assumed to be negligible. The Inspectorate is in agreement that this stage can be scoped out of further assessment.
3.2.2	Table 7-7	GHG lifecycle emissions stages B1 – operational use and B8 operational user activities	The Scoping Report proposes to scope out GHG emissions from operational use and operational user activities as emissions are anticipated to be negligible. The Inspectorate has considered the nature of the proposed development and anticipated operational works, and information provided in other relevant chapters such as transport and access, and is in agreement that these stages can be scoped out of further assessment. The ES should however include a description of the anticipated operational activities.
3.2.3	Table 7-7	GHG lifecycle emissions stage B6 and B7 - operational energy use and operational water use	The Scoping Report proposes to scope out GHG emissions from water and operational energy use as it is anticipated that there will be minimal operational energy use or water use associated with the proposed development. Considering the nature of the proposed development, the Inspectorate is in agreement with this approach in relation to GHG.
3.2.4	Table 7-7	GHG lifecycle emissions stage D (benefits and loads beyond the system boundary during the operational phase) – land use change and	In the absence of information such as evidence regarding the anticipated sequestration/ emissions relating to land use change, and the noted requirement in table 7-7 to undertake a qualitative assessment (as a minimum), the Inspectorate is not in a position to scope this matter out of the assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		displacement of carbon emissions from other energy sources	The ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE. The Scoping Report indicates that there will be impacts to GHG emissions associated with land use change and carbon sequestration potential in future years. The information in this row of the table is not clear, as the first column indicates that this is relevant to "benefits and loads beyond the boundary". Whilst a more detailed description is given in table 7-4 which refers to land use change and carbon displacement, the ES should be clear whether this category assesses GHG emissions resulting from activities within the boundary of the site, or outside the boundary of the site. The ES should be clear about the timeframe for "future years", and this should align with the proposed operational lifespan of the proposed development.
3.2.5	Table 7-7	GHG lifecycle emissions stage D (benefits and loads beyond the system boundary during the operational phase) – land use change and displacement of carbon emissions from other energy sources	The Scoping Report states that this is proposed to be scoped out of the assessment, however, provides a limited justification and then states that "it is proposed that a qualitative assessment is undertaken to understand potential impact of GHG emissions associated with the change of carbon sinks e.g. removal or addition of vegetation associated with the construction of the Proposed Development". As the Scoping Report notes that a qualitative assessment is required, the Inspectorate is not in agreement that this matter can be scoped out. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE. The ES should also be clear about the scale of potential carbon sequestration as a result of the proposed development. For example, further details about the planting proposals should be included in an outline Landscape and Ecological Management Plan (oLEMP). The applicant should consider that any planting for the purposes of carbon sequestration may take years to perform such a purpose, and the disturbance of the ground during construction and decommissioning may cause GHG emissions which may negate any sequestration.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			In relation to carbon sequestration, land use change and displaced emissions from other sources, the Inspectorate is also unclear why a qualitative assessment is proposed for these, when quantitative methods are available and are regularly provided as part of GHG assessments.

ID	Ref	Description	Inspectorate's comments
3.2.6	Para 7.4.4.4	Use of UK carbon budgets in the assessment of GHG	The Inspectorate considers that it is unclear from the Scoping Report whether the assessment proposes to report the contribution of the proposed development to the relevant UK carbon budgets, as paragraph 7.4.4.4 states that this is of "limited value" but also "will be used to provide context". Unless specifically agreed otherwise with consultees, the Inspectorate considers that the ES should consider the relevant UK carbon budgets.
3.2.7	Para 7.5.2.2	Future baseline for GHG emissions	The Scoping Report indicates that indirect GHG emissions will decline for the future baseline. It does not indicate by what factor this decline is projected to take, or how this will be included within the assessment methodology. If (any) decline is included within the assessment methodology, it should be clearly explained in the ES.
3.2.8	Para 7.6.1.2	PAS 2080 life cycle assessment	The Scoping Report uses the PAS 2080 specification to assess the proposed development's GHG emissions. The Inspectorate considers that the Scoping Report gives an outline description only of the activities or processes included or excluded for each of the project life cycle stages. The ES should ensure to explain terminology from this specification so that the ES can be easily understood as a stand-alone document. In particular, the life cycle stages should be explained in more detail specific to the proposed development, and the ES should ensure to provide a full list the potential impacts scoped into or out of assessment for each category.

3.3 Cultural heritage

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Table 8-2	Construction phase impacts: • historic landscape character (solar development site and grid cable route)	The Scoping Report proposes to scope out historic landscape character during construction as significant effects are unlikely due to the short-term and reversible nature of these changes once construction activities cease. The Inspectorate notes that the Scoping Report proposes to scope in landscape and visual impacts during construction. Given the potentially similar impacts and receptors, and the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.3.2	Table 8-2	Operational phase impacts: • designated built heritage assets and conservation areas (grid cable route only) • non-designated built heritage assets (solar development site and grid cable route)	The Scoping Report proposes to scope out this matter for the grid cable route only during operation on the basis that grid connection cable assets will be below ground and therefore will not be visible during operation. With reference to the consultation responses in appendix 2 from Lincolnshire County Council and Rutland Council, the Inspectorate considers that as the proposed development will be operational for 60 years, that potential impacts may occur as a result of the required level of operational maintenance throughout solar development site and grid cable route, including the requirement for potential replacement of all solar and associated infrastructure at least once during the operational phase.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		• archaeological heritage assets (solar development site and grid cable route) • unrecorded archaeology operation (solar development site and grid cable route) • historic landscape character – operation (grid cable route only)	In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. The ES should include an assessment of these effects or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.3.3	Table 8-2	Decommissioning phase impacts: • designated built heritage assets and conservation areas (solar development site and grid cable route) • non-designated built heritage (solar development site and grid cable route)	The Scoping Report proposes to scope out this matter on the basis that it is unlikely that the decommissioning phase would result in additional significant effects than those resulting from construction and operational phases, or impacts would be temporary in nature, and any potential impacts will be avoided through measures sets out in an outline Decommissioning Environmental Management Plan (oDEMP), therefore significant effects are not anticipated. The Inspectorate notes that in paragraph 8.6.4.1 the decommissioning works may take approximately 24 months and there are a number of heritage assets shown adjacent to the solar array and cable areas as shown in appendix A, figures 8.1 and 8.2. With reference to the consultation responses in appendix 2 from Lincolnshire County Council and Rutland Council, the Inspectorate considers that noise, vibration, dust, traffic, lighting and visual disturbance associated with decommissioning could impact on the setting of these types of heritage assets.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		• archaeological heritage assets (solar development site and grid cable route) • unrecorded archaeology (solar development site and grid cable route) • historic landscape character (solar development site and grid cable route)	Additionally, the Inspectorate notes that other topic chapters which may lead to ground disturbance or visual impacts typically scope in the decommissioning phase. In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope this matters out from the assessment. The ES should include an assessment of these effects or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.3.4	Section 8.5	Registered battlefields	The Inspectorate notes the heritage assets listed in the existing baseline in the Scoping Report. However, it appears that the Battle of Losecoat Field (also referred to as the Battle of Empingham) is not listed in the existing baseline. The ES should include an assessment of impact to registered battlefields within the study area where LSE are likely to occur.
3.3.5	Para 8.8.1.1	Construction vibration and other direct impacts to heritage and archaeological assets	At Table 8-2, the Scoping Report proposes to scope in the construction phase for relevant designated built heritage assets and conservation areas, non-designated built heritage assets, and archaeological assets. However, the Scoping Report also proposes to scope out direct effects to heritage assets outside of the site boundary, and indirect effects during construction. No specific justification appears to be provided for scoping out direct impact to assets outside of the site boundary (for example, construction vibration). Paragraph

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			8.8.1.1 also refers to visual intrusion and noise only for heritage assets beyond the site boundary. The Inspectorate is therefore not in agreement to scope this out of the assessment as insufficient information or clarity is provided. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE. For the avoidance of doubt the ES should identify and assess both direct and indirect effects on the historic environment, and define what is considered as a direct or indirect effect.

ID	Ref	Description	Inspectorate's comments
3.3.6	Section 8.4.3	Archaeological investigations	The Scoping Report states that trial trenching across the solar development site will be undertaken where a geophysical survey identified notables features. It is unclear why archaeological investigations are not currently proposed for the grid cable route especially given that the cables will remain in situ following decommissioning of the site. The ES should justify the extent of extent of archaeological surveys and explain why the baseline can be considered robust. Efforts should be made to agree survey methodologies and coverage with the relevant consultation bodies and evidence of this should be provided within the ES.
3.3.7	Section 8.2	Study area	The Scoping Report states there are 500 metre (m) and 1 kilometre (km) (non-designated sites) and 1km and 2km (designated sites) study areas for the grid cable route and Solar Development area respectively, and a flexible approach of a 5km study area for high-value assets. The Inspectorate notes there are several conservation areas beyond the 2km study area it is unclear whether the 5km flexible study area would include these conservation areas.

ID	Ref	Description	Inspectorate's comments
			The applicant should ensure the study area is sufficiently robust to include sensitive areas and/or important heritage assets particularly when considering adverse impacts on their setting. The ES should include an assessment of this matter, or the information required to demonstrate the absence of a likely significant effect such as agreement from relevant consultation bodies.

3.4 Ecology and biodiversity

(Scoping Report Section 9 and appendix B)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Para 9.4.3.1	Ecological features of a negligible importance	The Scoping Report proposes to scope out any species of a negligible importance unless they have a specific legal protection or are subject to legal controls. Provided that the ES demonstrates evidence that the species are of a negligible importance, the Inspectorate is in agreement that this matter can be scoped out of further assessment.
3.4.2	Para 9.4.3.2	Ecological features of a local importance	The Scoping Report proposes to scope out ecological features of local importance where there is a specific technical justification to do so. Whilst the Inspectorate notes that this justification has not been provided within the Scoping Report, the Inspectorate is in agreement to scope out receptors of a local importance, provided justification is given within the ES.
3.4.3	Table 9-6	International Statutory Designated Sites within 10km of the Site – all project phases: • Grimsthorpe Special Area of Conservation (SAC) • Barnack Hills & Holes SAC • Baston Fen SAC	The Scoping Report proposes to scope out this matter on the basis that the distance and intervening land between the SACs and the solar development and cable route area is sufficient whereby there are no impact pathways for likely significant effects (LSE) to occur in terms of EIA. The Inspectorate agrees that these sites can be scoped out of further assessment on this basis.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Table 9-6	National and local important statutory designated sites within 2.5km of the (solar and/ or grid cable route) site – during operation only • Newell Wood Site of Special Scientific Interest (SSSI) • Clipsham Old Quarry and Pickworth Great Wood Site SSSI • Bloody Oaks Quarry SSSI • Ryhall Pasture and Little Warren Verges SSSI • East Wood, Great Casterton SSSI • Holywell Banks SSSI • Tickencote Marsh SSSI • Tolethorpe Road Verges SSSI • Great Casterton Road Banks SSSI	The Scoping Report proposes to scope these sites out from further assessment. However, no specific justification is given as to why this has been scoped out during operation in table 9-6 and the potential operational impacts section 9.6.3. In the absence of information demonstrating no LSE, and absence of information such as evidence demonstrating clear agreement with relevant statutory bodies (the applicant's attention is drawn to the responses from Natural England and the Environment Agency in appendix 2), the Inspectorate is not in a position to scope this matter out. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		• Shacklewell Hollow SSSI	
3.4.2	Table 9-6	National and local important statutory designated sites within 2.5km of the solar development site only - (All project phases for the grid cable route) (Operation only for the solar development site): • Empingham Marshy Meadows SSSI	Where the site is located within 2.5km of the solar development site only, the Inspectorate is in agreement that impacts from the grid cable route can be scoped out for all phases. In relation to the solar development site, the Scoping Report proposes to scope these sites out from further assessment. However, no specific justification is given as to why this has been scoped out during operation in table 9-6 and the potential operational impacts section 9.6.3. In the absence of information demonstrating no likely significant effects, and absence of information such as evidence demonstrating clear agreement with relevant statutory bodies (the applicant's attention is drawn to the responses from Natural England and the Environment Agency in appendix 2), the Inspectorate is not in a position to scope this matter out for sites within 2.5km of the solar development site. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.4.3	Table 9-6	National and local important statutory designated sites within 2.5km of the grid cable route only- (All project phases for the solar development site) (Operation only for the grid cable route):	Where the site is located within 2.5km of the grid cable route only, the Inspectorate is in agreement that impacts from the solar development site can be scoped out for all phases. In relation to the grid cable route, the Scoping Report proposes to scope these sites out from further assessment. However, no specific justification is given as to why these have been scoped out during operation in table 9-6 and the potential operational impacts section 9.6.3. In the absence of information demonstrating no LSE, and absence of information such as evidence demonstrating clear agreement with relevant statutory bodies (the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		• Castle Bytham Quarry SSSI • Swinstead Valley SSSI • Grimsthorpe Park SSSI • Stanton's Pit Local Nature Reserve (LNR)	applicant's attention is drawn to the responses from Natural England and the Environment Agency in appendix 2), the Inspectorate is not in a position to scope this matter out for sites within 2.5km of the grid cable route. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.4.4	Table 9-7 and table 9-10	Ancient woodland within 1km of solar development site and grid cable route – operation only	The Scoping Report proposes to scope this matter out. However, no supporting evidence has been provided to justify scoping out operational phase effects on ancient woodland within 1km. The Inspectorate notes in appendix B: Preliminary Ecological Appraisal (PEA), submitted with the Scoping Report, at paragraph 4.4.1.1 there are multiple parcels of ancient woodland within 1km. This includes ancient woodland adjacent to the solar area and within the grid cable route area. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.4.5	Para 9.8.1.4 and table 9-10	Ancient woodland over 1km from the site – all project phases	The Scoping Report proposes to scope this matter out because the solar development site and grid cable route are not connected by continuous woodland or other relevant habitat to ancient woodland beyond 1km and it is considered unlikely that impacts to relevant mobile species such as birds, bats or highly mobile invertebrates would occur beyond this distance.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate agrees that this receptor can be scoped out oof further assessment.
3.4.6	Table 9-7 and 9-10	Local Wildlife Sites (LWS) within 1km of solar development site and grid cable route – operation only	The Scoping Report proposes to scope this matter out. However, no supporting evidence has been provided to justify scoping out operational phase effects on LWS. The Inspectorate notes in appendix B: PEA submitted with the Scoping Report, at table 4 several LWS are identified, of which 10 are stated as '0m' distance from the solar development site, and 4 others within 20m. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies (the applicant's attention is drawn to the responses from Natural England and the Environment Agency in appendix 2), the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.4.7	Para 9.8.2.4	Invasive nonnative species (INNS)	The Scoping Report seeks to scope out as assessment of INNS, and states that "in the event that no (or very limited) further findings are made, the potential for INNS will be managed through measures included in the oCEMP, oLEMP and oDEMP to be submitted with the application". The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page, and agrees that this matter can be scoped out of further assessment on these grounds.
3.4.8	Table 9-8 and 9-10	Priority habitats during operation only: • arable field margins • hedgerows	The Scoping Report proposes to scope these habitats out for the solar development site for the operational phase. However, no specific justification is given as to why this has been scoped out during operation in tables 9-8 and 9-10 and the potential operational impacts section 9.6.3. In the absence of information demonstrating no LSE, and absence of information such as evidence demonstrating clear agreement with relevant statutory bodies (the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		• standing open water (ponds) • deciduous woodland	applicant's attention is drawn to the responses from Natural England and the Environment Agency in appendix 2), the Inspectorate is not in a position to scope this matter out. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.4.9	Table 9-9 and 9-10	Protected species for operation only: Table 9-9 • Great crested newts • Badger Table 9-10 • amphibians • invertebrates	The Scoping Report proposes to scope this matter out. However, no specific justification is given as to why this has been scoped out during operation in tables 9-9 and 9-10 and the potential operational impacts section 9.6.3. In addition, table 9-5 states that further badger and amphibian/ great crested newt (GCN) surveys are required, and therefore it is not clear how these receptors can be scoped out at present. The Inspectorate also notes that some surveying at the solar development site was undertaken outside of the usual survey season. In the absence of information demonstrating no LSE, and absence of information such as evidence demonstrating clear agreement with relevant statutory bodies (the applicant's attention is drawn to the responses from Natural England and the Environment Agency in appendix 2), the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.4.10	Table 9-10	Protected species during all project phases: • aquatic fauna • otter	The Scoping Report proposes to scope these protected species out on the basis that the preliminary ecological appraisal did not find evidence of these species within the solar development area nor suitable habitats to support these species. However, the Inspectorate notes that some surveying at the solar development site was undertaken outside of the usual survey season.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		• reptiles • water vole	In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies (the applicant's attention is drawn to the responses from Natural England and the Environment Agency in appendix 2), the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.4.11	Table 9-10	Indirect (heat and electromagnetic field) impacts to fish and aquatic species	Table 9-5 of the Scoping Report states that waterbodies within the solar development area are restricted to ponds which are unlikely to support notable fish populations. No further surveys are proposed, and therefore fish species been scoped out of further assessment in table 9-10. However, the Inspectorate notes that table 16-11 of the Scoping Report states that "an impact risk assessment on the risks associated with magnetic fields on fish and a monitoring plan will accompany the application where any below ground electric cables present a risk to fish". On the basis of the noted requirement to undertake an assessment of impacts to fish species, and in the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE. Where embedded mitigation has been relied on to avoid LSE (such as the siting of the solar development sites and grid cable route) this should be described in the ES.

ID	Ref	Description	Inspectorate's comments
3.4.12	Para 9.5.2.12	Grid cable route ecology surveys	The Inspectorate notes that the baseline findings of the PEA are based on the solar development site only and subsequent targeted surveys will be undertaken for the grid cable route once that area has been defined. The ES should ensure that the impact on all relevant protected habitats and species are assessed and surveyed.
3.4.13	NA	District level licencing (DLL) scheme	The ES should confirm whether the applicant intends to offset the effects of the proposed development on great crested newts (GCN) by obtaining a licence through the Natural England (NE) DLL scheme. The Inspectorate understands that the DLL approach includes strategic area assessment and the identification of risk zones and strategic opportunity area maps. The ES should include information to demonstrate whether the proposed development is located within a risk zone for GCN. If the applicant enters into the DLL scheme, NE will undertake an impact assessment and inform the applicant whether their scheme is within one of the amber risk zones and therefore whether the proposed development is likely to have a significant effect on GCN. The outcome of this assessment will be documented on an Impact Assessment and Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the findings in the ES, including information on the proposed development's impact on GCN and the appropriate compensation required.
3.4.14	NA	Confidential annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder

ID	Ref	Description	Inspectorate's comments
			explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.5 Water environment and flood risk

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	Tables 10-11 to 10-14	Flood risk	The Scoping Report proposes to scope out flood risk from the water environment chapter, as it is to be provided as a separate appendix to the ES. Whilst the Inspectorate considers that this aligns with the solar scoping advice page and raises no objection to this approach, the ES should carefully consider the terminology used, as it could be implied that the applicant is not proposing to assess flood risk at all as it is referred to as being scoped out. For the avoidance of doubt, a flood risk assessment must be provided with the application.
3.5.2	NA	Wastewater	The water environment chapter and project description do not include any information on the anticipated management of wastewater/ sewage during construction, operation and decommissioning. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Description	Inspectorate's comments
3.5.3	Para 10.4.6.7	Differentiation between flood zones 3a and 3b and potential loss of	The ES should differentiate between flood zones 3a and 3b in order to determine which parts of the site are located in areas considered as "high probability of flooding" and "functional floodplain". Where development is to be located within flood zone 3, then an assessment of the floodplain loss should be made and floodplain compensation provided. This should include consideration of the cumulative losses from solar panel mountings.

ID	Ref	Description	Inspectorate's comments
		functional flood plain	Essential infrastructure located within flood zone 3 should be designed and constructed to remain operational and safe in times of flood and throughout the lifetime of the proposed development, taking account of climate change.
3.5.4	NA	Environment Agency data	The Environment Agency (EA) has published new flood and coastal erosion risk data in 2025 following the release of its "national assessment of flood and coastal erosion risk in England 2024". Further updates are also expected to follow. The applicant should ensure that assessments take account of updated data sets as these become available through Defra's data services platform. Where relevant, the applicant is encouraged to consult with the EA to determine the implications for project design and the scope of assessments.

3.6 Landscape and visual amenity

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Para 11.8.1.3 and Table 11-17	National Character Area (NCA) 74: Leicestershire and Nottingham Wolds	The Scoping Report proposes to scope out this matter for all project phases on the basis that significant effects on this NCA are unlikely as it is located only on the western part of the study area. However, the proximity of this NCA to the proposed development is not reported in the Scoping Report text or figures. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Description	Inspectorate's comments
3.6.2	Para 11.2.3.8	Study area	The Scoping Report states the study area is up to 3km from the solar development site. The Inspectorate notes that a 'flexible' (up to 5km study area) is proposed for the Cultural Heritage assessment in paragraph 8.2.1.4 and it is not explained why these study areas are different when there is the potential for the same impacts such as visual and impacts to setting. The ES should provide a justification of the study areas used, and where possible, ensure a consistent study area where receptor groups are assessed across multiple chapters (based on the identified zone of theoretical visibility).
3.6.3	Para 11.8.1.8	Preliminary list of sensitive receptors	The Inspectorate notes that the list of potential receptors does not appear to include businesses or other non-residential land uses such as schools.

ID	Ref	Description	Inspectorate's comments
		for views and visual amenity	The ES should demonstrate how it has assessed potential impacts to all relevant receptor types and provide a justification where a potential receptor is excluded from the assessment.
3.6.4	Figures 11.2 and 11.3	Viewpoints	The Scoping Report provides a selection of viewpoints for the preliminary zone of theoretical visibility (ZTV) assessment which are provided in figures 11.2 and 11.3. The Inspectorate notes these viewpoints do not take into account the location of infrastructure as this has yet to be determined. The selection viewpoint locations for the assessment as currently shown in figures 11.2 and 11.3 should be consulted and agreed on where possible with relevant consultation bodies to ensure these are comprehensive. The ES should explain the process used to determine appropriate viewpoints through the consultation process.

3.7 Noise and vibration

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Para 12.2.2.6, 12.8.2.10 and Table 12-1	Noise from operational traffic	The Scoping Report proposes to scope out the impacts of noise resulting from operational traffic on the basis that traffic trips to and from the proposed development would be infrequent. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page and agrees that this matter can be scoped out of further assessment. The Inspectorate agrees with this approach but considers that the ES should include an estimate of the number or frequency of expected operational traffic trips to support this position.
3.7.2	Table 12-1	Vibration from construction traffic – haul roads only	The Scoping Report proposes to scope this out based on the intention to keep the roads in a good state of repair, and to locate the haul roads away from residential properties. However, no information has been provided as to the location of the haul roads, and the Inspectorate is unclear how vibration from haul roads can be separated out from the wider assessment of construction vibration. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.7.3	12.8.2.12 and Table 12-1	Vibration from operational traffic	The Scoping Report proposes to scope this out on the basis that operational traffic would be minimal and for maintenance purposes only, and therefore it is considered that vibration from operational traffic is unlikely to result in significant effects.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page and agrees that this matter can be scoped out of further assessment. However the ES should include an estimate of the number or frequency of expected operational traffic trips to support this position.
3.7.4	Table 12-1	Vibration from decommissioning traffic	The Scoping Report seeks to scope out decommissioning vibration as it is anticipated to be lower or equal to construction. Whilst the Inspectorate does not disagree that decommissioning vibration is likely to be similar to construction, the assessment should be consistent, and noting that table 12-1 proposes to scope in vibration from construction traffic, the Inspectorate considers that vibration from decommissioning traffic should also be scoped in.
3.7.5	12.8.2.7 and Table 12-1	Operational noise from the grid cable route	The Scoping Report proposes to scope this matter out as based on the current proposed development description, there will be no noise emitted from the Grid Connection Cable within the grid cable route. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page and agrees that this matter can be scoped out of further assessment. The ES project description should however confirm that the final design does not include any infrastructure such as substations or other uses which may emit noise. If any noise-emitting sources are designed into the grid cable route, any LSE arising from operational noise should be included within the assessment unless otherwise agreed with the relevant consultees.
3.7.6	Paras 12.2.2.2 and 12.8.2.11	Operational vibration	The Scoping Report proposes to scope out operational vibration as the nature of the plant is unlikely to transmit any appreciable vibration into the ground and the distances to any sensitive receptors will attenuate any residual vibration. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page and agrees that this matter can be scoped out of further

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			assessment. The ES project description should however include an estimate of the anticipated operational vibration emissions to support this position.

ID	Ref	Description	Inspectorate's comments
3.7.7	Section 12.2.2	Study area	The Scoping Report proposes a study area around the site of 0.3km for construction noise, 0.1km for construction vibration and 1km for operational noise. The Inspectorate is unclear as to why the study area for construction, and similarly for decommissioning noise, is proposed to be smaller than the study area for operation, as the proposed development description in the Scoping Report indicates that the noise and vibration being emitted from activities during construction and decommissioning may be greater than during operation. In addition, the list of sensitive receptors given at paragraph 12.5.1.5 includes residential receptors between 300m and 1km distance from the proposed development, so it is unclear why these would be excluded from the construction phase assessment. The ES should provide a detailed justification of this approach, and where possible, agreement with relevant consultees.
3.7.8	Para 12.4.3.3	Establishing the threshold of potential significant noise effects	The Scoping Report proposes to use the 'ABC' method of Annex E of BS 5228-1 to establish the threshold of potential significant noise effects. The ES should provide more detail on this methodology and assume that the ES can be read as a standalone document.
3.7.9	Para 12.5.1.4	Rail noise - Noise Important Areas (NIAs)	The Scoping Report proposes to exclude three rail noise NIAs from the noise assessment based on the fact that these NIAs relate directly to the impacts of railway noise associated with

ID	Ref	Description	Inspectorate's comments
			the operational East Coast Mainline rail line, and the proposed development does not propose to transport materials via the rail network. Whilst the Inspectorate is in agreement that the proposed development will not increase noise from railway use, the ES should demonstrate how these NIAs (and any other NIAs such as those relating to roads) have been considered as part of any baseline data and any other relevance to the assessments.
3.7.10	Para 12.5.1.6	Ecological receptors	The Scoping Report indicates that there are ecological receptors which may be sensitive to noise impacts, and that there is no modelling proposed to assess noise impact for ecological receptors. The Inspectorate considers that the ES should include noise modelling for all sensitive receptors.
3.7.11	Para 12.6.2.1	Implications of design changes	It is noted from the proposed development description that fixed panels are proposed. In the event that tracking panels are used, the ES should include this within the noise and vibration assessment (and any other relevant assessments).
3.7.12	Para 12.7.1.4	Measures to control noise and vibration	The Scoping Report proposes to use measures to control noise and vibration from annex B of BS 5228-1 and Section 8 of BS 5228-2 as mitigation. The ES should list these measures to allow a full description of the proposed mitigation to be understood.

3.8 Socioeconomics

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	Table 13-8	All project phases – indirect effects on local businesses, community and recreational facilities	The Scoping Report proposes that for businesses other than agricultural, effects are expected to not be significant given the management plans that the applicant is committed to. The Inspectorate is in agreement that this matter can be scoped out from further assessment, however. the ES should also define what is considered as a direct or indirect effect.
3.8.2	Table 13-8	All project phases - development land – site allocations	The Scoping Report seeks to scope this matter out as no direct effects are anticipated on development allocations. Provided that the ES details the relevant site allocations on the site and surrounding area to demonstrate that there are no allocations that may be impacted, the Inspectorate is in agreement that this matter can be scoped out from further assessment.
3.8.3	Table 13-8	All project phases - Mineral Safeguarded Areas	The Scoping Report proposes to scope out an assessment of mineral resources as an individual chapter, as it will be provided as an appendix to the planning statement. Whilst the Inspectorate is in agreement with the approach to include as a separate assessment and not as an individual chapter (as it notes that the topic is not proposed to be scoped out in its entirety, only as an individual chapter), it is unclear why this assessment is proposed to be in the planning statement rather than the ES. The ES should deal with all relevant LSE unless otherwise agreed with relevant statutory consultees.
3.8.4	Table 13-8	Users of PRoW and other promoted recreational routes – operation only	The Scoping Report proposes to scope this matter out but notes that "It is proposed that these are scoped out for the operation phase although the ES will acknowledge any temporal duration of effects that continue into the operational phase where this is appropriate".

			On the basis that the Scoping Report acknowledges effects during the operational stage, the Inspectorate is not in agreement that this can be scoped out.
3.8.5	Table 13-8	All project phases - effects on tourism attractions/ facilities	The Scoping Report seeks to scope this matter out as no known (specified) tourist attractions or facilities in the site or surrounding area The Inspectorate is in agreement that this can be scoped out of further assessment. However, the Inspectorate considers that this relates to specified land uses for tourism purposes, rather than general tourism such as walking or other visits to the general area. As such the ES should demonstrate how it has considered effects on the wider tourism industry.
3.8.6	Table 13-8	All project phases - effects on accommodation	The Scoping Report seeks to scope this matter out as a relatively small number of the workforce likely to be required during peak construction would need to stay locally. The Inspectorate is in agreement that this can be scoped out of further assessment.
3.8.7	Table 13-8	All project phases - other socioeconomic effects related to the local population (amenity effects)	The Scoping Report seeks to scope this matter out as any other matters would be assessed in other relevant technical chapters. Provided that the ES signposts to these assessments and their relevance to the socioeconomics chapter, the Inspectorate is in agreement that this can be scoped out of further assessment.
3.8.8	NA	Cumulative effects	With reference to responses provided in appendix 2 of this Scoping Opinion from the relevant local authorities, the ES should demonstrate how it has considered the potential for multiple non-significant effects from projects alone to accumulate to a potential significant effect on the receptors identified (for example, several overlapping projects requiring a high amount of temporary accommodation).

ID	Ref	Description	Inspectorate's comments
3.8.9	NA	NA	NA

3.9 Transport and access

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Para 14.8.1.14 and Table 14-5	Hazardous loads - construction	The Scoping Report proposes to scope out this matter during construction on the basis that the proposed development is not expected to generate or attract hazardous loads. The Inspectorate has considered the characteristics of the proposed development and considers that this matter can be scoped out of further assessment. However the ES should explain the measures employed to ensure safe vehicular transport of components, such as panels and batteries, to and from the site.
3.9.2	Para 14.8.2.2 and Table 14-5	Operational phase: • severance • delay • non-motorised user amenity • fear and intimidation • road user safety • hazardous loads	The Scoping Report proposes to scope out this matter during operation on the basis that there will be low volumes of operational traffic associated with the proposed development. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page. The Inspectorate therefore agrees that this matter can be scoped out of further assessment, subject to the ES confirming the expected frequency of vehicles and the type of maintenance visits required, based on a worst-case scenario and a justification as to why this level of operational traffic would not give rise to a significant effect.
3.9.3	Para 14.8.3.4 and Table 14-5	Decommissioning phase: • severance • delay	The Scoping Report proposes to scope out this matter during decommissioning on the basis that forecast trip generation would be similar or less than what is expected during construction and that an oDEMP and a final DEMP will be secured to manage traffic measures and minimise disruption.

		• non-motorised user amenity • fear and intimidation • road user safety • hazardous loads	The Inspectorate notes that indicative traffic numbers for light duty vehicle (LDV) movements during construction are not provided. There appears to be no evidence to support the claim that traffic numbers during decommissioning would be lower than during construction. As such, the Inspectorate is not in a position to scope this matter out at this stage. The ES should include an assessment to identify the types of traffic generated during construction and decommissioning along with the estimated numbers of traffic movements or evidence of agreement with relevant consultation bodies that this matter can be excluded and the absence of a LSE.
3.9.4	Para 14.8.1.14	Abnormal Indivisible Loads (AIL)	The Scoping Report states that AIL will be required during the construction phase, and that this will be assessed in the transport assessment. For clarity, the ES should assess the potential for increased congestion and increased journey times/ distance to road users due to road closures or diversions required for AILs during construction. The ES should also confirm if any works are required to facilitate access for AIL within the affected road network or other local access routes.

ID	Ref	Description	Inspectorate's comments
3.9.5	Para 14.2.1.2	Study area	The Scoping Report states that the extent of the study area has not been fully defined. The ES should confirm the final study area for the assessment of traffic and transport and explain how it has been selected. In addition to engagement with relevant consultation bodies, consideration should also be given to industry guidance, the extent of the potential impacts and likely receptors, both human and ecological. A plan illustrating the extent of the study area, and the expected route(s) of construction traffic, should be included in the ES.

3.9.6	Para 14.2.1.3 and figure 14.1	Baseline PRoW	The Scoping Report shows that the baseline transport network includes PRoWs, but the information provided does not clearly identify extent of PRoWs which could be affected. The ES should appropriately characterise the baseline for PRoW and describe any alterations to PRoW during all phases of the proposed development.
3.9.7	N/A	Traffic surveys	It is unclear whether traffic/ PRoW surveys are to be proposed to inform the baseline. The Inspectorate notes that the study area has yet to be determined and the extent of affected transport networks is unknown. The ES should provide a robust baseline, including the use of traffic surveys if appropriate. Efforts should be made to agree the methodology with relevant highway authorities.

3.10 Agriculture and soils

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Para 15.6.4.1 and table 15-4	Agricultural holdings - operation	The Scoping Report proposes to scope out an assessment of effects on landowners who have granted voluntary purchase of the land to the applicant, but to scope in tenant farmers who may be impacted. The Inspectorate is in agreement with this approach where a voluntary agreement is in place provided that the ES cross-refers to the evidence of these voluntary agreements in the DCO application documents. The Inspectorate also considers that it is appropriate to assess agricultural businesses in a single chapter rather than repeating the assessment between the socioeconomics and agricultural land chapters.
3.10.2	Table 15-4	Agricultural holdings - decommissioning	The Scoping Report seeks to scope this matter out, however provides a limited justification. The Inspectorate considers that any potential impacts to agricultural land holdings scoped in for the construction and operation phases are likely to be applicable to the decommissioning phase, as the land will not be fully returned to agriculture until the conclusion of decommissioning. The Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.10.3	Para 15.6.2.3 and	Agricultural land - operational and maintenance works	The Scoping Report seeks to scope this out on the basis that maintenance works or replacement of components during the operational phase are not likely to adversely impact soils, and standard soil management measures will be applied through the OEMP.

	table 15-4		With reference to the consultation responses in appendix 2 from Lincolnshire County Council and Rutland Council, the Inspectorate considers that as the proposed development will be operational for 60 years, potential impacts may occur as a result of the required level of operational maintenance throughout the solar development site and grid cable route, including the requirement for potential replacement of all solar and associated infrastructure at least once during the operational phase. In the absence of information such as evidence demonstrating clear agreement with relevant consultation bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. The ES should include an assessment of these effects or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.10.4	NA	Assessment of changes to field drainage patterns	The ES should, where relevant, assess the impacts from the potential removal of existing field drainage as part of the proposed development.

ID	Ref	Description	Inspectorate's comments
3.10.5	NA	Agricultural land	The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives.

3.11 Air Quality

(Scoping Report Section 16.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Para 16.2.5.5 and table 16-2	Air quality impacts from construction and decommissioning traffic	The Scoping Report proposes to scope out the impact on air quality from heavy duty vehicle (HDV) construction traffic on the basis that average daily flows are expected to be below 100 HDV movements, and the Environment Protection UK (EPUK) Institute of Air Quality Management (IAQM) guidance requires an air quality assessment for changes in more than 100 HDV movements per day. However, it is also noted in this paragraph that a technical appendix will be provided to present an assessment of construction traffic emissions. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page and agrees that this matter can be scoped out of further assessment. However, the ES project description should provide details of the anticipated vehicle movements during construction. In the event that there are likely to be over 100 HDV movements per day, the ES should include an assessment of any LSE associated with this. The Scoping Report refers to air quality guidance in the ecology chapter but does not include any specific information on ecological receptors or an assessment of air quality impacts on ecological receptors. The ES should include information on the human and ecological receptors included within the assessment in order to make a comprehensive assessment of any impacts. The Inspectorate's position on this matter is also considered relevant to the decommissioning phase.

3.11.2	Para 16.2.5.1 and table 16-2	Air quality impacts from operational traffic	The Scoping Report proposes to scope out the impact on air quality from LDV operational traffic on the basis that average daily flows are expected to be below 500 LDV movements, and the EPUK IAQM guidance requires an air quality assessment for changes in more than 500 LDV movements per day. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page and agrees that this matter can be scoped out of further assessment. However, the ES project description should provide details of the anticipated vehicle movements during construction. In the event that there are likely to be over 500 LDV movements per day, the ES should include an assessment of any LSE associated with this.
3.11.3	Para 16.2.5.2 16-2	Air quality impacts from other operational activities (emissions, dust emissions)	The Scoping Report proposes to scope out emissions from equipment and dust generation during operation based on the type of maintenance activities and the absence of significant combustion sources such as the use of generators. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page and agrees that this matter can be scoped out of further assessment. However the ES should provide details of the operational activities including, where required, panel or other infrastructure replacement.

ID	Ref	Description	Inspectorate's comments
3.11.4	NA	Guidance	The applicant's attention is drawn to the Defra advice '$PM_{2.5}$ Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have been identified and how action has been taken to minimise emissions of $PM_{2.5}$ or its precursors.

3.12 Glint and glare

(Scoping Report Section 16.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	16.3.4.4 and Table 16-3	Glint and glare – all phases	The Scoping Report proposes to scope out the impacts of glint and glare (as an individual chapter) on sensitive receptors on the basis that the outlined design measures and screen planting will reduce potential impacts and therefore significant effects are unlikely. The Inspectorate notes that a separate glint and glare assessment with be appended to the ES. The Inspectorate is content with provision of a glint and glare assessment as an appendix. However, the glint and glare assessment should assess the worst-case scenario and provide a description of any relevant mitigation measures and safety considerations. In the event that glint and glare effects are identified, it should be used to inform the relevant chapters in the ES, in particular for the landscape and visual impact assessment chapter.

ID	Ref	Description	Inspectorate's comments
3.12.2	NA	NA	NA

3.13 Ground conditions

(Scoping Report Section 16.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Table 16-5	All project phases: • geology • land contamination	The Scoping Report proposes to scope out an assessment of geological resources as an individual chapter, as it will be provided as a Preliminary Risk Assessment (PRA) to be provided as an appendix. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page and agrees that this matter can be scoped out of further assessment on the grounds that the topic will not be scoped out in its entirety, only as an individual chapter. However, in the event that the PRA identifies potential LSE then the ES should include an assessment of those LSE.
3.13.2	Table 16-5	Mineral resources – all phases	The Scoping Report proposes to scope out an assessment of mineral resources as an individual chapter, as it will be provided as an appendix to the planning statement. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page and agrees with the approach to include as a separate assessment and not as an individual chapter (as it notes that the topic is not proposed to be scoped out in its entirety, only as an individual chapter). However, it is unclear why this assessment is proposed to be in the planning statement rather than the ES. The ES should deal with all relevant LSE unless otherwise agreed with relevant statutory consultees.

ID	Ref	Description	Inspectorate's comments

3.13.3	NA	Geotechnical hazards and other ground conditions not related to geology, contamination or mineral resources	The Scoping Report does not detail how the ES proposes to assess geotechnical hazards or other ground conditions. Whilst the Inspectorate considers (and with reference to the information provided on major accidents and disasters) that these are typically assessed at the detailed design stage, the ES should include detail of how these are proposed to be assessed.

3.14 Human health

(Scoping Report Section 16.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Section 16.5	Human health: • environmental impacts • traffic • greenspace and physical activity • access and connectivity • economic employment impacts	The Scoping Report proposes to scope out a specific chapter on human health on the basis that the relevant technical chapters of the ES will consider the potential effects of human health within their own assessment. The Inspectorate is in agreement that a standalone assessment on human health is not required. The ES should however clearly signpost where impacts relating to all relevant aspects of physical and mental health have been considered in the relevant technical chapters.

ID	Ref	Description	Inspectorate's comments
3.14.2	NA	NA	NA

3.15 Major accidents and disasters

(Scoping Report Section 16.6 and appendix D)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Table 16-9	Assessment of major accidents and disasters (MAD) as a standalone chapter	As detailed below, the Inspectorate is not in agreement that all aspects of MAD can be scoped out of the assessment. However, the Inspectorate is in agreement that a standalone chapter for MAD is not required. Where the applicant chooses to assess the relevant MAD in other aspect chapters, this should be clearly stated in the relevant chapter(s) and/ or the other topic chapter. As noted in the Health and Safety Executive response in appendix 2 of this Opinion, the assessments should include both the vulnerability to MAD and the potential for the proposed development to cause MAD.
3.15.2	Appendix D	Geological disasters: • landslides • earthquakes • sinkholes	The Scoping Report proposes to scope out landslides and sinkholes as these are not likely to occur due to the flat nature of the land on which the proposed development is located and risks from sinkholes and landslides will be considered as part of the geotechnical design. In addition, the risk from earthquakes is considered unlikely given the proposed development is not within a geological active area. The Inspectorate has considered the characteristics and location of the proposed development, and considers that this approach and the information provided aligns with the solar scoping advice page. The Inspectorate agrees that this matter can be scoped out of further assessment.
3.15.3	Appendix D	Hydrological disasters: • floods	The Scoping Report proposes to scope out flooding on the basis that the assessment of flooding will be produced in the FRA rather than in the major accidents and disasters assessment.

		• limnic eruptions • tsunami/ storm surge	The Inspectorate raises no objection to this approach, so on the basis that an FRA is provided with the ES, the Inspectorate is in agreement to scope this out from the major accidents and disasters assessment. The Scoping Report proposes to scope out limnic eruptions and tsunami/ storm surges from hydrological disasters on the basis that there are no limnically active lakes, and the proposed development is not in a coastal location. The Inspectorate has considered the characteristics and location of the proposed development, and considers that this approach and the information provided aligns with the solar scoping advice page. The Inspectorate agrees that this matter can be scoped out of further assessment.
3.15.4	Appendix D	Meteorological hazards: • blizzards • cyclonic storms • drought • thunderstorms • hailstorms • heat waves • tornadoes • wildfires • (natural) air quality events	The Scoping Report proposes to scope out meteorological hazards on the basis that either risks are considered unlikely or where there is the potential for meteorological hazards to occur, these will be managed to reduce the possibility of these hazards occurring. Additionally, meteorological hazards from blizzards, hailstorms, droughts, cyclonic storms and tornadoes are scoped out as it is considered there is little risks from these meteorological hazards on the proposed development. The Scoping Report notes potential risks to the proposed development associated with thunderstorms, heatwaves, wildfires and air quality events. However, these risks would be managed via construction, operation and decommissioning management plans, the design of the proposed development, in-built safety systems, and a battery safety management plan to protect against the risk of fire from heatwaves and wildfires, thereby reducing the risk of meteorological hazards occurring. The Inspectorate has considered the characteristics and location of the proposed development, and considers that this approach and the information provided aligns with the solar scoping advice page. The Inspectorate agrees that this matter can be scoped out of further assessment.

			The ES should identify any mitigation measures relied on to avoid LSE and explain how these would be delivered. The ES should also signpost where these impacts are assessed in other relevant chapters and documents.
3.15.5	Appendix D	Transport: • road accidents • rail accidents • aircraft disasters	The Scoping Report proposes to scope out rail accidents on the basis that rail lines are not located within 500m of the solar development site and no direct effects on rail lines from the grid cable route are expected as these will be avoided through the ongoing design and citing of the electrical connection. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page. On the basis that no direct effects are expected to rail lines, the Inspectorate agrees that rail accidents can be scoped out for further assessment. However, the ES should where possible, demonstrate consultation and agreement with the rail operators as the Inspectorate notes the close proximity of the East Coast Mainline Railway to the grid cable route search area. The Scoping Report notes the potential for increased road accidents from an increase in HGVs and general traffic during construction and decommissioning. However, the Inspectorate notes that the risks associated with an increase in traffic will be assessed in the Transport and Access and Water Environment chapters. On the basis that the potential for road accidents will be assessed in these topic chapters, the Inspectorate agrees to scope this matter out of the MAD chapter. The Scoping Report states the potential for an increase in aircraft disasters from glint and glare which will be considered within a technical appendix to the ES. The Inspectorate notes that risks from glint and glare will be identified and mitigated for by design of the proposed development. However, The Inspectorate draws the applicant's attention to the Ministry of Defence's consultation response (see appendix 2 of this Opinion) on the possibility of inference to safeguarding and surveillance radar due to the location of the solar development area, and the potential for bird strike risk. On the basis of the potential identified risk to aviation receptors, the Inspectorate is not currently in agreement that aviation receptors can be scoped out of the assessment. Accordingly the ES should include an assessment of these matters or the information

			referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
3.15.6	Appendix D	Engineering accidents failures: • bridge failure • tunnel failure or fire • dams/ reservoir failure • mast/ tower collapse • building failure or fire • utility failure	Engineering accidents/ failures from bridge, tunnel and building failures and fires as well as mast and tower collapse are proposed to be scoped out as no bridge, tunnel, mast or tower works are proposed and no demolition of buildings is necessary. The Inspectorate has considered the characteristics and location of the proposed development, and considers that this approach and the information provided aligns with the solar scoping advice page. The Inspectorate agrees that this matter can be scoped out of further assessment. The Scoping Report proposes to scope out dam/ reservoir and flood defence failure on the basis that the MAD assessment of these matters will be produced in the FRA rather than in the MAD assessment. On the basis that an FRA is provided with the ES, the Inspectorate can agree to scope this out from the MAD assessment. The Scoping Report notes potential for utility failure from disruption to infrastructure, however the proposed development would utilise its own separate electrical connection, and a desk-based study would be undertaken to identify any constraints, therefore mitigating against potential impacts to utilities. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page. On the basis that the ES sets out the findings of the desk-based study and signposts to where any required mitigation measures are embedded within the design or secured through the DCO, the Inspectorate agrees this matter can be scoped out of further assessment.
3.15.7	Appendix D	Industrial accidents: • defence industry • energy industry (fossil fuel) • nuclear power	Defence, energy, nuclear power, chemical and manufacturing industries are proposed to be scoped out as there are no locations of facilities in proximity to the proposed development. Whilst the Inspectorate notes that Woolfox quarry (mining industry) is located 120m from the solar development site, this has also been scoped out due to the distance between the site and proposed development and therefore no credible impact pathway exists.

		• oil and gas refinery/ storage • food industry • chemical industry • manufacturing industry • mining/ extractive industry • terrorism, crime and civil unrest • war	Terrorism, crime, civil unrest and war are scoped out as this kind of infrastructure is unlikely to be targeted and the proposed development is no more vulnerable to war than other infrastructure. The Inspectorate has considered the characteristics and location of the proposed development, and considers that this approach and the information provided aligns with the solar scoping advice page. The Inspectorate agrees that this matter can be scoped out of further assessment.
3.15.8	Appendix D	Disease: • human • animal • plant	The Scoping Report proposes to scope out human and animal disease on the basis that the proposed development is no more vulnerable to effects from these than any other infrastructure. The Inspectorate has considered the characteristics and location of the proposed development, and considers that this approach and the information provided aligns with the solar scoping advice page. The Inspectorate agrees that this matter can be scoped out of further assessment. There is the potential for plant disease due to biosecurity threats. However, the Inspectorate notes that the planting design will take account of this risk by using a wider mix of planting species. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page. On the basis that the ES reports the potential risks, that these are assessed in the relevant related chapters and any relevant mitigation is secured through relevant management plans; the Inspectorate is content to scope this matter out of the MAD assessment.
3.15.9	Appendix D	Operational/ process hazards	There is the potential for operational hazards from the risk of fire from the battery storage. However, the Inspectorate notes that these risks will be managed via in-built cooling systems, separation between battery banks to isolate fires, and the provision of an outline

			Battery Safety Management Plan (oBSMP) to reducing the risk of operational fire hazards. It is also noted that some aspects such as fire water/ pollution run off and water storage volumes are proposed to be assessed where relevant in other aspect chapters. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page. On the basis that these mitigation and management measures these are secured through the DCO, and evidence of agreement in safety measures is provided with relevant consultation bodies, the Inspectorate can agree to scope this matter out of the assessment of MAD. The Inspectorate expects that the information on the fire risk associated with battery storage facilities and relevant mitigation, such as fire-fighting and containment measures on the environment will be set out in the oBSMP.
3.15.10	Appendix D	Unexploded ordnance (UXO)	There is the potential for UXO risks during the construction phase of the proposed development. The Inspectorate notes that a Preliminary Risk Assessment (PRA) report, to include UXO, will be included with the ES and any mitigation measures outlined in the CEMP. On the basis that these mitigation and management measures these are secured through the DCO, the Inspectorate can agree to scope this matter out.

ID	Ref	Description	Inspectorate's comments
3.15.11	NA	NA	NA

3.16 Telecommunications, television reception and utilities

(Scoping Report Section 16.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.16.1	Table 16-10	Telecommunications, television reception and utilities – all phases	The Scoping Report proposes to scope out the impacts of telecommunications, television reception and utilities on the basis that design, avoidance and proposed mitigation measures will reduce potential impacts and therefore significant effects are unlikely. Considering the nature of the proposed development, the Inspectorate is content to scope this matter out provided that the ES sets out the findings of the proposed consultation and desk-based study and how this has been taken into account in the design to mitigate potential impacts.

ID	Ref	Description	Inspectorate's comments
3.16.2	NA	NA	NA

3.17 Electromagnetic fields

(Scoping Report Section 16.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.17.1	Table 16-11	Electromagnetic fields (EMF)	The Scoping Report proposes to scope out the impacts of electromagnetic fields on the basis that design, avoidance and proposed mitigation measures will reduce potential impacts and therefore significant effects are unlikely. However, the Inspectorate notes the underground cables will be up to 400 kilovolts (kV) in voltage and at present it is unclear where the substation connection point will be. Due to the potential cables exceeding 132kv, the Inspectorate is not in agreement that effects arising from EMF can be scoped out. The ES should address the risks to human and ecological receptors (and any other relevant receptors such as aviation and radar as noted in table 3.15 above) arising from EMF to the extent that it is relevant to the nature of the development, taking into account relevant technical guidance (for example, from the International Commission on Non-ionizing Radiation Protection), and where significant effects are likely to occur.

ID	Ref	Description	Inspectorate's comments
3.17.2	NA	NA	NA

3.18 Materials and waste

(Scoping Report Section 16.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.18.1	Table 16-12	Materials and waste - all phases	The Scoping Report proposes to scope out this matter on the basis that the proposed development will generate minimal amounts of waste during all phases and all materials used will be manufactured off-site. The Scoping Report does not mention the anticipated quantities of waste, and the Inspectorate considers that significant amounts of waste may arise during construction, operation (such as infrastructure replacement due to the 60-year operational phase) and decommissioning (such as disposal of infrastructure) and further information is required to demonstrate that this would not lead to a LSE. On this basis, the Inspectorate does not agree to scope this matter out. The ES should include estimates, by type and quantity, of expected quantities and types of waste produced during the construction, operation and decommissioning phases and assess any subsequent potential LSE arising from the transportation and disposal of waste (including but not limited to air quality, traffic and noise).

ID	Ref	Description	Inspectorate's comments
3.18.2	Para 16.9.1.3	Waste Electrical and Electronic Equipment (WEEE) directive and return of solar panels	The Scoping Report refers to the legal requirement for solar panel manufacturers to take back used solar panels under the WEEE directive. The ES should clarify if it is reliant on this as a proposed mitigation measure.

3.19 Cumulative and in combination effects

(Scoping Report Section 17 and appendix C)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.19.1	NA	NA	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.19.2	Throughout	Study areas for cumulative effects assessments	In relation to the chosen study areas for cumulative effects, the Inspectorate notes a number of responses in appendix 2 of this Opinion referring to the number of NSIPs (and other large scale projects) in the wider regional area. The ES should demonstrate how the chosen study areas have been decided upon given the potential for a wide geographical area or impacts.
3.19.3	NA	NA	The Inspectorate wishes to draw the applicant's attention to a number of consultation responses in appendix 2 of this Opinion which refer to specific schemes recommended to be included within the cumulative effects assessment, with particular reference to Mallard Pass Solar Farm given the proximity to the proposed development. The applicant should make efforts to agree the plans and projects to be included in the cumulative effects assessment with relevant consultees.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The relevant parish council	Essendine Parish Council
	Stamford Town Council
	Uffington Parish Council
	Castle Bytham Parish Council
	Colsterworth and District Parish Council (also including North Witham parish)
	Stoke Rochford and Easton Parish Council
	Corby Glen Parish Council
	Witham on the Hill Parish Council
	Edenham, Grimsthorpe, Elsthorpe and Scottlethorpe Parish Council
	Irnham Parish Council
	Little Bytham Parish Council
	Tallington Parish Council
	West Deeping Parish Council
	Greatford Parish Council
	Braceborough and Wilsthorpe Parish Council
	Carlby Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	South Witham Parish Council
	Swayfield Parish Council
	Swinstead Parish Council
	Easton on the Hill Parish Council
	Barnack and Pilsgate Parish Council
	Bainton and Ashton Parish Council
	Wothorpe Parish Council
	Ketton Parish Council
	Exton and Horn Parish Council
	Empingham Parish Council
	Greetham Parish Council
	Stretton Parish Council
	Great Casterton Parish Council
	Little Casterton Parish Council
	Ryhall Parish Council
	Cottesmore Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	The Forestry Commission East & East Midlands
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant internal drainage board	Black Sluice Internal Drainage Board
	Upper Witham Internal Drainage Board

SCHEDULE 1 DESCRIPTION	ORGANISATION
	North Level Internal Drainage Board
	Welland and Deepings Internal Drainage Board
The Canal and River Trust	The Canal and River Trust
The relevant Highways Authority	Rutland County Council Highways
	Lincolnshire County Council Highways
	National Highways
Integrated Transport Authorities (ITAs) and Passenger Transport Executives (PTEs)	Cambridgeshire and Peterborough Combined Authority
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
The relevant policy authority	Leicestershire Police and Crime Commissioner
	Lincolnshire Police and Crime Commissioner
	Cambridgeshire Police and Crime Commissioner
The relevant ambulance service	East of England Ambulance Service
	East Midlands Ambulance Service
The relevant fire and rescue authority	Leicestershire Fire and Rescue Service
	Lincolnshire Fire and Rescue Service
	Cambridgeshire Fire and Rescue Service

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

'Statutory undertaker' is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Cambridgeshire and Peterborough Integrated Care Board
	NHS Lincolnshire Integrated Care Board
	NHS Leicester, Leicestershire and Rutland Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East Midlands Ambulance Service NHS Trust
	East of England Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
	Network Rail
Canal Or Inland Navigation Authorities	The Canal and River Trust
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Anglian Water
	Severn Trent
	Cadent Gas Limited

STATUTORY UNDERTAKER	ORGANISATION
The relevant public gas transporter	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity generator with CPO Powers	Mallard Pass Solar Project
	High Dyke (Mill Farm)* (Island Green Power)

STATUTORY UNDERTAKER	ORGANISATION
The relevant electricity distributor with CPO Powers	National Grid Electricity Distribution (East Midlands) Limited
	Advanced Electricity Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	National Grid Electricity Transmission Plc

STATUTORY UNDERTAKER	ORGANISATION
The relevant electricity transmitter with CPO Powers	National Grid Electricity System Operation Limited

* Island Green Power considers that they are not a consultation body as defined in the EIA Regulations, see Appendix 2 below.

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
South Kesteven District Council
Rutland County Council
Lincolnshire County Council
Harborough District Council
Melton Borough Council
Newark and Sherwood District Council
North Kesteven District Council
South Holland District Council
Peterborough City Council
Leicestershire County Council
North Northamptonshire District Council
Cambridgeshire County Council
Norfolk County Council
North East Lincolnshire Council
North Lincolnshire Council
Nottinghamshire County Council

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Cambridgeshire and Peterborough Combined Authority

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Anglian Water
Black Sluice Internal Drainage Board
Braceborough and Wilsthorpe Parish Council
Cambridgeshire County Council
Carlby Parish Council
Colsterworth and District Parish Council
Cottesmore Parish Council
Essendine Parish Council
Exton and Horn Parish Council
Forestry Commission
Great Casterton Parish Council
Greatford Parish Council
Health and Safety Executive
High Dyke (Mill Farm) – Island Green Power
Historic England
Leicestershire Police and Crime Commissioner
Lincolnshire County Council
Lincolnshire Fire and Rescue Service
Melton Borough Council
Ministry of Defence
National Highways
NATS En-Route Safeguarding

Natural England
Newark and Sherwood District Council
Norfolk County Council
North Kesteven District Council
North Lincolnshire Council
Rutland County Council
Ryhall Parish Council
Severn Trent
South Kesteven District Council
Southern Gas Networks Plc
The Canal and River Trust
The Environment Agency
Uffington Parish Council
United Kingdom Health Security Agency
Upper Witham Internal Drainage Board
Welland and Deepings Internal Drainage Board
Witham on the Hill Parish Council

Gary Chapman
EIA and Land Rights Advisor
The Planning Inspectorate

By email: kilnsideenergypark@planninginspectorate.gov.uk

Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6XU

www.anglianwater.co.uk
strategicgrowth@anglianwater.co.uk

Our ref: Kilnside Energy.Scoping.ds.257

17 July 2025

Dear Gary,

KILNSIDE ENERGY PARK - EIA SCOPING NOTIFICATION AND CONSULTATION – ANGLIAN WATER RESPONSE

Thank you for requesting Anglian Water's comment on the scoping report for the above project. Anglian Water is the statutory sewerage undertaker for the proposed project area and the statutory water provider for most of the site, with the exception of land south of the A1. This response is in our statutory capacity regarding water resources, water supply network, water recycling centres (WRCs), water recycling assets and the sewer network, as well as the related role of surface water drainage. Anglian Water also has a statutory function working with local planning authorities on Local Plans and in this role, we have been supporting the production of Local Nature Recovery Strategies which will assist planning authorities and developers in locating and designing development and land use changes which can deliver nature recovery at a landscape scale.

Anglian Water works to support the construction and operation of nationally significant infrastructure projects that are planned, assessed and managed in accordance with the Water Industry Act 1991. We would expect the next stages of the project to include reference to any existing infrastructure managed and owned by Anglian Water, and any provision of replacement infrastructure or requirements for new infrastructure. Given the scale of the project, we would also support the project in enabling delivery of measures set out in emerging Local Nature Recovery Strategies.

Anglian Water works with developers, including those constructing projects under the 2008 Planning Act, to ensure requests for alteration of sewers, wastewater and water supply infrastructure are planned to be undertaken with the minimum of disruption to the project and communities. We would encourage on-going engagement to ensure that AWS and the developer have reached agreement on the approach to assets and connections well in advance of the submission of the draft DCO for examination.

3. THE PROPOSED DEVELOPMENT

The project area [Figure 1.3 Local Authority Boundaries) is located within Rutland Council and South Kesteven Council areas. Anglian Water is the statutory sewerage undertaker for the entire project area, and the statutory water supply undertaker for all three grid connection routes (Figure 1.4) and 80% of the solar development site. The remaining 20% of the solar development site which is south of the A1 and north of Grantham Lane and a small area north of Tickencote is outside our statutory water boundary.

There are multiple underground assets which serve the villages in the area including Pickworth, Tickencote, Great Casterton on the edge of the solar development site and Castle Bytham, Ryhall and Uffington in proximity to the three cable routes (Figures 2.2a and 2.2b). We note that none of the figures identify these assets or above ground assets such as Water Recycling Centres. Anglian Water now requires NSIP promoters to fund a clash detection assessment at the early stages of projects to design out the need to divert or otherwise impact our assets. This is to:

- reduce the impact on local communities from additional works including works on local roads, where the majority of Anglian Water assets are located outside of settlements,
- reduce the risk of damage to water and wastewater assets and so the interruption of service/ supply and prevent pollution or local flooding, and
- reduce the project's environmental impacts including diversion works which themselves have carbon impacts.

Site access and tracks:

The asset clash assessment (construction and operation) is required to be funded by the NSIP promoter. The assessment will if instructed by the promoter consider the site access locations and localised potential construction stage impacts on Anglian Water assets. We would advise the access locations (construction and operation) either seek to avoid the interface or undertakes necessary construction measures to protect our asset and these mitigation measures are set out in the outline Construction Environment Management Plan (oCEMP) supporting the Environmental Statement (ES). Anglian Water's template Protective Provisions set out the standard minimum stand- off distances that construction should be from a range of sizes of Anglian Water's underground assets. The full Protective Provisions will be provided when the NSIP promoter contacts Anglian Water to arrange an Inception meeting and to agree the scope of works for the asset clash assessment. Contact can be made via:

strategicgrowth@anglianwater.co.uk

Maps of AWS's underground assets are available to view at the following link:

http://www.digdat.co.uk/

Anglian Water requires that the following standoff distances are applied for working each side of the medial line of our pipes. The text is drawn from our template Protective Provisions which will need to be agreed with Anglian Water prior to the DCO submission.

(a) 4 metres where the diameter of the pipe is less than 250 millimetres.
(b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and
(c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres.

These distances are a starting point for design, assessment, diversion or mitigation measures including crossing provisions.

Surface Water Drainage:

It is noted (para. 2.2.12.1) that an outline Drainage Strategy will be prepared and submitted with the DCO application. This is welcomed by Anglian Water. Surface water flood risk arising from the construction and operation of the site should be mitigated through the drainage hierarchy. Anglian Water supports the use of SuDS (para 2.4.1.2, page 27, bullet 5and 6.7.1.3) to reduce and attenuate any increased run-off risk to the neighbouring settlement that could impact the hydraulic capacity of our combined network. No surface water flows will be accepted into our foul drainage or combined network. This includes the construction stage of the development and as such Anglian Water will oppose any general provisions in the order which seek to contact to the public sewer network.

Anglian Water supports the design of drainage systems to address the supply of water for fire suppression systems (para. 16.6.4.1) to mitigate the need for additional water resources. Any demonstrably necessary modifications to the land drainage systems should be designed to mitigate any potential unintended impacts on creating other water pathways that might impact on our sewer networks. Anglian Water does not accept that a pathway as envisaged in Table 16.4, Construction, point 5, is necessary and no runoff will be accepted into the public sewer network.

Temporary Construction Compounds:

We would advise that temporary construction compounds are carefully located, to minimise any impacts on our assets, particularly within the cable corridor. The removal of topsoil, creation of bell mouths and laydown areas for storing materials can increase risk to damaging our underground assets and the operation of our networks, including interruptions to supply. The NSIP promoter is advised that ground investigations for archaeology should be scoped to identify the location of underground utility assets including water and public sewer pipes.

Any temporary water or wastewater connections required to serve the compounds should be requested through our Inflow platform at an early stage, when designs are fixed, to ensure these can be planned for effectively. Our recommendation is that to reduce the need for temporary works with their attendant carbon impacts potable water and wastewater services are serviced by tankers during construction. With reference to any non-domestic water demands, please see our later comments.

https://inflow.anglianwater.co.uk/Login/Index?ReturnUrl=%2f

2.5 Development Programme

It is noted that the construction phase is expected to last 24 months from 2029. Anglian Water emphasises that early engagement with utility providers is a fundamental element of planning the specific construction details in the DCO application, particularly regarding any diversions.

Anglian Water has a considerable programme of investments in AMP8 (2025-2030) and will be managing the interfaces with our assets and diversions for a significant number of NSIPs within our region during the same period. Where interfaces/diversions cannot be avoided, we would recommend that NSIP Promoters that have a large number of Anglian Water assets (or assets of a strategic nature) interfacing with the Project, engage with us on the specific detail of these interfaces at an early stage, as this will help inform the extent of the order limits, should any diversions be required, and help to reduce delays later in the process when the project reaches delivery stage.

The level of engagement in pre-application will be agreed with the NSIP promoter once the Inception meeting referred to above has been taken place. On some solar schemes early engagement has effectively enabled the water and sewerage impacts to be descoped form the EIA and agreement reached ahead of DCO submission. Anglian Water's own programme of projects for AMP8 (2025-30) should be included with the projects long list of cumulative projects to be assessed in the EIA (Appendix C).

Paragraph 2.5.2 lists the typical construction activities including site preparation and establishment of construction compounds. Although drainage ditch crossings are referred it is unclear as whether this activity is to identify existing underground and overground utility interfaces. In either situation, Anglian Water would endorse this activity to ensure the protection of our assets and the safety of the construction team. We would advise on trial holes to ascertain the location of our assets where this will directly interface with construction activities, unless already identified through other surveys such as ground investigations.

Anglian Water supports the preparation of an outline Construction Environmental Management Plan (para 2.5.6.1) as an appendix to the PEIR and ES, and the identification of the processes that will be outlined therein, including utilities diversions and emergency response and contingency plans. This will help ensure robust measures are in place to manage the construction processes and should be consistent with the Protective Provisions for Anglian Water for inclusion in the DCO. As previously indicated, more detailed advice, technical assurance can be provided by Anglian Water at an early stage which will assist with measures for inclusion in the oCEMP to help de-risk the delivery of the project.

7. Greenhouse Gases

Anglian Water notes that all phases of the development have been scoped into the EIA in relation to GHG assessment. The carbon emissions regarding any required diversions of utilities or the provision of connections should be factored into the operational and capital carbon elements of the solar development sites and cable corridor route(s).

10. Water Environment and Flood Risk

The Anglian Water region is identified as 'seriously water stressed' in the Environment Agency's 2021 classification of water stressed areas. One specific point for the Environmental Statement (ES) therefore and in view of the potential impacts on water resources, is that the applicant is advised to consider the published Water Resources East Regional Plan which sets out the collective water companies position in the east of England. The Water Resource Management Plan (WRMP) for Anglian Water is available on our website and we would advise these documents are referenced in the data sources in 10.2.1.1. The AWS Non-Domestic Water Requests policy paper means that the project's ES will need to consider water resources and water efficiency and that a Water Resources Assessment (WRA) will be required to be produced by the applicant and agreed with Anglian Water if non-domestic water demand is likely to exceed 20m3/day. The WRA will need to address water and wastewater for the project's temporary construction compounds and activities as well for permanent operational sites including the onsite substation.

Anglian Water recommends that the WRA is an integral part of the Water Resources chapter of the ES (see 5.3 of the applicant's Scoping Report). There does not appear to be sufficient information on the project's water supply requirements during construction and operation to suggest that water resources should be scoped out. The flows needed to fill water storage tanks for example (if the Applicant decides not to use rainwater harvesting on site to meet this non potable demand) will need to be assessed by us to advise whether a supply is feasible when assessed in terms of the potential to jeopardise domestic supply or at a significant financial or environmental cost. The Water Resources Assessment (WRA) should set out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses.

Water Supplies:
The completion of the WRA will enable the project to demonstrate that it is maximising water efficiency and protection of finite water resources which are needed to support the region's growth - consistent with the Applicant's assertion that further details on public water supplies will be obtained to inform the ES from utility providers. The Applicant should confirm that there will be no temporary concrete batching facilities with consequent water demands and so not require an on-site non-domestic supply. Water requirements for firefighting measures and construction traffic (dust suppression/ wheel washing areas) should also be explained. Further advice on water capacity and options can be obtained by submitting a pre-development enquiry to the Pre-Development Team at: planningliaison@anglianwater.co.uk

We note that the potential impact of the project on groundwater and abstraction is yet to be assessed (para. 10.4.1.21). Anglian Water recommends that this assessment is conducted promptly to ensure that we and the Environment Agency can advise on design, layout and construction methodology changes to reduce the risk of impacts on water quality and the public water supply.

It is also noted (Table 10-10) that wastewater (sewers) will be reviewed at a later stage and so have not been scoped out. If after further design and assessment wastewater connection(s) is demonstrably required and cannot be managed through temporary measures such as self- contained on site welfare facilities, we would suggest that a pre-application is made to request a connection through our Inflow platform, so that connections can be appropriately planned for.

16. Other Environmental Topics

Anglian Water agrees that the potential effect is 'scoped in' on ground conditions (para 16.4.2.25) through the construction phase such as encountering contamination during construction works activities, and the potential effects on groundwater. This would address matters such as utilities strikes given the number of interfaces that potentially need to be managed once the cable corridor option has been confirmed.

We welcome the proposed measures (para. 16.4.3.1) to prevent infiltration/ run off to the sewerage network.

Anglian Water welcomes the recognition of the potential impact on utilities (paras. 16.6.4.1, bullet 3, 16.7.11 and Appendix C, Table 1, page D-7). We consider that until the clash assessment has been undertaken by Anglian Water then likelihood and magnitude impacts cannot be assessed and so it is not possible to scope out these impacts from the EIA.

Wastewater discharge:
It is noted in Table 16.8 that wastewater supplies have been scoped out as it is anticipated that wastewater disposal will be manged through temporary measures with no need to connect to existing sewerage network. We would suggest that this is confirmed at an early stage, or that a pre-application is made to request a connection through our Inflow platform, so that connections can be appropriately planned for.

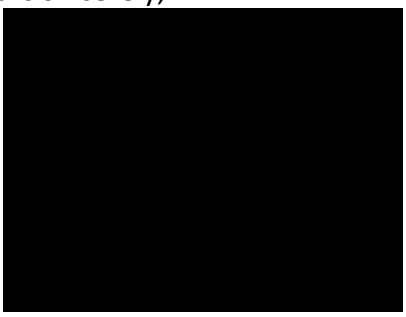
Next steps
Anglian Water would welcome the progression of discussions with the Applicant, in line with the requirements of the 2008 Planning Act and guidance. Experience has shown that early engagement and then agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination. Consultation at the statutory PEIR stage would in our view be too late to inform design and may result in objections and delays to the project, including potentially requests to change the project's Order Limits to ensure Anglian Water services to existing customers and to support growth are not prejudiced. As part of the wider progression of the project alongside the ES, Anglian Water recommends discussion on the following issues:

1. Impact of development on Anglian Water's water and water recycling assets.
2. The design of the project to minimise interaction with Anglian Water assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.
3. Requirement for potable and raw water supplies (if any) and the inclusion of the WRA in the PEIR.
4. Requirement for water recycling connections (if any).
5. Confirmation of the project's cumulative impacts (if any) with Anglian Water projects.

6. The Draft Development Consent Order (DCO), including draft Protective Provisions and requirements specifically to ensure Anglian Water's services are maintained during construction.

Advice on the form and content of suitable Protective Provisions in the draft Development Consent Order should be sought. Please do not hesitate to contact strategicgrowth@anglianwater.co.uk on these aspects or should you require clarification on the above response or during the pre- application to decision stages of the project.

Yours sincerely,



Darl Sweetland
Spatial and Strategic Planning Manager

From: Planning
To: Kilnside Energy Park
Subject: Re: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification
Date: 25 June 2025 12:33:56
Attachments: image001.png
image002.png
~WRD0002.jpg
Outlook-BSIDB LOGO.png
Guidance Sheet - Black Sluice.pdf

> You don't often get email from planning@blacksluiceidb.gov.uk. Learn why this is important

Good Afternoon

Thank you for your correspondence and also involving Black Sluice as a consultee.

Please see attached our guidance sheet which provides information regarding potential consents you may require and also some byelaws in relation to any site within 9M of any board-maintained watercourses.

Kind Regards

Tess

Tessa Manning

Planning & Enforcement Officer

Black Sluice Internal Drainage Board

Station Road, Swineshead, Boston, Lincolnshire, PE20 3PW

[redacted]

www.blacksluiceidb.gov.uk

From: TempUser
Sent: 23 June 2025 10:54
To: Planning
Subject: FW: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification

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From: Kilnside Energy Park
Sent: 23 June 2025 10:48
To: TempUser
Cc: Kilnside Energy Park

Black Sluice
Internal Drainage Board

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Lincolnshire
PE20 3PW

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mailbox@blacksluiceidb.gov.uk

GUIDANCE FOR PROPERTY OWNERS & DEVELOPERS

Internal Drainage Boards and Development Control

The Black Sluice Internal Drainage Board (the Board) is an independent authority constituted under the Land Drainage Act 1930, with duties "to exercise a general supervision over all matters relating to the drainage of land within its district".

The Board acts as a non-statutory consultee to Local Planning Authorities, but importantly the Board has its own statutory powers with respect to drainage which also determines how and if a development may proceed. The Board's current powers derive from the Land Drainage Act 1991 (LDA1991).

The Board also acts as an agent to the Lead Local Flood Authority (Lincolnshire County Council - LCC) for LDA1991 Section 23 consenting & enforcement matters, and as a non-statutory sub-consultee for matters regarding flood risk and surface water drainage.

How the Board appraises Properties or Developments

The following factors are considered by the Board when appraising proposed properties or developments:

- Rainfall Run-off and Surface Water Development Contributions
- Disposal of Foul or Dirty Water
- Discharge Outfalls
- Access to Watercourses
- Filling in or Culverting Watercourses
- Property Floor Levels
- Site Ground Level
- Environment and Biodiversity

Detailed guidance for each of these factors follows - **emboldened sentences** indicate the Board has statutory powers.

Application forms and other leaflets referred to may be obtained from the Board's offices (address above), or the Board's website.

SECTION 1 - RAINFALL RUN-OFF AND SURFACE WATER DEVELOPMENT CONTRIBUTIONS

The Board's prior written consent is required to increase the rate of rainfall run-off from a property or development.

The Board's Byelaw No. 3 states that:

No person shall, without the previous consent of the Board, for any purpose, by means of any channel, siphon, pipeline or sluice or by any other means whatsoever, introduce any water into the District or, whether directly or indirectly, introduce any water into the District or, whether directly or indirectly, increase the flow or volume of water in any watercourse in the District.

Where possible, sustainable methods of disposal should be used which do not adversely affect existing surface water management, nor adversely expose people or property to an increased risk of flooding. In most instances sustainable disposal will best be achieved by dealing with rainfall run-off at or as near as possible to source using Sustainable Drainage Systems (SuDS). SuDS is a presumption for all developments of 10 properties and above.

For example:

1. Rainwater recycling
2. Soakaways, Infiltration areas and Swales
3. Filter drains and porous pavements
4. Attenuation or balancing ponds

NB: Soakaways and infiltration systems should be designed and proved with a percolation test in accordance with BRE Digest 365 or other approved code. No discharge fee is required by the Board.

A Surface Water Development Contribution (SWDC) shall be payable to the Board for any discharge from any property or development.

Prior written consent is required from the Board where a development will result in an increase in the rate or volume of flows into ANY watercourse within the Board's district. One of the conditions imposed as part of any such approval is the payment of a surface water development contribution to the Board.

The charge is made to help fund the cost of improvements to the drainage network that are required to cater for increases in the rate and/or volume of surface water flows. Surface Water Development Contributions are payable on receipt of an invoice from the Board which will be issued within any consent granted. Consent shall not be interpreted as granted by virtue of this guidance document.

The contribution is calculated by:

- Determining the impermeable area of the site to be positively drained (in square metres, m^2)
- Establishing the charging band the impermeable area (in hectares) of the site that is to be positively drained will fall into
- Establishing the charging band the proposed discharge rate (in litres/second/impermeable hectare) will fall into

The current maximum charge applicable is **£129,456 per impermeable hectare** (£12.95 per m^2) for sites with less than 5ha of impermeable area proposing to discharge at an un-attenuated rate, with the rate decreasing proportionally for areas of 5ha and above.

Further details, including the charging bands and method of calculation, can be found on the Board's website.

NB: The Board cannot guarantee to accept any water if it is unfeasible to increase the capacity of the existing system. Where localised off-site works are required to any watercourse, then the improvement must be approved by the Board and paid for by the property owner/developer in addition to the development contribution. The Board may be prepared to carry out the work using its powers under the Land Drainage Act 1991 on a rechargeable basis.

Where the discharge is via a third party system, such as an LCC adopted highway or SUDs system, an Anglian Water surface water sewer, or an ordinary watercourse (including those maintained by the Board), then the permission of the relevant authority or landowner is required, and an additional discharge fee may be due.

SECTION 2 - DISPOSAL OF FOUL OR DIRTY WATER

The Board's prior written consent is required to discharge any water into any surface water system.

Foul or dirty water, including water from vehicle wash downs, shall NOT be discharged directly into a surface water system. Where a separate foul water system (i.e. Anglian Water) is not provided, then the water shall be treated before disposal.

If a property owner/developer wishes to make a discharge into *any* watercourse within the Board's district, then the consent of both the Board and the Environment Agency (EA) is required as follows:

a. *From the Board* - to allow an increase in flow into the drainage system *****
b. *From the EA* - who will agree the *quality* of the water to be discharged +

***** not required for discharges of *at or less than 1m^3/day* into a watercourse *not* maintained by the Board
\+ not required for discharges less than 5m^3/day

Septic tanks shall not discharge directly to a watercourse but to a soakaway system designed and proved to BRE Digest 365. Where soakaways are not suitable due to ground conditions, then owner will be responsible for emptying the tank as required.

If septic tanks are not approved by the EA, then a package treatment unit will be required; the Board recommends that, unless there is a 600mm freeboard from the unit outlet invert to normal water level, the unit should have a pumped discharge.

SECTION 3 - DISCHARGE OUTFALLS

The Board's prior written consent is required before any structure is placed in any watercourse, as per Section 23 of the Land Drainage Act 1991.

All outfalls shall have a suitable headwall installed to protect the banks from erosion. No part of the headwall unit or pipe end shall protrude beyond the profile of the bank in order that flails and weed cutting machinery is not obstructed. Suitable scour protection shall be placed below and/or in front of the headwall if necessary. Details of a suitable headwall can be obtained from the Board. A suitable non-return valve or spring-loaded flap is also recommended over the pipe end to prevent surcharging during periods of high water levels. Outfall connections into piped systems shall be to a manhole, although the use of a proprietary saddle connector may be permitted.

SECTION 4 - ACCESS TO WATERCOURSES FOR MAINTENANCE AND BOARD BYELAWS

No obstructions shall be placed in, over, under or within 9 metres of the edge of a Board-maintained watercourse without the prior written consent of the Board.

The Board's Byelaw No. 10 states:

"No person, without the previous consent of the Board, shall erect any building or structure, whether temporary or permanent, or plant any tree, shrub, willow or similar growth within 9 metres of the landward toe of the bank where there is an embankment or wall, or within 9 metres of the top of the batter where there is no embankment or wall, or where the watercourse is enclosed within 9 metres of the enclosing structure"

The Board has a separate policy leaflet regarding this byelaw.

This byelaw allows the Board unrestricted access to carry out maintenance of watercourses vested with the Board under the LDA1991. Maintenance includes:

- Annual maintenance works – flailing (mowing) of alternate banks and removal (cutting) of weed from the bed of the watercourse. Weed is deposited on the bank to decompose naturally. All open watercourses.
- Desilting (dredging) – removal of siltation from the bed of open watercourses. Selected watercourses on a 5-10 year rolling programme.
- Jetting/CCTV – removal of siltation from piped watercourses by high pressure jetting, and CCTV inspections to assess condition. Selected watercourses on a 10 year rolling programme.

IMPORTANT – Development of land adjacent to Board-maintained watercourses

The Board is subject to a licence issued by the Environment Agency (EA) for the removal of siltation from its maintained systems, whether open or piped, as the arisings are classed as waste material.

Where silt is removed from open watercourses, normal practice is for the silt to be deposited on adjacent agricultural land, where the arisings are left to dry and then spread across the adjacent field. Where land has been or is planned for development, whether residential or industrial or business use, the Board will deposit silt within the 9 metre byelaw distance.

IF DEVELOPERS DO NOT WISH FOR SILT ARISINGS TO BE PLACED ON LAND ADJACENT TO THEIR DEVELOPMENTS, THEN THEY WILL BE RESPONSIBLE FOR BEARING ALL COSTS OF REMOVAL OF ANY ARISINGS TO A DESIGNATED WASTE TRANSFER FACILITY FOR THE LIFETIME OF THE DEVELOPMENT.

SECTION 5 – COMMON LAW OWNERSHIP AND MAINTENANCE RESPONSIBILITITES

Within common law, the ownership and maintenance responsibility for any watercourse, and any structures within, lies with the adjacent landowners, unless proved otherwise in writing. This includes watercourses maintained by the Board.

Where a section of watercourse lies wholly within a land or property boundary, or lies alongside a highway, then the land or property owner is considered wholly responsible for the ownership and maintenance of that section of watercourse and any structures within, unless proved otherwise.

NB: this does not include Environment Agency Main Rivers or systems owned and maintained by a utility or other local or national authority.

DEVELOPERS SHALL INFORM PURCHASERS OF THE PRESENCE OF ANY WATERCOURSES AND THEIR OWNERSHIP AND MAINTENANCE RESPONSIBILITIES WITHIN COMMON LAW.

SECTION 6 - FILLING IN OR CULVERTING WATERCOURSES

The Board's prior written consent is required before ANY watercourse is culverted, filled in, or otherwise obstructed.

Section 23 of the Land Drainage Act 1991 states that no person shall:

(a) erect any mill dam, weir or other like obstruction to the flow of any ordinary watercourse or raise or otherwise alter any such obstruction; or
(b) erect a culvert in an ordinary watercourse, or
(c) alter a culvert in a manner that would be likely to affect the flow of an ordinary watercourse,

without the consent in writing of the drainage board concerned.

[Ordinary watercourses include every river, stream, ditch, drain, cut, dike/dyke, sluice, sewer (other than a public sewer) through which water flows and which does not form part of a main river.]

The Board considers that it is beneficial for watercourses to remain open wherever possible for both drainage and environmental purposes. Culverting or filling destroys wildlife habitats, damages a natural amenity, and interrupts the continuity of the linear habitat of a watercourse. It can also remove functional flood plain storage and therefore increase the risk of flooding.

The Board has a separate policy leaflet regarding the culverting of Board-maintained Watercourses.

SECTION 7 - PROPERTY FLOOR LEVELS

The Board may make recommendations to the Planning Authority in respect of good practice in relation to flood risk and land drainage.

National Planning Policy Framework (NPPF): Technical Guidance states that: *site layout and surface water drainage systems should cope with events that exceed the design capacity of the system so that water can be safely stored or conveyed from the site without adverse impact.*

Sewers for Adoption specifies that: *site rainfall runoff systems should be designed not to flood any part of the site in a 1:30 year (3.3%) event.*

The Board recommends that no property should flood in a 1:100 year (1%) site specific event, therefore flood storage above a 1:30 year event may need to be provided in areas such as roads, parking, open space etc. In addition, the Board may recommend a minimum floor level based on recorded flooding or catchment modelling. Other authorities or insurance companies may require a higher standard of protection or floor level.

SECTION 8 - SITE GROUND LEVELS

The ground level of the site must not be raised above the level of neighbouring land unless it can be shown that it will not:

- Obstruct overland surface water flow from neighbouring land
- Cause surface water to flow overland off the site onto neighbouring land
- Raise the sub-surface water table causing water logging of neighbouring land

In general, if ground levels are raised above surrounding land then interceptor infiltration drains (French Drains) will need to be installed around the site boundary. The future responsibility (including maintenance) of such drains shall lie with the relevant land or property owner.

SECTION 9 - ENVIRONMENT AND BIODIVERSITY

It is the Board's statutory duty, when considering whether to issue consent, to take into account any likely adverse effect on the environment.

The Board is a signatory to the Lincolnshire Biodiversity Action Plan (BAP) and welcomes opportunities to work in partnership with developers to carry out environmental improvements on Board-maintained watercourses.

SECTION 10 – RATING INFORMATION

All land over half an acre within the Board's district is subject to an agricultural drainage rate payable annually to the Board. This rate allows the Board to maintain 850km of arterial drainage systems vested with the Board under the Land Drainage Act 1991. It does NOT include all watercourses within the district.

Drainage rate bills are issued on the 1st April of every year and are payable upon receipt. Further advice is available from the Boards finance department.

March 2022

From: [redacted]
To: Kilnside Energy Park
Subject: Kilnside Energy Park Braceborough and Wilsthorpe Parish Council response to scoping out certain activities
Date: 21 July 2025 16:42:23

Dear Mr Chapman
Thank you for your email directing my earlier email regarding the above to the correct email address, Please see below
With regards to the above application for solar farm development and Kilnside request to scope out certain key screening activities from their upcoming Environmental statement when they submit their application in August 2025. There is ambiguity on the design, on cable routing and on many other issues not least battery energy storage systems which are extremely dangerous and as there are no substations close to where this solar farm is proposed it is likely that they will attempt to try to plug in at the Ryhall substation which is already going to be used (once any sort of agreement is arranged with National Grid) for the Mallard Pass solar farm and will create even more problems for the residents. Should any new substations be built it would create a raft of new applications for solar farms causing major environmental damage, destroying farming and the natural countryside. Nothing should be scoped out of the ES on this application and any geographical areas for survey work and consultation should be extended not limited.
There are too many unknowns with this scheme and and the Planning Inspectorate needs to ensure Kilnside submit a full ES with nothing scoped out.
Kind regards
David Kentish
Chair Braceborough and Wilsthorpe Parish Council

From:	NSIPs
To:	Kilnside Energy Park
Cc:	NSIPs; [redacted]
Subject:	RE: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification
Date:	24 June 2025 16:20:37
Attachments:	image003.png image004.png image005.png

Good afternoon

As this falls outside of Cambridgeshire County Council's administrative boundary, we will not be looking to respond on this occasion. However, please could you keep us informed of the progress of the scheme through the NSIP process.

Please send updates to nsips@cambridgeshire.gov.uk.

Kind regards

Barbara Plumb

Consents Coordinator

Place and Sustainability

Pronouns: [redacted]

Cambridgeshire County Council | Facebook | X

Phone: [redacted]

PO Box 761, ALC2660, Huntingdon, Cambs PE29 9QR

From: Kilnside Energy Park
Sent: 23 June 2025 11:03
To: Planning DC ; NSIPs
Cc: Kilnside Energy Park
Subject: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification

FAO Head of Planning

Dear Sir/Madam,

Please see attached correspondence on the proposed **Kilnside Energy Park.**

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **21 July 2025**. The deadline is a statutory requirement that cannot be extended.

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your Ref EN0110022

Our Ref IPP-281

Wednesday 25 June 2025

By email only:
kilnsideenergypark@planninginspectorate.gov.uk

Dear Gary Chapman,

Proposal: Kilnside Energy Park – Reg 10 Consultation and Reg 11 Notification

Location: Great Casterton, Rutland

Waterway: Grantham Canal

Thank you for your consultation relating to the above scheme.

The Canal & River Trust ("the Trust) is a statutory party[1] for the purposes of s.88(3) of the Planning Act 2008 and the Trust is a statutory undertaker for the purposes of s.127 of this Act. We are the charity who look after and bring to life 2000 miles of canals and rivers.

Having reviewed the location of the project and the relationship of the proposal and its associated infrastructure with our network, we do not believe that the proposals as shown would cross land owned or operated by the Trust or impact our interests. Our closest waterway is the Grantham Canal approximately 10 kilometres northwest of the northern cable route search area. We therefore have no comments to make on the proposal.

Should the scheme be significantly amended to potentially affect the Grantham Canal we would welcome further consultation on the proposals, so that we can advise about any potential impact for our interests.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Hazel Smith MRTPI
Area Planner – Midlands

[redacted]@canalrivertrust.org.uk
[redacted]
https://canalrivertrust.org.uk/specialist-teams/planning-and-design

[1] Reg 3 & Schedule 1, Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 (SI 2015/4620

From:	Clerk to Carlby Parish Council
To:	Kilnside Energy Park
Subject:	Fwd: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification
Date:	14 July 2025 12:16:22
Attachments:	image003.png image008.jpg image002.png image006.png Kilnside Energy Park - Letter to stat cons Scoping & Reg 11 Notification....pdf

Carlby Parish Council have concerns and concur with the issues raised collectively with neighbour parishes as set out below.

Cumulative impact on landscape character of Mallard Pass and Kilnside with all the associated infrastructure – solar PV, inverter stations, sub stations, battery storage compounds (see below map)

- Cumulative recreational amenity impact (see below map)

- 2 more substations on our doorstep AND consequently more solar farms will follow!

- Battery storage (BESS) – dangerous and a blight on the landscape. There could be hundreds of shipping containers 4.5m high; c1 MW = 1 container

- Cable routings – if the substation is at the same location as the current Ryhall one, then there is all the cable routing disruption and destruction to consider.

Essential information about the scheme is not available in respect of substations, BESS, cabling route which means that nothing should be scoped out of the ES at this stage and any geographical areas for survey work and consultation should be extended not limited. There are too many unknowns with this scheme and the Planning Inspectorate needs to ensure Kilnside submit a 'full fat' ES with minmal 'scoping out' allowed..

Explanation:

Cumulative impact. Where Mallard Pass finishes on Holywell Road next to Newell Wood, Kilnside begins. It stretches from Great Casterton to Pickworth, up to Woolfox and across near to Exton Park. Whilst there are numerous solar NSIPs in Lincolnshire I am not aware of any that actually join up. This will completely destroy and industrialise the landscape in the wider local area. For the community there will be no respite from the impacts on their recreational amenity, there will be no place devoid of solar panels and associated infrastructure where they can walk, ride, cycle or just enjoy the beautiful countryside in that particular area.

Inline image

Grid connections: There are 2 substations required to process the energy generated from any solar farm.

1. National Grid (NG) substation at 400kV

AND

2. On-site substation for the each solar farm at 400/33kV.

How will it work for Mallard Pass?

1. The NG 400kV substation is already at Ryhall and Mallard Pass is using up all the remaining capacity there.

2. Mallard Pass are building their own on-site 400/33kV substation directly opposite the NG one at Ryhall.

How might it work for Kilnside?

1. There is no available capacity at any NG 400kV substation currently. There are *2 likely options*:

   Option 1:The key is having a substation directly next to a 400kV pylon route so it can easily connect. They seem likely to build a new one along the pylon route adjacent to Essendine Road/Uffington Lane OR extend onto the current 400kV Ryhall one. This is what is implied in the Grid Connection agreement on the TEC register (see later).

   Option 2: There is a new NG substation proposed to be built at Corby Glen as part of The Great Grid Upgrade which entails a 60km pylon route from Weston Marsh to East Leicestershire. According to NG at their consultation Kilnside is not on their radar, the predominant reason for this upgrade is to manage the off-shore wind energy generated along the east coast and bring it across to the Midlands. Any cabling route to Corby Glen from Kilnside site would be further away than Ryhall, so the developer would choose the cheapest option also resulting in the least amount of transmission losses, hence why option 1 is more likely.

2. The developer on-site substation (400/33kV) is likely to be located close to the 400kV NG one, when questioned Kilnside agreed with that in their webinar.

So that is 2 substations potentially in very close proximity to the Ryhall one.

Timing discrepancies for Kilnside

- NG has made a connection agreement with Kilnside (currently near current Ryhall substation) as per the **TEC register,** but this is for a connection on **31/10/2034**.

- Alternatively if Corby Glen is the chosen NG substation, that also won't go live until **2033.** NG are already massively behind on all their upgrades and new substations and timelines will extend.

Kilnside's planned go-live is **2031**. When challenged they said they were pushing for earlier connection with NG. I imagine they are looking for DCO consent before there is a general election AND they want to avoid the government's new Connections Reforms which will prioritise 'ready-to-go' clean power projects and kick out so-called 'zombie projects'. Is Kilnside a 'zombie project', should these timing disconnects and the ambiguity that comes with their current Scoping Request be challenged? They have no clear plan for key infrastructure of substations, BESS and cabling.

Battery Energy Storage System (BESS) for Kilnside. The current Ryhall substation does not have the ability to import and export energy, a key factor for flexibility and commercial viability, which is why Mallard Pass cannot currently offer battery storage. However any new NG 400kV substation for Kilnside would have that capability, hence why it is part of Kilnside's proposal. Mallard Pass may then finally be able to put in a retrospective LPA application for BESS.

Kilnside implied the battery storage would be close to their onsite substation which in turn would be close to any new NG 400kV substation – so potentially 3 major pieces of infrastructure close to the 2 substations Mallard Pass requires! The storage containers are 4.5m in height and there could be hundreds of them!

The risks of BESS to the environment and human health, if it becomes unstable, is horrendous by way of fire, explosion and lethal toxic gas. Lithium Ion batteries are notoriously unstable, at scale it is terrifying how dangerous and environmentally damaging they can be. There is evidence all over the world of the effects of BESS fires and explosions, I won't give the evidence today but can do so if required. As BESS on a 'utility scale' is a new concept in the UK, the government is playing catch up on safety regulations, they are a long way off from providing a satisfactory regulatory framework so developers exploit all loopholes available. We do not want BESS (lithium ion batteries) anywhere vaguely near any villages or rural residents.

More solar farms other than Kilnside on the horizon

Wherever there is a new 400kV NG substation there are likely to be more solar farms wanting to connect in, whether near the Ryhall one or near the new pylon route with the new NG substation at Corby Glen. Checking the TEC register for grid connection agreements it is not just Kilnside that appears for Ryhall/Casewick:

- Great Casterton Energy Park Ltd, renamed Kilnside Energy Park (solar & BESS) at Ryhall 400kV substation, 400MW connecting 31/10/34; ref PRO-004379

- 548 UK Investment Holdings Ltd. Ryhall Farm (solar & BESS) at Casewick 400kV substation, 200MW connecting 31/10/34; ref PRO-002684

- Greentech Projects Holdings Ltd. Graeme Road (solar & BESS) at Ryhall 400kV substation, 550MW connecting 30/10/38; ref PRO-004375

So if we don't put our efforts in to stop Kilnside which looks likely to impact the existing Mallard Pass site area, there will be/already are more even utility-scale solar farms heading our way.

Size and duration of Kilnside

950Ha compared to 852Ha for Mallard Pass, that excludes land required for cabling routing which will be considerably more extensive than Mallard Pass.

400MW AC vs 240MW AC for Mallard Pass – the comparable baseline is the *grid connection rating* which is measured in AC not DC.

60 years like Mallard Pass

Landowner support

YES, so CPO unlikely to be required other than for key infrastructure i.e. substation and BESS land. There will be an impact on tenant farmers who will lose the land they farm, they don't benefit from the c£1000 per acre the landowner receives. It is voluntary whether the developer compensates them in any way.

Consultation

There was no in-person non-statutory consultation (not a planning requirement although advisable). They just did 2 webinars (now in their resources library) and sent information to residents within 2km. As they don't know about the substations, BESS locations and cable routing yet, they have not sent out anything to residents within 2km of that infrastructure. They will have to do that at the statutory consultation in early 2026.

---------- Forwarded message ---------
From: **Kilnside Energy Park** <kilnsideenergypark@planninginspectorate.gov.uk>
Date: Mon, 23 Jun 2025 at 10:35
Subject: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification
Cc: Kilnside Energy Park <kilnsideenergypark@planninginspectorate.gov.uk>

Please see attached correspondence on the proposed **Kilnside Energy Park.**

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **21 July 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Gary Chapman (CEnv)

EIA and Land Rights Advisor (HEO)

The Planning Inspectorate

T: 0303 444 5051

www.gov.uk/pins

Ensuring fairness, openness and impartiality across all our services

DPC:76616c646f72

From:	clerk@colsterworthanddistpc.co.uk
To:	Kilnside Energy Park
Subject:	Response to EN0110022 - Kilnside Energy Park - EIA Scoping and Consultation and Regulation 11 Notification
Date:	18 July 2025 13:51:24

Hello,

The below response to the above subject is from Colsterworth and District Parish Council:

Colsterworth and District Parish Council suggest that the Planning Inspectorate should consider all the projects being planned and their cumulative effects in South Kesteven and Rutland. This is particularly in relation to the Mallard Pass Solar Farm which is effectively "next door" in Rutland, on the westerly edge stretching for four miles end to end. This application could result in a bank of solar panels potentially removing thousands of acres of agricultural land.

[redacted]

Colsterworth & District Parish Clerk

Tel: [redacted]

Website: https://colsterworth.parish.lincolnshire.gov.uk/

Please note, I have a flexible working arrangement.

My Working Hours are: 19 hrs per week.

From:	clerk@cottesmoreparishcouncil.org.uk
To:	Kilnside Energy Park
Subject:	RE: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification
Date:	20 July 2025 10:08:52
Attachments:	image001.png image002.png

You don't often get email from clerk@cottesmoreparishcouncil.org.uk. Learn why this is important

Good morning
Thank you for your email.
Cottesmore Parish Council welcomes being identified as 'a consultation body' for this national infrastructure proposal in Rutland. Clearly something of this scale will have impacts way beyond its immediate locale. As a Parish Council, we value Rutland and particularly its rural setting and character, something that we feel has been under considerable threat of late. The sheer scale of this development, in close proximity to the national scheme already approved at Mallard Pass, increases our stategic concerns about how Rutland is perceived nationally.
We have been asked to identify what should be needed in the Environmental Statement, to address a proposal that is 465 pages long (plus 25 pages of Appendices). We need to respond in a matter of a few weeks in the heart of the summer. As you will know, as a public body, we are also in political cycles that make meeting such short deadlines difficult. At this stage, realistically we cannot add any comments. However, we welcome the involvement in the process and will seek to engage further as the process unfolds.
Kind regards
Michele Jones
Clerk to Cottesmore Parish Council
Telephone: [redacted]
Please note the Parish Clerk works part time so there may be a delay in replying
-----Original Message-----
From: "Kilnside Energy Park"
Sent: Monday, 23 June, 2025 10:45am
To: "'clerk@cottesmoreparishcouncil.org.uk'"
Cc: "Kilnside Energy Park"
Subject: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification

FAO Parish Clerk: Michele Jones

Dear Ms Jones

Please see attached correspondence on the proposed **Kilnside Energy Park.**

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **21 July 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Gary Chapman (CEnv)
EIA and Land Rights Advisor (HEO)
The Planning Inspectorate
T: 0303 444 5051
www.gov.uk/pins

Ensuring fairness, openness and impartiality across all our services

creating a better place
for people and wildlife

Environment Agency

Gary Chapman- EIA Advisor
Planning Inspectorate
Sent via email:
kilnsideenergypark@planninginspectorate.gov.uk

Our ref: XA/2025/100393/01
Your ref: EN0110022

Date: 18 July 2025

Dear Gary,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Kilnside Energy Park Limited (the Applicant) for an Order granting Development Consent for the Kilnside Energy Park (the proposed development)

Thank you for consulting the Environment Agency (EA) on the Environmental Impact Assessment (EIA) Scoping Opinion for the above Nationally Significant Infrastructure Project (NSIP) received on 23 June 2025.

We have reviewed the submitted documents insofar as they relate to our remit. A full list of documents reviewed is presented in Appendix 1.

We do not agree with the scope of the EIA and would recommend that fish and otters are scoped in to meet the requirements of the EIA regulations. Please see attached Appendix 2 for detailed comments.

Please note this review is on the EIA process only. Other assessments required such as Flood Risk Assessment (FRA), Habit Regulations Assessment (HRA) and Water Framework Directive (WFD) have not been included. We would recommend the Applicant consult us on the scopes of these studies in due course.

Please note this response does not represent our final view in relation to any future Development Consent Order (DCO), or any environmental permit applications made to us. Our final views will be based on all relevant information including applications and guidance available at the time of submission.

If you require any further details, please contact us on the email address below.

Yours sincerely,

Laura Edwards
Planning Specialist – Environment Agency
Email: NIteam@environment-agency.gov.uk

List of Appendices

Appendix 1 – List of Documents Reviewed
Appendix 2 – Detailed comments related to the scope of the EIA
Appendix 3 – General comments for consideration
Appendix 4 – Informatives and Advice to the Applicant

Appendix 1 – List of Documents Reviewed

Kilnside Energy Park EIA Scoping Report Main Text and Appendices (including Appendix A: Figures (under separate cover)), prepared by Ove Arup & Partners Limited, dated June 2025

Appendix 2 – Detailed comments related to the scope of the EIA

Biodiversity

Document Reference(s): Scoping Report, Chapter 9, Table 9-10	
Issue	Otters are proposed to be scoped out for construction and decommissioning and repeat otter surveys are not planned to be carried out following the Preliminary Ecological Appraisal (PEA).
Impact	Three main rivers are present within the draft Order limits, and otters are now known to be present on most, if not all, river catchments in England (6th National Otter Survey, England). Otters are highly transitory species; therefore, an otter could construct a holt prior to, or during construction. This may result in damage or destruction of holts or disturbance during construction, which are offences under the Conservation of Habitats and Species Regulations 2017 (as amended).
Solution	Otters should be scoped in for construction and decommissioning. Otter holt pre-construction checks/ surveys should be conducted prior to construction of each section to determine any changes in presence or distribution of otters.
Additional narrative/ explanation Chartered Institute of Ecology and Environmental Management (CIEEM's) Advice Note 'On the lifespan of ecological reports & surveys' states that species survey data may be out of date around 12-18 months following a survey. Construction is expected to take approx. 24 months (Chapter 2, Section 2.5.1.1), and during this time, there may be changes in the baseline distribution of otters. There is still the risk of the Applicant disturbing any places of rest, should they not perform pre-construction surveys.	

Fisheries

Document Reference: Scoping Report, Chapter 9, Section 9.5.2 and Table 9-5	
Issue	The scope of this report only considers the solar development site and does not include the grid connection corridor.
Impact	The grid connection corridor crosses a number of main watercourses, which contain notable fish populations. The grid connection may have negative impacts on fish through, disturbance and loss of habitat.
Solution	The grid connection corridor must be considered when assessing impact pathways to fish. Baseline fish data should also encompass this area.

	Where baseline data is absent or deemed outdated, targeted fish surveys will be necessary to inform the assessment.
Additional narrative/ explanation Our records show that European eel (*Anguilla anguilla*) and river lamprey (*Lampetra fluviatilis*) are present in watercourses within the proposed grid connection corridor.	

Appendix 3 – General comments for consideration

Flood Risk and Modelling

Document Reference(s): Scoping Report, Chapter 10, Table 10-11, 10-12, 10-13 and Section 10.7.1.3	
Issue	We note that Flood Risk and Drainage are proposed to be scoped out of the EIA and will be covered by a Flood Risk Assessment and outline drainage strategy.
Impact	There could be adverse flood risk impacts through crossing watercourses. Flood risk could be increased if crossings are not appropriately designed.
Solution	We will review the Flood Risk Assessment and outline drainage strategy and note that it may identify impacts which may need to be scoped into the EIA process later on if they cannot be resolved.
Additional narrative/ explanation We acknowledge that the main solar site is located within Flood Zone 1, and that a Flood Risk Assessment will be prepared for the proposed development. However, the cable route areas do include areas of Flood Zones 2 and 3, with potential main river watercourse crossings included. The construction phase and potential drilling of watercourse crossings has the potential to cause disturbance to the bed and banks of watercourses, with potential impacts from vibration resulting in settlement. We welcome that new crossings would be avoided as far as reasonably practical. Please note, we would be against any culverting of Main Rivers and would recommend against culverts for crossings over other Ordinary Watercourses. We would prefer to see clear span bridges, please see Appendix 4 for further advice. Watercourse crossings should also be designed to ensure that there are no impacts on flood flow routes or pathways, which could result in increased flood risk. Flood risk impacts to and because of new access crossings should be assessed quantitatively and demonstrate that flood risk will not be increased. Please see Appendix 4 for further advice on watercourse crossings.	

Document Reference(s): Scoping Report, Chapter 10, Table 10-10	
Issue	There is some surface water flood risk within the solar panel development area which suggests potential ephemeral drainage channels.
Impact	Flood risk to and from the development could be increased if infrastructure is placed in these areas without appropriate mitigation.

Solution	Review the Risk of Flooding from Surface Water (RoFSW) mapping for the main solar panel development area and seek to place sensitive infrastructure outside of the areas where potential drainage channels are present as identified in the RoFSW dataset.
Additional narrative/ explanation Table 10-10, page 151 notes that the proposal is located within an area of low to no chance of surface water flooding. Whilst there are no Main Rivers or Ordinary Watercourses which bisect the main solar panel development site, there are clearly defined surface water drainage pathways in the Risk of Flooding from Surface Water mapping which suggest potential ephemeral drainage channels. Sensitive infrastructure such as any Battery Energy Storage Systems, converter stations and substations should seek to avoid these areas.	

Document Reference(s): Scoping Report Chapter 10. Section 10.7.1.3	
Issue	It is noted that Horizontal Directional Drilling (HDD) would be used for any potential Main River watercourse crossings.
Impact	Proposed crossings have the potential to cause impact to the bed and banks of watercourses through disturbance, vibration, and settlement. We note the use of HDD and would require full details for any proposed crossings.
Solution	We would require further details of these crossings, which may require a Flood Risk Activity Permit (please see Appendix 4 for further details).

Biodiversity and Fisheries

Document Reference(s): Scoping Report, Chapter 2, Section 2.2.6.1 and 2.3.3.2	
Issue	Interconnecting power cables will be required, which will be buried underground using the open-cut trench method within the draft Order limits. Underground cables will also be laid to connect the proposed development to a new National Grid Substation.
Impact	Compounds and trenches associated with cable installation present a risk of entrapment of mammals such as otters.
Solution	Cover-over open trenches to prevent wildlife from falling in and place a ramp to enable wildlife to escape. Securely fence compounds and trenches during construction.

Document Reference(s): Scoping Report, Chapter 2, Section 2.5.2.2	
Issue	Site preparation mentions the possibility of installing culverts during the construction phase, to facilitate access over watercourses.
Impact	Culverts have the potential to fragment habitats and reduce connectivity, making dispersal and commuting for some species difficult. Culverts also

	put an added pressure on otters during periods of high water-levels, as culverts offer little room for conveyance and put otters at risk of mortality when crossing roads.
Solution	Should any access tracks cross watercourses or ditches, we would expect to see open-span bridge design. There may be potential for existing watercourse crossing points to be improved for ecology. For example, removal of a culvert and replacing with an open span bridge. Please see Appendix 4 for further advice.

Document Reference(s): Scoping Report, Chapter 9, Section 2.5.2.2	
Issue	Not all available data sources have been considered to assess baseline ecology; including fish survey data.
Impact	Risk of not conducting a thorough assessment of baseline ecology, thereby potentially missing out on legally pertinent species records such as protected species; fish and Invasive Non Native Species (INNS).
Solution	We recommend that the Environment Agency Ecology and Fish Data explorer: EA Ecology & Fish Data Explorer is used as part of the desk study assessment into the baseline ecology of the scoping boundary (including the grid corridor) as it holds data collected during routine samples by the Environment Agency, including protected, priority/ notable and INNS species. This should be presented within the Preliminary Environmental Information Report and Environmental Statement.

Document Reference(s): Scoping Report, Chapter 9, Section 9.3.1.1	
Issue	The list of Environmental legislation does not include recent (2024) Biodiversity Net Gain (BNG) legislation.
Impact	Risk of not considering new environmental definitions in legislation in respect of BNG, such as ‘irreplaceable habitat’.
Solution	Include the following legislation, policy and guidance: Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, for completeness.

Document Reference(s): Scoping Report, Chapter 9, Section 9.7.2.1	
Issue	Although the report makes reference to INNS, it does not detail how the spread of INNS will be minimised. The list of Management Plans to be submitted does not include an INNS Management Plan or a Biosecurity Plan.
Impact	Lack of biosecurity planning can lead to the accidental spread of INNS which is an offence under the Wildlife and Countryside Act 1981. Without

	an INNS Management Plan, there is also the risk of not appropriately responding to/ managing INNS should they be discovered during construction.
Solution	Submit an INNS management plan alongside the Environment Statement (ES). A pathway specific risk assessment should be considered identifying any pathways for spread during construction, operation and decommissioning. A strict and robust Biosecurity Plan must also be submitted within the ES, or alternatively, biosecurity measures could be incorporated within the INNS management plan.
Additional narrative	Where the presence of INNS has been identified, a specific method statement for the INNS species identified (and the locations within which they are present) could be produced, along with specific measures to be implemented during construction works and/ or vegetation and soil removal to ensure that there is no spread of INNS. Known locations of INNS could be marked on the site and vehicle movements restricted in the vicinity of these locations until the INNS have been appropriately removed or treated.

Water Quality

Document Reference(s): Scoping Report, Chapter 10, Tables 10-11, 10-12 and 10-13	
Issue	We note that drainage is proposed to be scoped out for construction, operation and maintenance, and decommissioning.
Impact	If drainage across the site is not sufficiently considered, then this can increase the risk of deteriorating the water quality of the water environment.
Solution	We will review the outline Drainage Strategy and note that it may identify impacts which may need to be scoped into the EIA process later on if they cannot be resolved.
Additional narrative/ explanation Review of the outline Drainage Strategy would provide us with a better understanding of how Sustainable Drainage Systems and construction of crossing points (bridges/ culverts) are going to be constructed and managed. Surface runoff can provide a pathway for contamination to enter watercourses; understanding how this will be managed effectively is important to assess the risk.	

Document Reference(s): Scoping Report, Chapter 2, Section 2.4.1.2	
Issue	Useful guidance documents are not included in the references.

Impact	If guidance documents are not referred to, useful understanding may be missed.
Solution	Refer to Construction Information and Research Association (CIRIA's) The SuDS Manual (C753) and Guidance on the construction of SuDS (C768).

Document Reference(s): Scoping Report, Chapter 10, Tables 10-11, 10-12 and 10-13	
Issue	Surface water quality is scoped in for construction, operation and maintenance, and decommissioning. However, it should be made clear that the scope includes the scoping in of surface water quality aspects from two currently unnamed activities in the scope: risk of Horizontal Directional Drilling (HDD) contamination and risk from firewater contamination.
Impact	HDD or other trenchless installation methods could impact groundwater or surface water quality if not suitably managed. Frac-outs are not uncommon during HDD and can result in fine sediments being released. Fires affecting BESS and substation compounds can result in hydrogen fluoride, which is a colourless gas, that readily dissolves in water to form hydrofluoric acid.
Solution	Impacts to surface water quality from HDD and firewater should be scoped in during construction, operation and maintenance, and decommissioning phases until it can be demonstrated that these aspects would not cause impacts. The Applicant must take all of the steps that are reasonably practicable to minimise pollution during HDD, or from firewater. HDD crossings should be supported by the development and implementation of a Drilling Fluid Breakout Plan, which we would need to review. This may need to be supported by a Hydrogeological Risk Assessment in sensitive controlled water locations.

Document Reference(s): Scoping Report, Chapter 10, Section 2.2.5.4 and 10.7.1.3	
Issue	Unspecified distance between the location of the Battery Energy Storage System (BESS) and the water receptors. The report details

	that drainage measures for the substation and BESS are still being designed. This will need to be considered further once the location of these is finalised. However, a firewater containment and management plan will be essential.
Impact	In the event of a BESS fire, there is a risk of contaminated firewater negatively impacting the water receptors and this risk is higher if the distance is closer. If there are insufficient controls on firewater containment and management, this could severely impact the water quality of water receptors.
Solution	We recommend that the BESS is situated further than the proposed 10 metre minimum offset from water receptors. Additionally appropriate mitigation would need to be put in place. As the designs and plans are being finalised, we would recommend using best practice guidance on the government website and pollution prevention from CIRIA. The capacity for such systems should be determined by the Applicant in liaison with the fire service (please see Appendix 4 for further advice). We look forward to being able to review an outline BESS Safety Management Plan (oBSMP) which should provide details of firefighting water supply for use in an emergency situation, storage for fire water runoff, arrangements for testing of contaminants in the runoff and how this would then be removed offsite. Details are also likely to be provided in an outline Operational Environmental Management Plan (oOEMP).

Document Reference(s): Scoping Report, Chapter 10	
Issue	No foul water/ water from welfare facilities strategy discussed.
Impact	Any foul waste generated will need to be contained, and then either connected to a sewer, tankered away, or treated and discharged under permit. If not managed correctly it can greatly increase the about of nutrients, and other contamination, in receiving water courses and water bodies.
Solution	A foul water disposal strategy should be provided (please see Appendix 4 for permit information).
Additional narrative/ explanation	

The entire Solar Development Site and Grid Cable Route Search Area is located within the River Welland Nitrate Vulnerable Zone. If sewage will be discharged to public sewer, the Applicant should consult with the local water company to ensure that adequate sewer capacity is available, and no adverse effects will occur because of the connection. If treatment and discharge at the site is required, the Applicant should consider any potential impacts of this discharge and confirm that a water discharge activity permit will be sought. If road transport to an offsite disposal facility is required, then there should be regard for this within the waste management procedures.

Document Reference(s): Scoping Report, Chapter 5	
Issue	No water quality monitoring plan proposed to understanding conditions prior to construction.
Impact	Water quality monitoring can help to assess the baseline of the water environment prior to construction activity. Therefore, the success of any mitigation and drainage strategies if it is continued during and following on from the construction activity.
Solution	We would like to review Water quality monitoring, for example quantity and duration of sampling. Water quality monitoring should reflect locational variation in the site, sampling should be able to represent any seasonal variation and weather variation, where possible.
Additional narrative/ explanation This is particularly relevant where the crossings of watercourses are proposed. For instance, monitoring of measures to prevent sediment washing into the channel before vegetation has stabilised any disturbed riverbanks.	

Water Resources

Document Reference(s): Scoping Report, Chapter 10, Section 10.6.1.3	
Issue	Section 10.6.1.3 states there is no requirement for water abstraction from surface water or groundwater to provide during construction assumed at this stage. However, there is no reasoning specified for this and an alternative water supply is not identified. It is not anticipated that the water demand during operation or construction phases will be significant, however, we have concerns that water supply may be problematic in this location.

	Water supply from Anglian Water may be limited to domestic uses only (see explanatory note below). Additionally the use of tankers to provide water should be factored into HGV numbers on local roads, there is no groundwater availability for abstraction and surface water abstraction will be significantly restricted by high 'hands off flow' conditions.
Impact	There are a number of consumptive uses of water for which a sustainable source of supply has not been identified. In addition to domestic supply to welfare stations assumed to be supplied by the water company, these include (but are not limited to): • Dust suppression • Bentonite clay mix for HDD drilling fluids • Concrete batching • Wheel/machinery wash down • BESS cooling • Fire suppression systems If the water company is unable to provide water for these purposes, then alternative sources of supply need to be explored. If water demands exceed 20m³ per day an abstraction licence would be required and practical implications of licence conditions (which are outlined in the catchment abstraction licensing strategy for the Welland) may need to be problem solved in good time of commencement.
Solution	We recommend a basic water supply strategy is produced at pre-application stage to accompany (or be incorporated within) the Environmental Statement. Anglian Water provides a Water Resources Assessment approach which is suitable. Consumptive demands for water should be evaluated and different sources of supply should be options appraised in order to avoid delays pre commencement and to expedite any future permitting requirements and subsequent determination.
Additional narrative/ explanation The location of this development is in an area of serious water stress as identified in our report Water stressed areas – 2021 classification. Anglian Water Services (AWS), who supply the region of this development, are subject to licence reductions (caps) on its groundwater licences to manage the risk of deterioration of the associated water bodies, according to the principles set out in the Water Environment (Water Framework Directive) (England and Wales)	

Regulations 2017. The company's 2024 water resources management plan (WRMP24) has set out that it will be reliant on seeking to defer some licence reductions until new strategic supplies can be developed. This means that until these new sustainable supplies are available, supplies to existing customers and those to supply new development will be as a result of deferring some licence changes under Regulation 19 of the Water Framework Regulations. AWS has adopted a “Non-Domestic Water Requests Policy” for which it asks of Applicants who require non-domestic water supply to complete Water Resource Assessment to understand water demands, water efficiency measures and to effectively forecast water supply requirements. Therefore, we advise that the Applicant engages in conversation with AWS to ensure that supply can be achieved for the development’s needs.

Groundwater and Contaminated Land

Document & chapter: Scoping Report, Chapter 2, Section 2.2.5.4 and Chapter 10, Section 10.5.1.20. EIA Scoping Report Figures.	
Issue	The report has not identified all the Source Protection Zone (SPZ) locations within the search area or given them sufficient importance.
Impact	Insufficient importance given to SPZs could led to infrastructure being sited in high vulnerability locations.
Solution	Consider all SPZs and controlled water receptors within the search areas and use this information to identify the least sensitive location for the infrastructure to be sited.
Additional dialogue / commentary: There isn’t a figure that shows the locations of the SPZs within the search area. This would have been a useful tool for identifying groundwater sensitivities. Section 10.5.1.20 does not mention the presence of a large area of SPZ1 that is within the southern grid cable search area. The solar development site is partially located above SPZ2. There are also SPZ1 and 2, albeit confined, located at the northern-most extent of the north grid cable route search area. Siting of the higher pollution risk elements of the scheme, e.g. substation, inverters and BESS, should not be on SPZ1 where at all possible, and significant mitigation may be required if avoiding SPZ1 is not possible.	

Document & chapter: Scoping Report, Chapter 10, Table 10-7

Issue	Some of the geological formations have been assigned incorrect aquifer classifications.
Impact	Inadequate assessment of aquifers could lead to insufficient mitigation measures for controlled water protection.
Solution	Ensure aquifer classifications are correct
Additional dialogue / commentary: For example, in parts of the search area the Lower and Upper Lincolnshire Limestone are listed as Secondary B but we considered them mostly to be Principal aquifer. Similarly, the Northampton Sand Formation is typically Secondary A rather than B and the Cornbrash Formation is Secondary A. Please check all classifications are correct.	

Document & chapter: Scoping Report, Chapter 2, Section 2.3.3.2	
Issue	The underground cables will range from 33kV to 400kV. It is not clear from the report whether the heat risks to groundwater from the cables will be assessed as part of the EIA.
Impact	Heat is a pollutant, so discharges that might lead to an input of heat into groundwater are groundwater activities. If the potential impacts are not adequately assessed, impacts on groundwater and users of groundwater could be noted.
Solution	Provide sufficient information to demonstrate that the proposal does not pose enough of a risk to warrant being controlled via a permit. Such information may include: • Understanding of site sensitivity and nearby receptors • Proposed installation depth (i.e. sub water or not) • Understanding of the expected operational temperatures of the cable

Document & chapter: Scoping Report, Chapter 2, Section 2.7.1.1	
Issue	The Applicant indicates that at the decommissioning stage the current option is to leave buried cables in situ.
Impact	Potential for buried cables left in-situ following decommissioning to pose an ongoing pollution risk to Controlled Waters.
Solution	The Applicant should demonstrate if buried cables are to be retained that they would not pose a significant risk to Controlled Waters via degradation and/or damage from future agricultural activities.

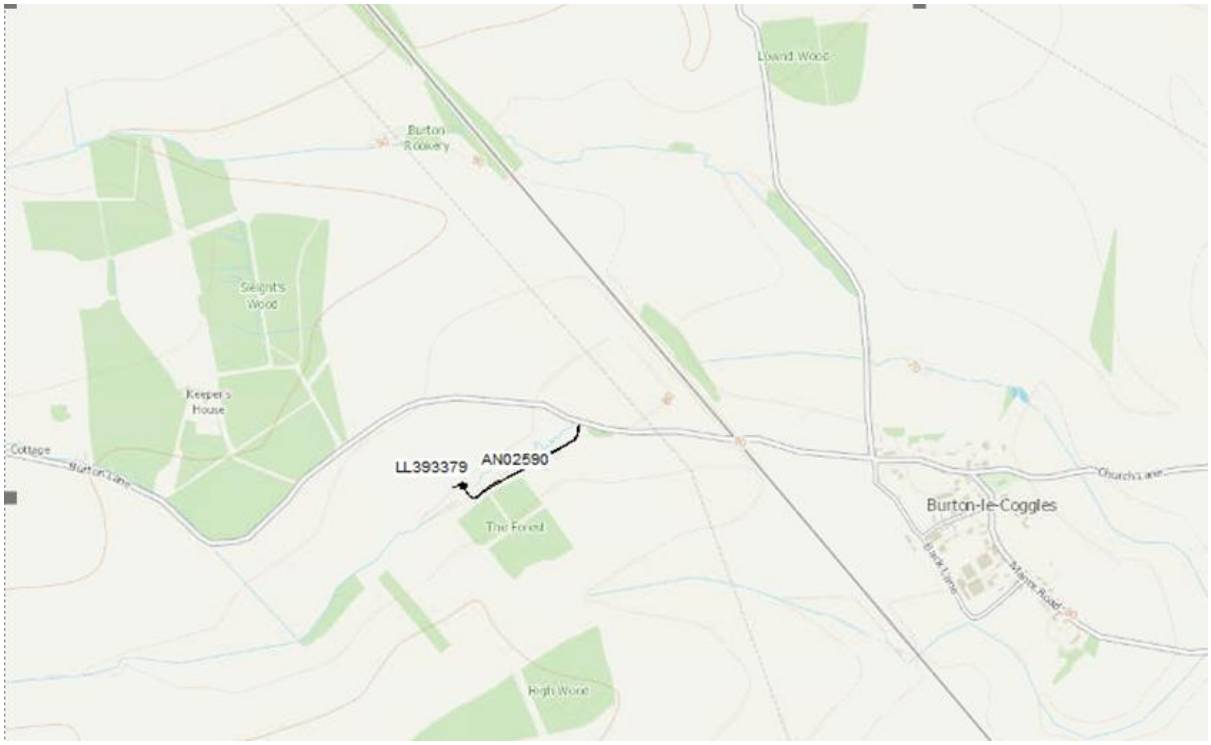
Document & chapter: Scoping Report, Chapter 16, Section 16.4	
Issue	The possibility of encountering unexpected contamination during the construction of the scheme has not been mentioned within the report.
Impact	If a protocol for how to manage unexpected contamination in accordance with Land Contamination Risk Management guidance is not proposed, risks to controlled waters may not be adequately assessed mitigated.
Solution	Ensure that a commitment to managing unexpected contamination is included in the Construction Environment Management Plan.

Document & chapter: Scoping Report, Chapter 16, Section 16.4.2.3	
Issue	No reference has been made the presence of historic landfills within the scheme boundary. There are several along the grid cable search area and solar development area.
Impact	Potential for pollution risk to controlled waters, if risks are not adequately assessed and mitigated.
Solution	Ensure all potential areas of contamination within the scheme boundary are included within the Preliminary Risk Assessment.
Additional dialogue / commentary: Land contamination has been scoped out which is acceptable. A Preliminary Risk Assessment will be produced and form part of the application.	

Environment Agency Owned Land

The Environment Agency holds a leasehold interest for a groundwater borehole/sluice in River West Glen (Swallow Holes) close to Burton-le-Coggles located within the boundary of the cable search area. Please see map below (ref AN02590). The National Grid Reference is SK9658125842.

We would require access throughout the proposed development for measuring groundwater in this location. Depending on if/ how the land is affected, we may require a legal agreement to secure this.



Appendix 4 – Informatives and Advice to the Applicant

Advice to Applicant

Management Plans

We understand that outline versions of management plans are being produced. Those relevant to the water environment and flood risk include: oCEMP; oOEMP; oBSMP; oLEMP; and oDEMP. We support the development of these plans, but until they can be reviewed, we cannot be certain that the risk of deteriorating the water quality of the water environment is being sufficiently managed. These management plans should also include a Drilling Fluid Breakout Plan.

Flood Risk Assessment

We offer the following recommendations to be considered as part of the preparation of the Flood Risk Assessment.

Sequential Test - In accordance with National Planning Policy Framework and the sequential test (paragraph 168), development should apply a sequential, risk-based approach to the location of development, taking into account all sources of flood risk and the current and future impact of climate change, to avoid (where possible) flood risk to people and property. The project should take a sequential approach where it can, if there are any opportunities for development to be located outside of Flood Zones 2 and 3 and into Flood Zone 1, this should be prioritised.

Flood Zones - The future flood extent of the design flood plus climate change which should be informed by the design life of the development. We would also recommend development be setback from watercourses and the design flood extent. This allows for future remediation, replacement, raising of flood assets in the context of a changing climate and increasing flood risk.

Proposed Development Lifetime - The proposed development lifetime, including the construction, operation, and decommissioning phases should be confirmed. Planning Practice Guidance (Paragraph: 006 Reference ID: 7-006-20220825) sets out guidance on this.

Climate Change - If the development is classed as essential infrastructure, then from a fluvial flood risk perspective the higher central climate change allowance should be used (70th percentile). A sensitivity test for the credible maximum scenario, which in this case would be the upper climate change allowance for fluvial flows (95th percentile), should also be completed. Essential infrastructure should remain operational during the design flood scenario.

Flood risk and modelling considerations for watercourse crossings

Any proposed access crossings should be designed so that the soffit level sits above the design flood level. The design flood level for permanent crossings in this case would be the 1% (1 in 100) annual exceedance probability (AEP) plus higher central climate change scenario (fluvial). For temporary crossings as part of the construction phase of the scheme, depending on the period for which these are in place it may be possible to use the present day (without climate change) 1% (1 in 100) AEP scenario although for longer periods of time climate change should be considered.

In terms of determining flood levels, the Mannings equation could be used in the case of open span crossings over small ordinary watercourses. Where culverts are used the methods prescribed within the Construction Industry Research and Information Association (CIRIA) Culvert Screen and outfall manual (C786) may be a useful reference to help determine appropriate sizing although it may be easier to develop simple 1d hydraulic models to understand the impact on water levels and to size crossings appropriately.

Geomorphology considerations for watercourse crossings

To aid in the design of new crossings/ upgrade of existing crossings, including cabling under watercourses, please see the general considerations below. Should it be determined that new access crossings are required, or existing crossings need upgrading, it is strongly encouraged that culverts – especially “closed” box or pipe culverts, be avoided. Open span crossings are preferred, with open portal/ arch culverts being acceptable at most.

The following are general guiding principles to consider when designing watercourse crossings to avoid negatively affecting geomorphology and natural processes: Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with Flood Estimation Handbook (Flood Estimation Handbook (FEH) | UK Centre for Ecology & Hydrology (ceh.ac.uk). Therefore, any infrastructure developments should also take some account of the likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. ‘a flood-rich epoch’) over the remainder of the 21st century (i.e., future proofed designs that are not just based on present-day baseline geomorphological configuration/behaviour).

Cable crossings

- Avoid unnecessary interference with natural processes. Trenchless techniques, such as HDD, are encouraged to minimise the likelihood of cables entering the water environment.
- Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change.
- Ensure cable infrastructure is located outside of areas expected to be impacted by fluvial activity over the duration of the project.
- Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by river movement, becoming an impediment to natural processes.
- Consider opportunities to deliver WFD mitigation measures/ BNG uplift as part of the design.
- Any infrastructural developments on river/floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects.
- Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration or flood defence works (including construction of bypass channels).

Water Framework Directive (WFD)

- Any potential construction, operational, and decommissioning phase impacts that the proposed scheme may have on the river must be subject to a WFD Assessment to the satisfaction of the Environment Agency.

River and access crossings

- If river crossings (bridges/culverts) are required as part of the development, we would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/floodplain environment over the course of the 21st century.

Further guidance in regard to river crossings can be found in the following document: Scottish Environment Protection Agency (SEPA), 2010. Engineering in the water environment: good practice guide River crossings Second edition. SEPA

Notes:

i. WFD applies to all surface waterbodies, not just those designated for monitoring purposes.

ii. Small watercourses and WFD - watercourses with a catchment less than 10km/2 connected to a downstream WFD waterbody take the classification of that waterbody.

iii. BNG guidelines indicate that structures built within 10 m of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric.

[*BNG guidance is mentioned here because our [EA] usual easement for structures, operations, launch pits is to be at least 8m away from the watercourse bank or landward base of fluvial defence structure/embankment (16m if defence structure is for tidal purposes). As stated in the note above, BNG watercourse metric considers anything within 10m of banktop to be encroaching on the watercourse*.]

Watercourse sensitivity

- Care should be taken by Applicants when determining watercourse sensitivity, especially the use of Q95 scores. Rivers with a higher Q95 flow are not more sensitive than rivers with a lower Q95. In the case of water quality, the reverse of this is true, with less dilution meaning a higher sensitivity to change. Some watercourses with low Q95 may also be winterbournes, and therefore cannot accommodate change easily, as they would be dry for most of the year.
- WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. Therefore, watercourses with a WFD designation are no more sensitive than those which have not been designated.

Sensitivity to change cannot be determined from a desk study alone. When determining the sensitivity of a watercourse, the Applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.

Informative 1: Movement of waste off-site – Duty of Care & Carriers, Brokers and Dealers Regulations

The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes.
The code of practice applies to you if you produce, carry, keep, dispose of, treat, import or have control of waste in England or Wales.

The law requires anyone dealing with waste to keep it safe and make sure it's dealt with responsibly and only given to businesses authorised to take it. The code of practice can be found here: https://www.gov.uk/government/publications/waste-duty-of-care-code-of-practice/waste-duty-of-care-code-of-practice

If you need to register as a carrier of waste, please follow the instructions here: https://www.gov.uk/register-as-a-waste-carrier-broker-or-dealer-wales

Informative 2: Movement of waste off-site – Duty of Care & Carriers, Brokers and Dealers Regulations Characterisation and classification of waste
In order to meet the Applicant's objectives for the waste hierarchy and obligations under the duty of care, it is important that waste is properly classified. Some waste (e.g. wood and wood based products) may be either a hazardous or non-hazardous waste dependent upon whether or not they have had preservative treatments.

Proper classification of the waste both ensures compliance and enables the correct onward handling and treatment to be applied. In the case of treated wood, it may require high temperature incineration in a directive compliant facility. More information on this can be found here: https://www.gov.uk/how-to-classify-different-types-of-waste

Informative 3: Solar Panels
We strongly recommend that all solar panels are Per- and polyfluoroalkyl substances (PFAS) free. PFAS are a group of over 10,000 synthetic chemicals widely used in products and industrial processes. PFAS are very resistant to degradation; they are now widely found in the environment, and some types of PFAS have been found to be harmful. Some solar panels are treated with a PFAS coating. PFAS is not mentioned in the Scoping Report.

If panels containing PFAS are used, we suggest that there is consideration of this in the Operational Environmental Management Plan (OEMP) and Decommissioning Environmental Management Plan (DEMP). For example, if PFAS coating is damaged there is a risk of persistent chemicals entering the natural environment during heavy rainfall, washing, maintenance, and removal. The OEMP should also incorporate measures to minimise the risk of panel coatings becoming damaged via 'thermal shock' such as if cleaned whilst at a high temperature due to prolonged exposure to sunlight.

Informative 4: Battery Energy Storage Site (BESS) Design

There is guidance on BESS design and fire protection measures available on the government website:

- Fire prevention plans: environmental permits - GOV.UK
- Health and safety in grid scale electrical energy storage systems (accessible webpage) - GOV.UK
- Pollution prevention for businesses - GOV.UK

The National Fire Chief's Council has published detailed guidance on recommended fire protection measures for BESS sites. We recommend the Applicant refers to this when designing the scheme: Grid Scale Battery Energy Storage System planning – Guidance for FRS (nfcc.org.uk)

We would also recommend referring to CIRIA's Containment systems for the prevention of pollution (C736).

Informative 5: Abstraction Licence

If dewatering is required during construction, it will require an abstraction licence if it doesn't meet the criteria for exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. It may also require a discharge permit if it falls outside of our regulatory position statement for de-watering discharges.

Consumptive abstraction from Groundwater is not available, more details can be found in the Abstraction Licensing Strategy for the catchment. If the dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted.

Informative 6: Flood Risk Activity Permit
The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

• on or within 8 metres of a main river (16 metres if tidal)

• on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)

• involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert

• in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

Culverting existing watercourses/drainage ditches should be avoided. Where culverting for access is unavoidable, Applicants should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period. [paragraph 2.10.87 and 2.10.88 of National Planning Statement for Renewable Energy Infrastructure EN-3]

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03702 422 549.

The Applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Works affecting non-main rivers/ordinary watercourse may require the prior consent of the Lead Local Flood Authority (LLFA) under the Land Drainage Act 1991. As such, we advise consultation with the LLFA in this regard.

Informative 7: Foul Drainage
If foul water is proposed, such as from temporary construction compounds, the Applicant will need to assess requirements and options for disposal and ensure that any permits (where required) are obtained in a timely manner. Guidance on applying for a water discharge activity environmental permit can be found at:
Discharges to surface water and groundwater: environmental permits - GOV.UK

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Kilnside Energy Park Limited (the applicant) for an Order granting Development Consent for the Kilnside Energy Park (the proposed development)

Comments from Essendine Parish Council on the EIA Scoping Report delivered to the Secretary of State in June 2025

1. The Report is lacking in detail to the extent that an in-depth assessment is not possible. For example, The grid substation identified in the connection agreement with the National Grid does not exist. The number and location of substations has not been defined. There are three potential cable routes and The Applicant has stated that they would only "seek to define" the grid connection routes by the time of producing the Environmental Statement. No detail is given with regard to the BESS.

2. It is proposed to use the "Rochdale Envelope" when carrying the assessment of three potential cable routes. This would enable The Applicant to restrict the Assessment to the "worst case." The use of the Envelope is questioned in this case. The three alternatives are not simply three methods that could be used to connect The Development to one defined substation. Each route is a separate case and it is suggested that the Rochdale Envelope could only apply if all three alternatives were different potential methods or routes connecting The Development to a known substation.

3. There are discrepancies in the timeline given by The Applicant. A "go live" date of 2031 has been published. The Applicant has reached a connection agreement with the National Grid but this is for 2034. Even this is likely to be optimistic. The required substation has yet to be built as has any other potential alternatives. It generally accepted that grid connections will take longer than current estimates.

4. The cumulative impact of The Development and Mallard Pass Solar Farm must be assessed. At a common sense level, an examination of a map of the two developments belies any view that the cumulative impact should be scoped out

5. The scoping document does not include the need for an assessment of ethical considerations particularly with regard to ethical procurement, ensuring fair labour practices and responsible sourcing. This is particularly relevant given that nearly all of the infrastructure for The Development would be probably be produced in China. Whilst this aspect is not always considered in an Environmental Impact Assessment, it is suggested that it should be in this case and therefore should be scoped in.

6. The Scoping Report exhibits all of the signs of a highly speculative application and, as such, The Applicant should be prevented using scoping out to circumnavigate the need for detailed scoping both in terms of content and extent.

7. Comments on Table 19.1 Summary of proposed scope of EIA

7.1 Section 6: Climate change resilience.
Given the proposed life of The Development and the possible/probable climate changes that will occur during the 60 year period, this should not be scoped out.

7.2 Section 7: Greenhouse gas emissions
The probability is that most of the components of The Development will be manufactured in China. This will emit a considerable volume of Greenhouse Gases, as will the transportation of the components to the UK. As such Greenhouse Gas emissions should not be scoped out.

7.3 Section 11: Landscape and Visual amenity
The cumulative effect of the proposed Development together with that of Mallard Pass Solar Farm should be scoped in. There would be a sizeable triangle of land involved - Tickencote, Ryhall/Essendine to Pickworth - with two of the three sides occupied by a solar farm. Landscape and visual should be scoped in for The Development itself and for the cumulative impact.

7.4 Section 12: Noise and vibration
The document is unclear on the traffic routes that would be involved in the construction of The Development. It is possible that some residential properties in, say, Pickworth and Great Casterton will be impacted by noise and vibration and this should not be scoped out.

7.5 Section 13: Socio economics
Use of Public Rights of Way promoted recreational routes.
This is scoped out for the operational period. The impact will not only occur during construction but will continue for the life of The Development, albeit potentially changed by mitigating measures. The impact during the operational period should be scoped in.

7.6. Section 13: Effect on Accommodation
Up to 350 people will be employed on the site. This number must have an effect on accommodation within the area and should be scoped in.

7.7 Section 15: Agriculture and soils.
Whilst, as the report states, the removal of agricultural land is a consequence of construction its impact will last over the entire 60 years of operation. Assessment of the impact of The Development during the operational period should be scoped in. Due regard should be given to the effect of climate change on crop production, as a result of continuing global carbon emissions.

7.8.Section 15: The potential effect on the businesses of tenant farmers should be scoped in

7.9 Section 16: Vehicle emissions.
The report states that emissions are <u>expected</u> to be below the threshold, and not that they <u>will</u> be. As such emissions should be scoped in.

7.10 Section 16: Human Health.

The area that would be occupied by The Development is substantial. It is used for recreation and is a contributor to the well-being of residents and people from the surrounding area. This must be scoped in together with an assessment of the cumulative impact of The Development with Mallard Pass Solar Farm.

7.11 Section 16: Major accidents or disasters

The A1 would bisect The Development. That together with the presence of RAF bases in the area gives rise to the possibility of a major accident or disaster. The inclusion of a BESS makes the consideration of accidents or disasters even more important. It should not be scoped out.

7.12 Section16: Material and waste

It is probable that much of the infrastructure of The Development will be manufactured in China. How The Applicant intends to ensure that the Chinese manufacturers will take panels back at the end of their life should be scoped in.

From: clerk@exton.org
To: Kilnside Energy Park
Subject: Exton & Horn Parish Council comments
Date: 21 July 2025 17:30:30

Dear Sirs,
At a meeting of Exton & Horn Parish Council on 2nd July 2025 the following comments in response to the Environmental and scoping process:
It was agreed that the proximity of the proposed development to the protected Exton Park and ‘old’ village of Horn should be considered and require the completion of full ecological and environmental assessments. The location may also encompass the site of the Battle of Empingham (Losecoat Field) and should therefore also require a full archaeological assessment.

Helen Duckering
Parish Clerk
Exton & Horn Parish Council
clerk@exton.org

From: [redacted]
To: Kilnside Energy Park
Subject: Kilnside Energy Park EIA Scoping Consultation - EN0110022
Date: 16 July 2025 18:31:27
Attachments: image001.jpg

Thank you for consulting the Forestry Commission on this proposal.
As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.

While there are no ancient woodlands within the solar development site, although there are several immediately adjacent to it, three within the grid connection corridor and several others adjacent to the grid connection corridor. It is noted that veteran trees have also been identified within the site.

Potential impacts and relevant policy

Ancient Woodland and Ancient/Veteran Trees:

Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed.

Section 5.4.32 of EN-1 – The Overarching National Policy Statement for Energy states:

"*Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both the construction and operational phases"*

We would particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and "Keepers of Time" – Ancient and Native Woodland and Trees Policy in England.

The Standing Advice states that proposals should have a buffer zone of **at least** 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that can result from a significant increase in traffic or dust from construction.

For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be **at least** 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a **minimum root protection area**.

Where possible, buffer zones should contribute to wider ecological networks and be part of the green infrastructure of the area. They should consist of semi-natural habitats such as including woodland, scrub, heathland and wetland.

There is a need to consider both the direct and indirect impacts resulting from construction. Direct impacts can include, but are not limited to, damaging or compacting soil, damaging functional habitat connections and changing the woodland ecosystem by removing the woodland edge or thinning trees. Indirect impacts can also include reducing the amount of semi-natural habitats next to ancient woodland, increasing the amount of dust, light, air or soil pollution, changing the landscape character of the area or increasing the risk of damage to property or assets requiring tree management that could cause habitat degradation.

We would expect to see a detailed assessment of any impacts to the ancient woodlands and veteran trees, including details of measures to be taken to reduce and mitigate any effect.

It is essential that fuels, chemicals or water materials such as topsoil, minerals or hardcore are not stored on Ancient woodland soils or under the woodland canopy.

Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage.

The RPA should be avoided and protected, especially in the cases where there is likely to be frequent construction traffic where roots are particularly vulnerable to compaction. Any effect from the incursion into RPA's of veteran trees may not become immediately apparent and will need to be extensively monitored, even after construction.

Priority Habitat:

It is noted there are also several areas of mixed deciduous woodland within the scoping boundary.

Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Section 5.11.27 of EN-1 of the Overarching National Policy Statement for Energy states:

"*Existing trees and woodlands should be retained wherever possible.....The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long term management and maintenance of newly planted trees should be secured"*

Fragmentation is one of the greatest threats to lowland mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic and dust, particularly during the construction phase of a development. Loss of habitat connectivity is a particular concern where the woodland would become isolated in its landscape and surrounded by development on several sides.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities, the Root Protection Zone must be taken into consideration. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy.

Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone as well as dust prevention measures to reduce any potential impact of dust pollution.

A scheme that bisects any woodland will not only result in significant loss of woodland cover, but will also reduce ecological value due to habitat fragmentation, and will have a negative impact on the natural plants and animals ability to respond to the impacts of climate change.

Grant Funded Woodland:

It should be noted that there are two areas within the cable corridor area that show on our map system that they were established or managed with the support of public money in the form of the Farm Woodland Premium Scheme (FWPS). These will need to be assessed to check the

status of the grant.
These grants appear to still be in 'obligation'. The obligation period can last for up to thirty years from the date the first instalment of grant was paid. The landowner is expected to meet all of the Terms and Conditions of the agreement contract. Failure to do so is likely to require the Forestry Commission to seek to recover all of the relevant grant that has been paid to avoid public money being wasted.

Net Deforestation and Tree Planting:

It is expected that there will be thorough assessment of all trees within the project boundary to identify any ancient or veteran trees in line with good arboricultural practice (BS 5837), also to assess any net loss of trees and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.

Hedgerows, individual trees and woodlands within a development site should also be considered in terms of their overall connectivity between woodlands affected by the development.
Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between existing woodland blocks, to link them and ensure maximum gains to increase habitat connectivity, making woodlands more resilient and to benefit biodiversity across the whole site, not solely in specific isolated areas to be used as screening. Ideally we would like to see woodland creation to be carried out in 5ha blocks or that connecting planting with existing woodlands, should create blocks of at least 5ha.
Where woodland loss is unavoidable, we would expect to see significant compensation and the use of buffer zones to enhance the resilience of neighbouring woodlands. These zones should include further tree planting or a mosaic of semi-natural habitats.
With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050, The Forestry Commission is seeking to ensure that tree planting is a consideration in <u>every</u> development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes:
The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases.
Plans should also be in place to ensure the long term management and maintenance of new and existing woodland, perhaps by creation of a UK Forestry Standard compliant management plan, with access also needing to be considered for future management.
Large scale project fencing could also potentially change how deer move throughout the landscape, this may increase the numbers of deer crossing local roads which may increase the number of deer collisions. Herbivore browsing will affect newly planted woodland and if fenced out of a large area, will increase impacts in surrounding woodlands and the wider landscape where hedgerows, ancient woodlands and stewardship schemes may be affected. It is recommended that an assessment is undertaken of the risk to deer populations with an increase in culls prior to project commencement if the site is to be fenced affecting the normal range of the deer in the landscape.

<u>Avoiding impacts and good landscape design</u>

To meet planning policy and Government guidance, we advise that the EIA scoping and future environmental assessments for this project should include the following:

- Robust adherence to the Standing Advice to rule out loss and deterioration of ancient woodland, ancient trees and veteran trees as far as possible. For example, this may include the need for a larger buffer area than the 15m buffer which is a minimum required

and *might* be sufficient for ruling out impacts to roots in many cases with very small scale developments, but a larger buffer would be recommended. The Assessment Guide in the Standing Advice can help the applicant to establish what further assessments may be needed as part of the EIA process to avoid unexpected problems later on in the design process.

- A thorough assessment of all trees within the project boundary to identify any ancient or veteran trees in line with good arboricultural practice (BS 5837), to assess any net loss of trees and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.
- Hedgerows, individual trees and woodlands within a development site should be considered in terms of their overall connectivity between woodlands affected by the development.
- Maintain and where possible improve woodland condition.
- Utilise biodiversity gains as part of avoiding woodland and tree impacts (especially ancient/veteran) which can also maximise biodiversity benefits by embracing irreplaceable and high priority habitats – for example focussing on ecological enhancements/creation of woodland edges.
- Woodland creation and improvements to ecological connectivity. For example, there are potential opportunities to link fragmented woodland habitats across the site, which will increase habitat connectivity, making woodlands more resilient and benefitting biodiversity across the project area.
- Overall increase in the tree canopy cover to contribute to the Government's target to increase tree and canopy cover to 16.5% of land area in England by 2050.
- A UK Forestry Standard compliant woodland management plan, including deer and squirrel control, is created to ensure the long term maintenance of all new and existing woodland within the site.

We hope these comments have been useful to you. If you require any further information, particularly on buffer zones for ancient woodland or veteran trees, or tree planting, please don't hesitate to contact me.
Best wishes

Sandra
Sandra Squire
Local Partnership Advisor
East & East Midlands
Tel: [redacted]
[redacted]@forestrycommission.gov.uk

Subscribe to our newsletter to be the first to hear about the latest information, advice, and news from the Forestry Commission

From: chairman@greatcastertonpc.org.uk
To: Kilnside Energy Park
Cc: clerk Parish [redacted]
Subject: Re: EN0110022 - Kilnside Energy Park - EIA Scoping and Consultation and Regulation 11 Notification
Date: 17 July 2025 10:49:37

Dear Sir / Madam,

Great Casterton Parish Council (GCPC) objects to the Kilnside Energy Park proposal due to its scale and proximity to the recently approved NSIP Mallard Pass Solar Farm. Furthermore GCPC notes the applicants EIA Scoping Report (dated June 2025) and strongly objects to the proposed reduction of scope in the EIA including, but not limited to, the following aspects detailed to be "scoped out" in column three of Table 19.1;

- Section 8 Cultural Heritage - To exclude consideration of conservation areas on the basis that cabling will be below ground betrays a lack of understanding for the conservation area and historic monument that the solar farm will border. The Roman history of Great Casterton is mostly below ground and so there most certainly is a "..*pathway for impacts on the setting of designated heritage assets*....."

- Section 8 Cultural Heritage - We object to the proposed exclusion of Historic Landscape Character during the construction phase

- Section 15 Agriculture and Soils - We don't believe that it is acceptable to say the loss of agricultural land in the operational phase of the project only occurs as a consequence of construction. We don't believe that once in operation the land could be guaranteed to be used for agricultural purposes i.e. sheep grazing. That valuable land producing land is lost for the duration of the project and maybe never recovered.

- Section 14 Transport and Access - Exclusion of the consideration of hazardous loads during the construction phase is based upon an expectation that these loads will not exist. We object to this exclusion.

- Section 16 Other Env Topics (Health) - To exclude the impact of construction traffic upon human health prior to any definition or agreement on routes is shortsighted and we object to this exclusion. Proximity to A roads alone does not enable access to all areas of the proposed development.

- Section 16 Other Env Topics (Health) - It is proposed to exclude the impact of

reduced access to green space during all three phases (construction, operation and decommissioning). To seek exclusion of this consideration at this stage is staggering and GCPC objects. The instant that land is fenced for construction our community would be prevented from accessing public rights of way and permissive paths.

Yours sincerely,

Alasdair Ryder
Chair, Great Casterton Parish Council

From: [redacted]
To: Kilnside Energy Park; Greatford PC Clerk; [redacted]
Subject: Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification Greatford Parish Council Response
Date: 18 July 2025 22:03:09

> You don't often get email from [redacted]@gmail.com. Learn why this is important

Greatford Parish Council have the following comments to make regarding the request for a scoping opinion by Kilnside Energy Park.

Section 6 Climate change resilience:

Climate change resilience should be scoped into the construction, operational and decommissioning phases of the development as extremes of heat, wind, and rainfall have been increasing significantly over even the most recent years, given that this development (if approved) is not likely to be operational for at least a decade given the likely timing for connection to the National Grid it is foolhardy to expect the climate not to change dramatically during the construction phase. This should be scoped in.

Section 10 Water environment & flood risk

Flood risk should not be scoped out as this development, and that of the adjacent Mallard Pass solar development, both lie within the West Glen river catchment basin, and it is this water course that has caused severe flooding in the village of Greatford numerous times over recent years with extreme problems being experienced in 2024 when 39 homes were flooded, and again in 2025 when 7 of these 39 homes were flooded again.
Greatford Parish Council is very concerned that the cumulative effect of water run off from the panels on this site, combined with the run off from the panels on the adjacent Mallard Pass solar development will place large volumes of water very quickly into the West Glen drainage system causing rapid rises in river levels lower down the catchment, and thus flash floods in the village of Greatford, especially during periods of prolonged wet weather when soils are at field capacity.
A stand alone FRA would not cover the cumulative effects of this site and the Mallard Pass solar site, and there is a risk that if flood risk is scoped a stand alone FRA would only cover flooding within the boundary of the Kinside development. Flood risk should be scoped in and a detailed hydrological report produced to calculate the likely volumes of water draining into the West Glen catchment basin.

Section 12 Noise and vibration should be scoped in as the proposed cable route will affect local residents.

Section 13 Socio economics should be scoped in as the development will result in the loss of homes and livelihood for a number of tenant farmers, and a loss of work for their employees and contractors.

Section 15 Agriculture and soils should be scoped in, this development will result in another large area of good quality arable farm land being lost from food production, a detailed survey of the agricultural land classification of the affected areas of soil should be undertaken at a resolution of one sample per hectare as recommended by DEFRA where agricultural land is to be developed.

Major Accidents and disasters should definitely be scoped in as the site is proposed to have battery energy storage (BESS), The installation of large numbers of BESS containers is a significant potential danger to the local population and it would be a major disaster if one

or more of these installations caught fire and / or exploded (as has happened elsewhere). The downwind population (including residents of Greatford could potentially be exposed to toxic fumes from such a disaster and this should definitely be scoped in.

Kind regards,

Philip Britton
Chair Greatford Parish Council.

Health and Safety Executive

CEMHD Policy - Land Use Planning,
NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

Email: kilnsideenergypark@planninginspectorate.gov.uk

Dear Mr Gary Chapman

Date: 14 July 2025

PROPOSED Kilnside Energy Park (the project)
PROPOSAL BY Kilnside Energy Park Limited (the applicant)
INFRASTRUCTURE PLANNING (ENVIROMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) REGULATIONS 10 and 11

Thank you for your letter of 23 June 2025 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed DCO boundary for this Nationally Significant Infrastructure Project is not within the consultation zone of any major accident hazard sites and is within the consultation zones of several major accident hazard pipelines. This is based on the redline (made up of "Solar Development Site" and "Grid Cable Route Search Area") shown in drawing 'KEP-SR01-00001' (downloaded from https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110022-000003-EN0110022_EIA_Scoping_Report_Kilnside_Energy_Park_Part_2_Appendix_A_Figures.pdf) and verified by the GIS files (filename "KilnsideDCOSiteBoundary.zip") sent to HSE on 7th July 2025.

The major accident hazard pipelines operated by Cadent Gas Ltd are:

- North Witham / Pinchbeck; HSE ref. number 6926, Transco ref.: 1200;
- Westfield / Newstead; HSE ref. number 6951, Transco ref.: 1223.

The major accident hazard pipelines operated by National Gas Ltd are:

- 9 Feeder A16(T) Road / Peterborough Comp; HSE ref. number 7461, Transco ref.: 1719;
- 9 Feeder Hatton / A16 (T) Road; HSE ref. number 6906, Transco ref.: 1181;
- 22 Feeder A16(T) Road / Peterborough Comp; HSE ref. number 7460, Transco ref.: 1718;
- 22 Feeder Silk Willoughby / A16 (T) Road; HSE ref. number 6907, Transco ref.: 1182.

The Applicant should contact the above operators to verify the above and to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. There are three particular reasons for this:

i) The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
ii) The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.
iii) To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice [HSE: Land use planning - HSE's land use planning methodology] is dependent on the location of areas where people may be present within HSE's land-use planning zones. Based on the information in the EIA Scoping Report June 2025, the 'EIA', there appears to be no populations within any consultation zones and HSE would not advise against the current proposal. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

Would Hazardous Substance Consent be needed?

Based on the EIA scoping report, it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no relevant hazardous substances.

Hazard classification is relevant to the potential for accidents. For example, hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an 'addition rule' in Part 4 of Schedule 1 for below-threshold substances. If hazardous substances planning consent is required, please consult the relevant Hazardous Substance Authority (usually the Local Planning Authority) on the application.

Consideration of Risk Assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in Advice Note 11 'working with public bodies in the infrastructure planning process' Annex G on the Planning Inspectorate's website Nationally Significant Infrastructure Projects - Advice on working with public bodies in the infrastructure planning process, Annex G: The Health and Safety Executive - GOV.UK (www.gov.uk). This document includes the consideration of risk assessments under the heading "Risk assessments".

In Appendix D.1 (page 458) of the 'EIA Scoping Report June 2025, Section D.1.1 provides a list of possible major accidents and disasters. In the EIA Scoping Report June 2025, it was not clear if there was consideration of risk assessments arising from the development's vulnerability to major accidents. We would advise this is considered further in line with Advice Note 11 Annex on the Planning Inspectorate's website - Annex G – The Health and Safety Executive taking account of the following: ***"it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses".*** Note, that there are no requirements for any risk assessments submitted to and approved by the relevant planning authority to also be considered by HSE.

Explosives sites

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk . We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

Pp Shirley Rance

Cathy Williams
CEMHD4 NSIP Consultation Team

Historic England

Direct Dial: 07468 701417

Our Ref: PL00798984

The Planning Inspectorate
Temple Quay House
Bristol
BS1 6PN

21 July 2025

Dear Sir or Madam,

HISTORIC ENGLAND ADVICE
Your Ref: EN0110022
Our Ref: PL00798984

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) - Regulations 10 and 11

Application Kilnside Energy Park Ltd (the Applicant) for an Order granting Development Consent for Kilnside Energy Park (the Proposed Development) Scoping Consultation

Thank you for contacting us on 23rd June 2025 regarding a Scoping Opinion in relation to the above Proposed Development. We note the Proposed Development includes the construction and installation of solar photovoltaic panels, Battery Energy Storage Systems (BESS) and associated grid connection infrastructure which would allow for the generation of an anticipated 400 megawatts (MW) of electricity. We understand at the present time there are three Grid Cable Route Search Area options being taken forward.

Historic England Advice

Having reviewed the Kilnside Energy Park EIA Scoping Report, we note the principle infrastructure, as set out in paragraph 2.2.2.1, has the potential to have direct and indirect impacts on heritage assets. These would include built heritage and buried archaeology of both designated and undesignated status. As such, we wish to make

the following comments.

Approach to Assessment

We note that paragraph 8.8.1.4 states that, “a full DBA, geophysical survey of areas where solar PV modules and associated infrastructure are proposed… will be undertaken to identify, confirm, and assess the potential direct impacts to known and potential archaeological remains and to confirm/assess the potential indirect impacts to designated and non-designated heritage assets from the Proposed Development.”

The use of multiple datasets is crucial to an effective process of heritage assessment and management of potential impacts. Portable Antiquity Scheme (PAS) data, geophysical survey, deposit modelling, aerial photo data, lidar, cartographic and documentary sources, fieldwalking, and targeted trial trenching should all be included - building an integrated picture of archaeological potential and sensitivity.

Additionally, it is essential this Desk-Based Assessment (DBA) includes a comprehensive analysis of the site's geology, undertaken by a suitably qualified and experienced geoarchaeologist. This geoarchaeological desk-based work should be completed **prior** to the design and implementation of any geophysical survey. Its findings must directly inform the selection and development of the geophysical survey methodology.

Failure to conduct this geoarchaeological assessment in advance risks the selection of inappropriate geophysical techniques. Without a clear understanding of the underlying geology, there is a significant chance that the chosen method will be ineffective in identifying buried archaeological remains that could be affected by the proposed development.

This recommended approach aligns with current sector good practice, as outlined in the following guidance:

- Geoarchaeology: Using Earth Sciences to Understand the Archaeological Record: <https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeological-record/>
- Deposit Modelling and Archaeology: Guidance for Mapping Buried Deposits: <https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/>
- EAC Guidelines for the Use of Geophysics in Archaeology: Questions to Ask

and Points to Consider: <https://doi.org/10.5281/zenodo.10671298>

As general advice the earlier and more thorough site investigations that are made, the greater the ability of energy projects to deploy their relatively high degree of elasticity in design such that impacts can be avoided, minimised or effectively mitigated. Where intrusive investigations focus on only the most inflexible scheme elements prior to DCO, further targeted assessment post-consent will be needed. Provided the non-intrusive work is robust and the requirements are sound, this is not in itself problematic, if understandings of archaeological significance can still be reflected in design in a proportionate manner to importance and sensitivity.

Additionally, we note from paragraph 8.5.1.1 that the National Heritage List for England data was accessed in February 2024 for this assessment. It is important to ensure that up-to-date data is used in the Environmental Statement to ensure the best possible assessment of potential impacts.

Proposed study areas

The proposed 1km and 2km assessment radii, for the Grid Cable Route Search Areas and Solar Development site respectively, are useful starting points. However, we recommend that a flexible approach is taken regarding this, and professional judgment should still be applied to include particularly sensitive/important assets beyond the fixed radius.

For instance, the Castle Bytham Conservation Area (including the scheduled earthwork castle and Grade I listed Church of St James) is located approximately 3.5km north of the proposed solar development site and the Stretton Conservation Area (including the Grade II* listed Church of St Nicholas) is located approximately 3.5km to the west. We recommend both are scoped into assessment, along with the heritage assets within. Kinetic as well as fixed point views should be considered in line with the methods set out in out in our GPA 3 Setting of Heritage Assets. Furthermore, long views from designed landscapes should be considered, including designed views from the Registered Parks and Gardens identified on the scoping report.

Ermine Street should be approached holistically as a landscape-scale feature, and not as a set of isolated designated and undesignated elements. Careful consideration should be given to areas of the scheme in proximity of Ermine Street, due to the potential presence of Roman and post-Roman remains in the area.

We also note that there is a battlefield within the Solar Development Site, the Battle of Losecoat Field (also known as the Battle of Empingham) (HER ref. MLE5381). This presents the possibility of findspots, which make require consideration for alternative survey techniques - such as metal detecting.

The search radius for the non-designated assets is best commented upon by the local planning authority's archaeological advisors in this instance.

Geophysical Survey and Trial Trenching

We understand that presently there is no geophysical surveys conducted for the Grid Cable Route Area given the uncertainty in the Grid Connection location (paragraph 8.4.3.3). It would be useful for a timeframe for the collection and reporting of this data to be made available to Historic England and the local planning authority archaeologist as greater clarity around narrowed corridors and most likely connection points becomes available.

Regardless of the geophysical survey technique selected, it is essential to ensure that provision is made for the deposition of an appropriate range of geophysical data-not just the processed results-with a trusted digital repository that holds CoreTrustSeal certification. This is particularly important in areas where future geophysical survey work may be restricted or rendered impossible due to construction, post-construction, or decommissioning activities.

The geophysical archiving approach should align with best practice for digital data management in archaeology, as outlined in:

- Toolkit for Managing Digital Data (Dig Digital): <https://www.archaeologists.net/work/toolkits/dig-digital/introduction>

Furthermore, we note from paragraph 8.4.3.4 that no trial trenching is proposed for the Grid Cable Route Area. It would be useful to understand if this refers to works to be conducted prior to the DCO application submission, or at all (as the later would pre-speak the results of non-intrusive assessment).

Earlier prehistoric activity

Within the suite of field-based evaluations, it is important to ensure that provision is made for techniques appropriate to the identification and evaluation of earlier prehistoric activity in areas where the Desk-Based Assessment (DBA) has indicated

potential for such remains.

This is especially relevant where evidence may be present in the form of lithic scatters, assemblages of worked stone typically found within active or former ploughsoil, or in buried soil horizons. Lithic scatters can be of high archaeological value, offering critical insights into earlier prehistoric communities. Their spatial distribution and technological attributes allow us to better understand the behaviour, mobility, and cultural practices of the people who produced them. This is significant because non-stone diagnostic artefacts and cut features from earlier prehistoric periods are often extremely rare (Historic England 2024, p. 3).

Where lithic scatters may be associated with sub-surface features, it is important to explore the relationship between artefacts in the ploughsoil and underlying archaeological deposits.

As highlighted in Historic England's guidance *Managing Lithic Sites* (2024, p. 16), standard evaluation techniques-such as geophysical survey and trial trenching-are generally unsuitable for identifying or accurately assessing lithic scatters. Geophysical survey is unlikely to detect such remains, and the removal of the deposits containing the lithic resource is integral to trial trenching. Inappropriate techniques can result in the underestimation of the resource or even its inadvertent destruction.

Historic England's guidance on lithic scatters can help in the development of appropriate evaluation approaches:

- Managing Lithic Sites: Archaeological guidance for commercial and research projects, planning authorities, land management agencies and developers: <https://historicengland.org.uk/images-books/publications/managing-lithic-sites/>

Mitigation Measures

Subsection 8.7 'Design, Mitigation and Enhancement Measures' sets out possible embedded mitigation measures, the management plans for cultural heritage and archaeology, and options for further mitigation, which will be secured through the draft Development Consent Order. We look forward to seeing the further development of these measures and the securing documents in due course.

Additional Comments

Historic England

Further to the guidance set out in paragraph 8.3.1.3 and included above, we would also take the opportunity to highlight the relevance of our other published specialist guidance:

- Preserving Archaeological Remains: Decision-taking for Sites under Development: <https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>
- Curating the Palaeolithic: <https://historicengland.org.uk/images-books/publications/curating-the-palaeolithic/>
- Commercial Renewable Energy Development and the Historic Environment: Historic England Advice Note 15: <https://historicengland.org.uk/images-books/publications/commercial-renewable-energy-development-historic-environment-advice-note-15/>

We also refer you to the expertise of your local government Archaeological and Heritage Advisors and District Conservation Officers.

Please copy future correspondence to e-midlands@HistoricEngland.org.uk

Yours Sincerely

Pip Naylor
Inspector of Ancient Monuments
E-mail: [redacted]@HistoricEngland.org.uk

From: [redacted]
To: Kilnside Energy Park
Subject: RE: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification
Date: 25 June 2025 16:00:43
Attachments: image003.jpg
image004.png
image005.png

> You don't often get email from [redacted]@islandgp.com. Learn why this is important

Dear Mr Chapman,

Thank you for your email.

We have no comments on this proposal. Given that we appear to have been contacted in connection with Mill Farm, a solar project that IGP developed but no longer own, we do not consider that we are a consultation body as defined in The EIA Regulations.

Best wishes

Tom Calver

Tom Calver | Project communications manager
M: [redacted] | E: [redacted]@islandgp.com | W: www.islandgp.com
Unit 25.7 Coda Studios, 189 Munster Road, London SW6 6AW

From: Kilnside Energy Park
Sent: 23 June 2025 10:57
To: Info
Cc: Kilnside Energy Park
Subject: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification

> You don't often get email from kilnsideenergypark@planninginspectorate.gov.uk. Learn why this is important

FAO Island Green Power RE High Dyke (Mill Farm) solar

Dear Sir / Madam,

Please see attached correspondence on the proposed **Kilnside Energy Park.**

The Applicant for the Proposed Development intends to make an application for

From:	DOCO
To:	Kilnside Energy Park
Subject:	FAO Gary Chapman, REf EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification
Date:	25 June 2025 15:53:39
Attachments:	image001.png image002.png Kilnside Energy Park - Letter to stat cons Scoping & Reg 11 Notification.pdf

Good afternoon,

Thank you for giving Leicestershire Police the opportunity to comment on the Kilnside Energy Park.

I would like to raise concerns in relation to the overall safety and security of developments involving solar farms. UK Solar farms, particularly those in rural or semi-remote locations, are increasingly being targeted by organised crime groups and opportunistic offenders. Common offences include the theft of solar panels, copper cabling, and tools during both construction and operational phases. Given the scale of this proposal, it is essential to incorporate crime prevention measures. I would like the application to clearly outline how the developers intend to mitigate the risk of potential criminal activity.

Failure to address this could result in increased pressure on police resources and potential financial losses for the developers.

If you require any further information, please do not hesitate to contact me.

Kind regards

Megan Wood
8796
DOCO
Leicestershire Police

From: Kilnside Energy Park <kilnsideenergypark@planninginspectorate.gov.uk>
Sent: 23 June 2025 10:52
To: Police Commissioner <OPCC@leics.police.uk>; Police Commissioner <OPCC@leics.police.uk>
Cc: Kilnside Energy Park <kilnsideenergypark@planninginspectorate.gov.uk>
Subject: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification

Dear Sir/Madam,

Please see attached correspondence on the proposed **Kilnside Energy Park.**

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **21 July 2025**. The deadline is

Gary Chapman
The Planning Inspectorate
Environmental Services
Operational Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Amy Charlesworth
Infrastructure Officer
Planning Services
Lincolnshire County Council
County Offices
Newland
Lincoln, LN1 1YL

Tel: [redacted]
E-Mail: nsips@lincolnshire.gov.uk

Sent by E-Mail to:
Kilnsideenergypark@planninginspectorate.gov.uk

Ref: EN0110022

Date: 21 July 2025

Dear Mr Chapman,

Proposal: Scoping Consultation under The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application: Kilnside Energy Park comprising a solar generating station with an expected capacity of up to approximately 400 MW with co-located battery energy storage system (BESS), ancillary infrastructure and an underground cable connection to the national transmission network.

Location: Solar development site located near to Great Casterton within the administrative boundaries of Rutland County Council, electrical grid connection grid options includes land within the administrative boundaries of South Kesteven District Council and Lincolnshire County Council

Thank you for your letter dated 23 June 2025 consulting Lincolnshire County Council (the Council) on the Environmental Impact Assessment (EIA) Scoping Report prepared by Ove ARUP & Partners Limited on behalf of Kilnside Energy Park Limited dated 19 June 2025.

The Council has reviewed the information provided and has the following comments to make in respect of the EIA scoping. Please note the comments are listed in chapter order.

Chapter 2: Site Description and the Proposed Development
Grid Connection Options
The Council notes the grid connection cable route option has not yet been determined as is therefore pleased to see consideration of all route options within the Scoping Report, paragraph 2.2.1.1.

It is noted, under paragraph 2.3.1, that the applicant has an existing grid connection offer to a new 400kV substation referred to as West Anglia connection Node G. The Scoping Report at 2.3.2.3 states that at this point in time, it is not known whether the grid connection offer refers to the proposed WMEL-A substation, part of the proposed Weston Marsh to East Leicestershire Nationally Significant Infrastructure Project (NSIP). The Scoping Report states (paragraph 2.3.2.4) that the applicant continues to engage with NGET on the process for determining the location of the new substation referred to in the grid connection offer. The Council notes the applicant's consideration of the potential for connection at the existing Ryhall Substation should capacity be available or an expansion were feasible (paragraph 2.3.2.6).

Due to the uncertainty surrounding the point of connection (PoC), it's consenting process and projected timescales the Council has concerns regarding the potential prematurity of the scheme. The Council notes the envisaged construction programme, with the earliest anticipated start year for construction being 2029 and the applicant's statement that the final construction timescales would be dependent upon grid connection dates (paragraph 2.5.1.1). However, as the PoC has not yet been finalised and the related substation has not been approved nor constructed, the Council raises concern that potential delays in the grid connection would remove the benefits of the energy park as construction may progress without the certainty of an approved substation. Furthermore, due to the uncertainty of grid connection all current options should be fully scoped and assessed as part of the EIA, until such time that the proposals are refined.

Operational Activities

EN3- para 2.10.10 The British Energy Security Strategy sets out that government is supportive of solar that is "co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use". It is noted that the solar development site falls within the administrative boundaries of RCC, however, it is welcomed that the potential for the Site to be used for sheep grazing is also being explored by the Applicant (paragraph 15.6.2.1). Grazing however needs to be designed into the scheme early, and not as an afterthought. Please note the exploration of agricultural uses for the site should not necessarily be limited to sheep grazing as there are a number of different agri-voltaic options which could be considered.

Decommissioning

The Council would highlight that consideration should also be given to the process and impact of early decommissioning potentially due to instances such as efficiency losses, output, technological advancements or the impacts of adverse weather.

Chapter 3: Legislation, Policy Context and Alternatives

In sections 3.5.5 and 3.6.2 the Scoping Report catalogues the national and local planning policies relevant to the assessment.

The Scoping Report addresses the local planning policy context under section 3.5.5. The Council is pleased to see reference to Lincolnshire County Council's adopted Minerals and Waste Local Plan. It should be noted however, that this document is currently under review, as such the emerging local plan document should be considered. The Council also notes the specific policies referred to at paragraph 3.5.5.9, the Council considers that Policy M12, safeguarding of existing minerals sites and associated minerals infrastructure, should also be referenced.

Alternatives Considered
Schedule 4 (2) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 states that an Environmental Statement (ES) must include a description of its reasonable alternatives (e.g in terms of development design, technology, location, size and scale) considered by the developer which are relevant to the proposed project and its specific characteristics and an indication of the main reasons for selecting the chosen option including an comparison of the environmental effects. Paragraph 3.7.4.2 identifies several areas of the proposed scheme wherein alternatives have been considered for option selection.

In the context of alternatives considered, and in line with EN-3 paragraph 2.10.29, 'the applicant should, where possible utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of BMV agricultural land where possible', the Council would suggest the applicant avoids the use of BMV land where possible.

Chapter 4: Consultation
The Council notes and welcomes the applicant's approach to stakeholder engagement as set out within paragraph 4.1.1.6. The applicant emailed the Council on 09 May 2025 to introduce the project, an introductory meeting is being arranged between the project team and Council officers to introduce the project in greater detail. Lincolnshire County Council will continue proactively engaging with the applicant on the proposals.

Chapter 6: Climate Change Resilience
The Council is pleased to see the study area proposed for the climate change resilience assessment includes the whole site, including the grid cable route corridors. It is noted the Scoping Report at paragraph 6.5.2.4 states the UKCP18 dataset used to establish the future baseline through climate change projections does not include data on certain hazards such as storms, winds and lightening. The Council notes that table 6.2 the applicant considers extreme weather hazards and their likely impacts, this includes increase in storm frequency and intensity. This is welcomed, particularly in light of the recent weather related impact caused by Storm Darragh on the Porth Wen Solar Farm on Anglesey. The cumulative impact, including additional GHG emissions resulting from extreme weather damage also needs to be considered alongside other proposed NSIP-scale solar schemes.

Chapter 7: Greenhouse Gases
The Council notes that the operational stage of the proposals has been scoped in, this is welcomed. In Table 7.4 'Summary of potential operation impact and emission sources', the activity column includes planned refurbishment and routine maintenance, repair and replacement of components. The Council would expect this to take into account the annual failure rate and replacement of panels (including waste and recycling) alone and in combination with other solar schemes.

Chapter 8: Cultural Heritage

Built Heritage and Historic Landscape
Study Area

The Council notes that the current scoping methodology proposes a study area of 2km for designated heritage assets and 1km for non-designated heritage assets (NDHAs), with a discretionary extension up to 5km for high-value assets where potential setting impacts are identified. Whilst the Council recognises the role of professional judgement, ZTV modelling and emerging ZOI data in defining the assessment extent, the Council would expect, as a minimum, the following study areas to be adopted for the solar development site:

- A **3km study area for all designated above-ground heritage assets** (including listed buildings, conservation areas, scheduled monuments and registered parks and gardens), to ensure comprehensive identification of potential setting impacts.
- A **1km study area for non-designated above-ground heritage assets,** including locally listed buildings and other HER-identified assets of built or landscape character.

This approach ensures consistency with previous expectations set out in the Councils formal response to comparable NSIP schemes. A comprehensive schedule of all above-ground heritage assets within 3km of the Order Limits should be included as a technical appendix to the ES. This should identify each asset's designation, location, and distance from the site. Detailed consideration of significance and justification for scoping decisions should be reserved for the accompanying assessment tables. This will enable the Council to make an informed judgement on the assets identified and, where necessary, pursue further clarification or local context.

Grid Connection Corridor – Study Area
For the Grid Cable Route Search Area, the proposed 500m study area for non-designated above-ground assets is acceptable, given the linear and subsurface nature of the works. However, the ES should still assess any potential setting impacts on adjacent heritage assets where relevant.

Historic Landscape Character and Combined Effects
The EIA should include a proportionate assessment of Historic Landscape Character (HLC) within the historic environment chapter. This should consider character areas, historic field systems, routeways, woodland edges, and other features of time-depth, drawing on local and regional HLC datasets (including the Historic Landscape Characterisation Project for Lincolnshire).

HLC is experienced kinetically, particularly along historic routes and settlement approaches and the methodology should reflect this. In addition to cumulative impacts, the assessment should address in-combination and interrelated effects on the wider historic environment.

Assessment of Setting and Methodology
The Council supports the use of Historic England GPA3 and its step-by-step assessment process. The ES should clearly explain how this methodology has been, particularly in relation to:

- Topographic influence
- Visual dominance of the proposed infrastructure
- Functional, historical or associative links between assets and the site

The assessment should articulate how the proposed change may affect the significance of heritage assets through changes to their setting, in line with the National Planning Policy Framework (NPPF) and relevant guidance. While ZTV analysis is useful, it should be supported by consideration of

experiential factors, topography and associative relationships that contribute to heritage value. This analysis should remain clearly distinct from landscape and visual impact assessment.

Presentation and Technical Reporting
Without prejudice to other relevant requirements, the Council would expect the ES to include (as a minimum) the following in relation to the historic environment:

- A tabulated Gazetteer covering all above-ground heritage assets within 3km of the Order Limits. This should identify each asset's designation, location, and distance from the site. It should not include assessment of significance or potential effect.
- A separate assessment table justifying the scoping in or out of each identified asset, based on significance and the potential for impact.
- A standalone setting assessment as a technical appendix to the ES, covering all heritage assets scoped in for detailed assessment. This should include representative viewpoints, and photographic evidence where relevant.
- Integration of HLC findings into the Landscape and Visual Assessment (LVIA), where relevant, particularly where historic landscape features contribute to visual receptors.

At this stage, the Council is broadly content with the high-level approach set out in the Scoping Report, subject to the amendments outlined above—particularly the expansion of the study area and inclusion of a comprehensive schedule of above-ground assets.

The Council encourages early and ongoing dialogue with Lincolnshire County Council's Historic Environment Officers to ensure a smooth assessment process and avoid delays at later stages.

Archaeology
Whilst the Council welcomes the scoping in of the historic environment topic for the Kilnside Energy Park project, the Council is deeply concerned regarding the proposed lack of assessment of the cable route corridors for inclusion within the EIA methodology set out within the EIA Scoping Report Main Text and Appendices [EN0110022]. The assessment should be across the full impact zone, not simply the solar array area. Impacts of equal or greater severity can occur within the cable route.

EN-1 outlines requirements for understanding the significance of heritage assets that will be affected in Paragraphs 5.9.9 – 5.9.15, including paragraph 5.9.12: *'The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents.'*. The proposed omission of survey work along the cable route to identify the presence of archaeology will mean 'the significance of any heritage assets' cannot be adequately understood.

Regarding the requirements for archaeological work to understand the significance of heritage assets which will need to be completed before the DCO submission, the Council would expect the desk based evaluation to be complete and the field evaluation to be well underway by the time the PEIR is produced.

The full standard suite of archaeological evaluation is required. It is vital that a competent full desk-based assessment (DBA) be completed at the earliest opportunity as desk-based work provides the basis for initial understanding. This is informed by and built upon by a full air photo/LiDAR assessment and geophysical survey which in turn assists in the development of the trial trenching programme.

There are a number of methodological flaws within the proposed EIA approach which, if not corrected, will lead to a substandard and not fit for purpose ES.

All assessment work should confirm to the guidance issued by Lincolnshire County Council for archaeological work.

There has been a lack of any consultation regarding the scope of archaeological assessment. This is evident within the search radius for the assessment, with 500m an insufficient distance to effectively understand the archaeological landscape through which the cable route options pass.

Now to address specific aspects of the Scoping Report.

The Council agrees with Paragraph 1.4.2.3 where the Applicant has identified the potential to have significant effects on the environment and that an EIA will be required. The Council would point out that EIA Regulations state that **'***The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors…(d)material assets, cultural heritage and the landscape***.'** (Regulation 5 (2d))**.** This applies to both the solar array area and the cable route options and each should be assessed equally. Archaeological impact may occur in both areas and the cable route has perhaps more spatial and logistical constraints which limit the available mitigation options.

The Council notes that within the Site Description and Proposed Development (chapter 2), section 2.1.3 covers the Grid Cable Route Search Area options that are currently under consideration. It is essential that the methodological approach to assessing these options is effective and comprehensive. Limiting the assessment within the EIA process will mean that far greater risk is pushed back within the DCO process and consequently mitigation measures become more constrained.

The Council welcomes that the Applicant continues to engage with NGET on the process for determining the location of the new substation and that alternatives are being explored, such as the potential for a connection at the existing Ryhall Substation if any capacity were available or an expansion were feasible, as an alternative connection point for the Proposed Development (paragraph 2.3.2.5).

Paragraph 2.3.3.1 confirms that the electricity generated by the Kilnside Energy Park is expected to be exported via underground cabling and that further studies and options appraisals are needed to determine the preferred route. The Council would like to reiterate that the route options should be subject to the same level of assessment that is proposed for the solar array area. This is a requirement under Overarching National Policy Statement for Energy (EN-1), National Policy Statement for Renewable Energy Infrastructure (EN-3), National Policy Statement for Electricity Networks Infrastructure (EN-5) and Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

The Design Principles, as set out within Paragraph 2.4.1.2, should apply equally to both the solar array and export route corridor. The Council would also require inclusion of historic environment features during the careful consideration of cable routing to avoid or minimise impacts on valued landscape features and habitats, when locating construction compounds, when seeking to locate site access tracks, during the development of an environmental masterplan incorporating screening mitigation and filter planting and new planting, SuDs, site drainage and minimising areas of hardstanding required for laydown and construction compounds.

Embedded mitigation suggested for the solar array may not be appropriate for the cable route corridor and this section within paragraph 2.4.1.2 needs to be updated. Avoidance by design is preferred, such as HDD or other trenchless techniques, but this will require adequate understanding of the archaeological remains to enable a fit for purpose mitigation strategy to be created.

Many of the construction activities listed within Section 2.5.2 will have potential to cause harm to buried archaeology. These include, but are not limited to, the following (paragraph 2.5.2.2):

• site preparation:

- import of construction materials, plant and equipment to Site;
- establishment of construction compound(s);
- upgrading of existing site tracks/ access roads and construction of new tracks; and
- upgrade or construction of crossing points (bridges/ culverts) over drainage ditches.

• cable installation to include:

- establishment of mobilisation areas and running tracks;
- temporary construction compounds (to be located on or near cable routes, which are yet to be determined);
- stripping of topsoil in sections;
- trenching in sections;
- appropriate storage and capping of soil;
- appropriate construction drainage with pumping where necessary;
- sectionalised approach of duct installation;
- excavation and installation of jointing pits;
- cable joint installation;
- cable pulling;
- implementation of crossing methodologies for watercourses, infrastructure (including roads and rail), and sensitive habitats (e.g. HDD, cable bridging, etc.);

• site reinstatement, landscaping and habitat creation.

These have potential to harm archaeological remains and therefore appropriate evaluation is required, once locations of ground disturbance have been confirmed. If these details are not available until detailed design has occurred, then a greater focus on the non-intrusive surveys, geophysical survey and aerial assessment, should be undertaken.

The Council is pleased to see a Construction Environmental Management Plan (CEMP) (Section 2.5.6) is proposed. Archaeology should be included within the CEMP and be informed by the previous non-intrusive and intrusive surveys.

Any site reinstatement and habitat creation (Section 2.5.7), including BNG and enhancement, should be included within the archaeological assessment. This includes restoration of soils where compaction has occurred, such as for site compounds and access tracks. Landscaping and a range of habitat creation and ecological mitigation measures such as scrapes, pond and lake creation and soil inversion can detrimentally impact currently surviving archaeology. It is essential that the depths of disturbance and the depth of surviving archaeology across the site is understood, to know where these works would destroy archaeology.

Tree planting can also be very destructive to underlying archaeological remains, the root structures of mature trees can be deep and cover areas several times the size of the tree canopy. The root

structures can destroy surviving archaeological features, change soil chemistry and hydrology, there can be uprooting from storm damage and when a tree dies the roots wither and leave voids which collapse.

Should these be proposed within the route corridor or areas within South Kesteven are selected for ecological offsetting, these need to be included within the impact assessment and Outline Landscape and Ecological Management Plan (oLEMP).

There has been insufficient early consultation despite paragraph 4.1.1.6 stating the Applicant's approach to stakeholder engagement is engaging early to allow stakeholders and the public to shape the Proposed Development's design at a formative stage. Our early advice is that an effective and proportionate approach to the desk-based and non-intrusive survey should be undertaken for inclusion in the PEIR stage, including full geophysical survey and aerial investigation and mapping assessment of the cable route corridor options, as set out in the Lincolnshire Archaeology Handbook requirements.

Section 5.2.2 covers the Applicant's use of the Rochdale Envelope Approach for the proposed development. Where the developer proposes the Rochdale Envelope in dealing with their application, it is essential that an understanding of the archaeological resource is achieved to allow for informed and appropriate mitigation. This can only be achieved through adequate assessment of the full impact zone and the timely provision of the results of both non-intrusive and intrusive surveys to inform the baseline evidence and subsequent informed fit for purpose mitigation strategy. Ideally this should be following selection of the final cable route option and in advance of the determination and certainly the results are needed in advance of the work programme commencing in any of the areas not currently adequately evaluated.

This is in accordance with NSIPs Advice Note Nine paragraph 5.2 which states that ''*Implementation of the Rochdale Envelope assessment approach should only be used where it is necessary and should not be treated as a blanket opportunity to allow for insufficient detail in the assessment. Applicants should make every effort to finalise details applicable to the Proposed Development prior to submission of their DCO application. Indeed, as explained earlier in this Advice Note, it will be in all parties' interests for the Applicant to provide as much information as possible to inform the Pre-application consultation process.'*

The Council recognises that the Applicant will need to maintain a necessary degree of flexibility in the Grid Cable Route Search Area as the application progresses and engagement continues with NGET on the approach to and progress of their siting assessments. Where design elements are known for the cable route, the Council would expect effective assessment to be undertaken within those locations.

Within Section 5.5, the Applicant details potential mitigation, monitoring and enhancement measures. For a scheme this size, the Council would anticipate considerable opportunities to be available for enhancement of the historic environment, in addition to public engagement. The Council would expect an outline Public Archaeology and Community Engagement Strategy (PACES) to be produced in advance of the DCO submission and for the final PACES to be agreed as part of the consent, if granted. Consideration of enhancement of the historic environment is invaluable in balancing the impacts of any development proposal and interest in archaeology, particularly any remains which have been found locally, and, if done well, can have the potential to foster high amounts of positive publicity. It can increase both physical and mental well-being and offset

elements of a development which may be poorly perceived or have a visibly negative impact on surrounding communities and its value has recently been reported on for Lincolnshire.

The Council notes in paragraph 8.2.1.2 that a 500m radius has been chosen for the HER search from the Grid Cable Route Search Area and that the study area has been derived using professional judgement. This is not fit for purpose and early consultation would have informed the Applicant of this. The Council requires a 1km search and this should be rectified at the earliest opportunity.

The list of standards and guidance in paragraph 8.3.1.3 omits the Lincolnshire Archaeology Handbook (2024). This needs to be corrected as this represents an invaluable source of guidance and it lays out the requirements for undertaking archaeological work in the County. The Council would specifically refer you to section 5.16: Guidance for large schemes including NSIPs and EIAs, General Scoping Opinion for the Historic Environment.

The Applicant has proposed undertaking a desk-based assessment that would have 'due regard' to the Chartered Institute for Archaeologists standards and guidance. The Council would expect all works to be undertaken in accordance with the standards and guidance, not simply give 'due regard' to them.

The Council expect the walkover survey to be undertaken of the full cable route options, (Section 8.4.2), on foot.

The Council expect a full desk-based assessment, full geophysical survey and full aerial assessment of the cable route options to be undertaken, to inform option selection. This is both necessary and in accordance with guidance and requirements and any omission of these basic survey methods will lead to a substandard assessment. Regarding desk-based sources, these should include Portable Antiquities Scheme (PAS) data and map regression should include all available maps to provide a reasonable understanding of the development and time depth of the sites.

Once an option has been selected, the Council expect trenching of the preferred route to be undertaken. The approach suggested by the Applicant is both flawed and falls well short of the basic requirement for understanding the archaeological significance of remains within the cable routes. The Council would not expect trenching to be undertaken until a preferred route has emerged.

Historic England Advice Note 17: Planning and Archaeology states that '*Appropriate evaluation can support the smooth and speedy progression of the development and help to manage the developer's risk early in the planning process'* (Section 131). It also states that '*Data gathered can also help to inform a costed mitigation strategy, the benefits of which include a reduction in the chances of unexpected risks and associated costs, and potentially the scope to allocate the cost of archaeology appropriately into financial forecasts'* (Section 132).

The Chartered Institute for Archaeologists Standard and guidance for archaeological advice by historic environment services stipulates that '*Advisors should only make a recommendation in response to a development proposal where the significance of assets affected by the development proposal and the scale of any loss of significance is adequately understood. Where there is insufficient evidence, advisors should recommend that further information be gathered prior to determination of the proposal. Requirements for the gathering of further information should always be focused on informing decision making*.'. Limited survey data can impact the appropriate formulation of an effective mitigation strategy, project timescales and lead to unnecessary and avoidable costs.

Please be advised that most of Lincolnshire is not suitable for trenching over the wet winter months so it is pragmatic to ensure there is sufficient time built into the programme during those seasons where evaluation work, particularly trenching, can be effectively undertaken.

The Council welcomes the Applicant's commitment to confirming magnitude of impact on archaeological assets along the cable route corridor within the ES (paragraph 8.5.2.9). This will require that the geophysical survey, aerial assessment and subsequent trial trenching has been completed.

The Council would point out that in addition to the recorded non-designated heritage assets (paragraph 8.5.2.19), there will be previously unrecorded archaeological sites along the route options and these will need to be assessed and their significance understood, before the final archaeological mitigation plan can be agreed. Pushing back intrusive trenching to a post-consent phase places considerable risk at a late stage in the design process, hinders potential mitigation, especially embedded mitigation, and can prove both costly and impact on construction timeframes.

The decommissioning commitments require greater clarity (Section 8.6.4). The Decommissioning Plan has yet to be developed and will be formulated in accordance with the latest available guidance, legislation and any new technologies at the time of decommissioning, approximately 60 years from the operational commencement of the project unless its lifespan is extended. Given the unknown nature of the Decommissioning Plan and changes to technology at that point, it is anticipated that archaeology cannot be scoped out and should be assessed until such time as the likelihood of any impacts can be determined effectively.

The Council welcomes the embedded mitigation measures set out within paragraph 8.7.1.3 but would point out that there needs to be sufficient understanding of the presence, depth and significance of any archaeological remains to enable the effective implementation and integration of embedded mitigation into the designs. At present, the measures are generic and the Council would need site-specific and targeted measures set out once detailed design has been completed.

In addition to the management plans set out in Section 8.7.2, the Council envisages the need for an Archaeological Management Plan, overseen by an Archaeological Clerk of Works, and a Public Archaeology and Community Engagement Strategy.

The Council does not agree that all impacts on archaeological remains will have occurred during the construction phase and that it can be scoped out of the Outline Decommissioning Environmental Management Plan (oDEMP) (paragraph 8.8.3.1) and operational phase (paragraph) 8.8.2.5 as impacts to archaeological remains can occur from any groundworks undertaken for repair purposes where ground disturbance has not already occurred.. The Council would expect archaeology to feature within any Operation and Maintenance Management Plans.

The oDEMP is yet to be produced and the methodological approach to decommissioning is yet to be determined including whether the cable will be removed or retained and that the exact process will be determined using prevailing methods in 60 years time. The Council therefore advises that archaeology is scoped in for the decommissioning phase and DEMP.

The Council notes that many of the mitigation measures for ecology may have potential to cause harm to archaeological remains. Appropriate consideration will need to be included to protect archaeological remains. These include, but are not restricted to the following actions set out in paragraphs 9.7.2.2 and 9.7.3.4:

- connect and extend existing woodland and hedgerows to strengthen the landscape pattern and habitat connectivity as part of the green infrastructure and nature network;
- achieve early establishment and maximise visual screening through advanced planting;
- enhance existing PRoW and permissive paths;
- enhance existing hedgerow in poor condition and reinforce with planting and management, where appropriate;
- enhance habitats in consultation with landowners in the context of wider environmental net gain;
- hedgerow planting along existing or remnant field boundaries to maximise landscape integration where appropriate; and
- reinforce the existing landscape pattern, including enhancement of field boundaries where appropriate.
- to support BNG appropriate to the landscape, strategically significant habitats (e.g. valuable habitats which are limited or have been lost from the local area) would be restored or created where practicable.

Although not all actions will result in harm, sufficient detail will need to be provided to allow for an understanding of the potential impacts, for example soil inversion for wildflower planting and the depth and extent of ecological mitigation measures such as scrapes, ponds and wetland creation. This is necessary so that the impacts upon any surviving archaeology may be understood and so that proportionate mitigation of the impacts can be agreed with respect to areas of archaeological sensitivity.

Where compensation is proposed (paragraph 9.7.3.2), creating additional habitat to that embedded in the design where it was not previously found, this would need to be included in the assessment of archaeological impacts, depending on the nature of the works.

The Council would point out that there are likely impacts resulting from mitigation proposed within the Water Environment and Flood Risk chapter (Chapter 10).

These include where major watercourse crossings are required for the grid connection cables and associated trenchless techniques and SuDS (paragraph 10.7.1.3). Any works, including HDD, swales, drainage channels, attenuation tanks and landscaping may impact below ground archaeological remains and should be considered within the outline Drainage Strategy (paragraph 10.6.1.1) once the significance of any archaeological remains has been appropriately understood.

Further impacts are potentially likely from the proposed mitigation relating to agriculture and soils (Chapter 15). The embedded measures (paragraph 15.7.1.3) advise seeking to site access tracks, compounds and substations on the lowest quality land available within each parcel and restoring temporarily acquired agricultural land to its former land use and quality. The Council would advise ensuring appropriate field evaluation is undertaken to inform location of access tracks and compounds and require further information on what the land restoration entails for 'temporarily acquired agricultural land'.

Regarding management plans in general, consideration of impacts to archaeology should be included within the other topic-specific management plans. The Council has seen in other NSIP submissions a lack of interoperability in the assessment and understanding of the impacts, for example the heritage or archaeology chapter does not include reference to the impacts of proposed ecological mitigation measures or drainage strategies which would have extensive ground impacts to the archaeological horizon. The Council would therefore strongly encourage an integrated

approach to undertaking assessments informed by an understanding of the range of impacts which would result from the Kilnside Energy Park scheme, and that documents such as the topic-specific management plans inform the assessment chapters including cultural heritage.

Chapter 9: Ecology and Biodiversity

Chapter 9 of the EIA Scoping Report discusses the Applicant's approach to Ecology and Biodiversity and Appendix B is the Applicants' Preliminary Ecological Appraisal undertaken on the Solar Development site. Having reviewed these and other sections of the report relevant to ecology and biodiversity, subject to the comments below, the Council supports the approach to the assessment of ecological impacts.

Study area

The Scoping Report proposes a 10km study area for internationally important statutorily designated sites, 2.5km for nationally important statutorily designated sites and a 2km study area for non-statutory designated sites and protected species records. Appropriate extensions should be made to these distances where statutorily designated sites' features include mobile species such as wintering/breeding birds or bats. Consideration should also be given to hydrological connectivity with designated sites in order to ensure that the proposed study area is appropriate to the project's Zone of Influence.

Current baseline

There are a number of internationally important designated sites within 10km of the proposed development identified in Table 9.3 and Figure 9.1. Natural England should be consulted in relation to the requirement for a Habitats Regulation Assessments for internationally important designated sites.

There are also a series of nationally designated statutory sites (SSSI) and non-statutory designated sites identified within 2.5km and 2km respectively in Table 9.4 and Figures 9.1 and 9.3. The ES will need to assess the potential for impacts on these sites.

Survey data currently only covers the Solar Development site but the Applicant does acknowledge that the Grid Cable Route will also need to be surveyed. Given the relatively early stage of the proposal limited information is presented in the Scoping Report on the habitats and species currently present on site. The Applicant also states in Appendix B that the majority of surveys to date were carried out in autumn and winter which is outside the usual period for ecological surveys. Whilst it may have been possible to undertake habitat classification from those surveys, species data from these surveys should not be relied upon to produce an accurate picture of the site's current ecological interest.

Paragraph 9.2.3.2 states that records have been obtained from Leicestershire and Rutland Environmental Records Centre. The Council advises that records should also be obtained from the Lincolnshire Environmental Records Centre to ensure that data relating to sites and species within Lincolnshire are also obtained for inclusion in the EIA and any impacts properly assessed.

Desk based studies and initial surveys have indicated the likely presence of a range of habitats and species within the study area. Detailed surveys to establish the precise locations of these habitats and presence / absence of species will be required to identify any impacts, to inform mitigation and enhancement opportunities and to undertake a Biodiversity Net Gain (BNG) assessment.

Scope of the assessment

A summary of potential ecological receptors scoped in or out of the assessment is presented in Table 9.10. Subject to the comments below in relation to the scope of ecological surveys and the

expansion of the survey area to include the Grid Cable Route, the Council agrees with the scope of the assessment.

Assessment methodology
6.3 of Appendix B sets out the recommended suite of ecological surveys to be undertaken in the Solar Development site support of the application. The Council considers that the list of surveys is broadly appropriate. A similar suite of surveys will be required for the Grid Cable Route.

Specific comments in relation to the proposed surveys are as follows:

- All ecological surveys should follow industry standard guidance.

- The Council will expect to see a plan identifying where any Tree Preservation Order (TPO), veteran and ancient trees/woodlands are located within the site and showing that consideration has been given to suitable working distances within proximity to trees. The Council advises that ancient woodland data for the county has recently been updated by the Greater Lincolnshire Nature Partnership. The Applicant should ensure that the most up to date information is being used to assess impacts including from field surveys commissioned in support of the application.

  In addition to this, the Ancient Woodland Inventory (AWI) generally omits woodlands smaller than 2ha. Therefore, The Applicant should ensure that all woodlands in the zone of influence have been suitably assessed during field surveys to clarify the presence/absence of potential ancient woodland.

- Botanical surveys should be appropriately timed and targeted to detect the presence of populations of scarce arable flora within the survey area.

- Breeding bird surveys should be designed to ensure that species whose breeding activity may not necessarily be encompassed within the scope of a standard breeding bird survey (e.g. due to the timing of their breeding activity) are accurately recorded. Relevant species will include but may not be limited to barn owl and quail.

- Given the presence of a number of sites important for their populations of both breeding and wintering birds in the wider area, the Council is keen to see that appropriate effort is made to both understand and mitigate potential impacts on these sites and their associated bird populations.

Cumulative Assessment
This development is one of several proposed, large NSIP solar schemes in the area. Therefore, the combined implications for habitat loss, land-use change, and associated impacts on species, particularly for species groups such as farmland birds, will need careful consideration in the assessment.

Habitats Regulations Assessment
If the potential for impacts on statutorily designated sites is identified, the Applicant will need to provide the information reasonably required for a Habitats Regulations Assessment (HRA). The

Planning Inspectorate will need to undertake a HRA and satisfy itself that sufficient information has been submitted by the Applicant to enable this to be completed.

Approach to Biodiversity Net Gain

The Council welcomes the Applicant's intention set out at paragraph 2.2.2.3 to deliver a minimum of 10% BNG. Given the scale and nature of the Proposed Development, the Council expects that the project will be able to deliver significantly in excess of 10% BNG.

A BNG assessment should be undertaken using the Statutory Biodiversity Metric. Proposals for habitat enhancement within the Habitat Management and Monitoring Plan should be realistic and demonstrate meaningful biodiversity gain over and above any mitigation measures proposed. Details and locations of proposed enhancements and associated management should ideally be provided at the Preliminary Environmental Information Report (PEIR) stage. Commitments to deliver BNG will need to be secured in the DCO and the Applicant will need to demonstrate that the commitments made to delivering BNG are achievable.

The Council encourages the Applicant to work with other developers and stakeholders in the area to identify opportunities to deliver BNG strategically including by keeping up to date with emerging local strategies such as the Greater Lincolnshire Local Nature Recovery Strategy.

The Council's Infrastructure Ecologist will be happy to work with the Applicant, their consultants and other stakeholders throughout the EIA process to ensure that ecological elements of the application are properly addressed, and that the scheme secures the maximum potential benefits for biodiversity.

Chapter 10: Water Environment and Flood Risk

The Council notes that the final Water Environment and Flood Risk ES Chapter would be supported by a Water Environment Regulations (WER) Compliance Assessment and a Flood Risk Assessment and Drainage Strategy. Paragraph 2.2.12 of the Scoping Report outlines the Applicant's approach to surface water flood risk. As stated within the Scoping report, further consultation with the Council would be appreciated as the development of proposals and assessments progresses. The Council is satisfied with the proposed approach, and has no further comment to make at this stage.

Chapter 11: Landscape and Visual Amenity

This Review has been carried out by AAH Consultants on behalf of the Council and relates to landscape and visual issues and elements only. It is based upon a review of the relevant sections of the following documents:

- *Kilnside Energy Park; EIA Scoping Report; Main Text and Appendices EN0110022 June 2025; and*
- *Kilnside Energy Park; EIA Scoping Report Figures EN0110022 June 2025.*

Aligned with the applicants EIA Scoping Report, we would expect the production of a Landscape and Visual chapter of the Environmental Statement (**ES**), which would be in the form of a Landscape and Visual Impact Assessment (**LVIA**), and any supporting information (such as plans or figures) reflect current best practice and guidance from, as a minimum, the following sources:

- *'Guidelines for Landscape and Visual Impact Assessment'*, (GLVIA3), April 2013 by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA);
- *'An Approach to Landscape Character Assessment'*, Natural England (2014);
- '*Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals'*, 17th September 2019 by the Landscape Institute (LI);
- *'Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)'*, 10th January 2020 by the Landscape Institute (LI) ; and
- *'Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations'*, May 2021 by the Landscape Institute (LI).

Overall, we would expect that the assessment of potential Landscape and Visual matters and evolving proposals relating to the Kilnside Energy Park, as a NSIP, follow an iterative process of engagement and consultation to ensure the following are not fixed at this stage and are discussed, developed and agreed at subsequent technical meetings:

- Landscape and Visual Impact Assessment (LVIA) Methodology;
- Development, and subsequent ZTV, parameters;
- Study Area extents (distance);
- Viewpoint quantity and locations;
- Photomontage/Accurate Visual Representations (AVRs):
    - Quantity and location;
    - Phase depiction;
    - AVR Type and Level.
- Mitigation Measures/Landscape Scheme/Site Layout;
- Cumulative effects, including surrounding developments to be considered; and
- The extent as to which a Residential Visual Amenity Assessment (**RVAA**) should be considered (based on the Landscape Institute TGN 2/19) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

While the focus of this review is on Landscape and Visual matters, information provided within sections 1 to 5 of the applicant's report have also been considered, providing background and context to the site. At this initial stage of the NSIP process, the content and level of information provided by the developer within *section 11* (Landscape and Visual Amenity) are generally considered satisfactory, however, as stated previously, we would expect to discuss this content and approach as part of the iterative process, and the following should be considered in the evolving assessment and layout:

Viewpoints
There are a number of representative viewpoints identified within paragraph Table 11-16. However the final locations are to be reviewed and agreed with the Council and other relevant stakeholders. The final viewpoint selection should also consider views of taller and more conspicuous elements, such as battery storage or sub-stations once the layout is more developed, the cable route (once refined), any "key views" identified within any relevant Neighbourhood Plans, and from key heritage assets with views of the development.

Photomontages

To gain an understanding of the visibility of the development and how the panels and infrastructure would appear in the surrounding landscape, Photomontages/Accurate Visual Representations (AVRs) should be produced. While paragraph 11.5.1.37 identifies Viewpoints 7, 9, 11, 19, 20, 23, 26, 27, 31, and 39 are proposed to be developed as photomontages, the final number and location of the agreed viewpoints to be developed as Photomontages/AVRs should be agreed with LCC and other relevant stakeholders and produced in accordance with *TGN 06/19 Visual Representation of Development Proposals*. At this stage, it is deemed appropriate that these should be produced to illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual with planting established (10 to 15 years). The Photomontage/AVR Level and Type is to be discussed and agreed.

Methodology
As stated previously, the LVIA should be carried out in accordance with the GLVIA3 and undertaken by suitably qualified personnel. The methodology provided at *Section 11.4* and is on the whole typical of those used for ES Chapters and standalone LVIA's where potential significant effects can be considered and reflects the guidance in GLVIA3. We would request that the most up to date technical guidance be used, and we would welcome the opportunity to discuss the methodology in detail with the applicant at the next stages of the project.

Scope of the Study Area:
It is acknowledged in paragraph 11.2.3.8 that a Study Area (also shown on Figures 11.1 to 11.3) covering 3km from the Solar Development Site; and 500m from the Grid Cable Route Search Area, has been allowed for initially based on desktop and field study, and paragraph 11.2.3.7 indicates that views beyond 3km are unlikely.

While we have the benefit of two initial ZTV's at this stage the designs are evolving and may not accurately represent the full extent of potential visibility of the development, which would be updated once these elements are known and the study area should not be fixed until the full extents of visibility are known (initially through a ZTV but this should more crucially be tested in the field).

Once the study area has been defined, the LVIA should also provide a justification for the full extent/distance, which would be further refined as part of the iterative process.

We do not feel we can provide more detailed feedback at this stage on the Cable Route Corridor until further information is provided, and would expect the LVIA to provide a clear evaluation and likely impacts of any route. The scoping report details cables would be underground, however if there are any sections of overhead cable or other associated above ground equipment or features, this should be clearly identified and considered within the LVIA to understand the extent of this and where any potential viewpoints may be required. We would encourage any overhead cables be avoided or reduced to minimise visual intrusion.

Future baseline
Several renewable and energy infrastructure projects (such as Solar, BESS, Hydrogen, Pylons and cables along with associated infrastructure) are planned in the region, including large scale NSIP DCO schemes as well as TCPA scale projects. These will all combine to change the character of the wider landscape across several National, Regional and Local Character Areas.

The future baseline is described in section 11.5.2 of the applicant's report. We have concerns regarding effects on the county and district landscape character through the development of several large-scale renewable energy projects across Lincolnshire. The mass and scale of these projects combined has the potential to lead to adverse effects on landscape character over an extensive area across multiple published character areas. The landscape character of the local and regional area may be completely altered through an extensive area of land use change, and introduction of energy infrastructure in a region that is predominantly agricultural. This would also be an issue when experienced sequentially for visual receptors travelling through the landscape and experiencing multiple schemes across potentially several kilometres, albeit with gaps between some of the projects. However repeated views and presence of large scale solar and BESS would combine over time to create a greater perception of change.

This change to the landscape character should be considered in any baseline, and also the assessment of cumulative effects.

Landscape
Published landscape character areas have been identified, however to align with GLVIA3 the LVIA should include an assessment of landscape effects at a range of scales and likely need to include a finer grain landscape assessment that includes the Site and immediate area that also considers individual landscape elements or features that make up the character area.

Visual
The visual assessment should take account of the 'worst case scenario' in terms of winter views, and effects associated with landscape mitigation at the Operational Phase (year 1), Residual Phase with planting having established (10 to 15 years), and at the Decommissioning Phase.

The LVIA should ensure all elements associated with the development are considered and assessed, such as battery storage, sub-stations, CCTV poles, and boundary, acoustic or temporary fencing, which may be more visible than panels due to height, mass and extent.

The visual baseline, and subsequently assessment, should be based on visual receptors, with viewpoints utilised to illustrate and represent views from these receptors, and therefore aligned with GLVIA3, and recent clarifications provided in LI TGN-2024-01. The visual assessment should consider movement of receptors along linear routes, such as roads and PROW, so as to fully understand the visual experience, and subsequently clearly identify sequential effects and not just focus on static viewpoints.

While residents of communities are identified in the visual baseline, there is no mention in the scoping report of an assessment of residential visual amenity. Residents within individual properties should be considered as part of any visual assessment, and any identification and subsequent survey of these should be carried out to Landscape Institute 2/19 Residential Visual Amenity Assessment (**RVAA**). RVAA is a step above an LVIA, considering private views from residents, and we expect these receptors be considered as part of any assessment.

Cumulative impacts
Cumulative Landscape and Visual effects should be assessed, particularly in regards to other NSIP solar schemes, but also should consider smaller solar and renewable energy projects.

As identified in the section above on the future baseline: this is a region that is undergoing rapid and extensive change in landscape character through the introduction of extensive areas of energy infrastructure. In the absence of district wide, or county wide character assessments, we recommend the LVIA consider character areas across these areas through reviewing existing character areas and identifying common characteristics across the region that may be cumulatively affected by the schemes. For example, across the region agriculture is typically the predominant land use and landform is typically flat or gently undulating, whether a coastal character area or one inland. Subsequently it is possible to start to use a logical approach to understanding how these multiple schemes will change and affect this wider landscape. We are available to discuss and consult on this aspect of the assessment.

Mitigation and Layout
As this is an iterative process, at this stage it is not relevant to comment on any potential mitigation or layout of the development. However, best practice guidance, relevant published landscape character assessment's and Local and County Council Policy and Guidance shall be referred to and implemented as appropriate. We would also expect the landscape and planting scheme is coordinated with other relevant disciplines, such as ecology, heritage or civils (e.g. SuDS features), to improve the value of the landscape and reflect appropriate local and regional aims and objectives. Any Landscape Scheme and associated Outline Management Plan should accompany the ES.

Chapter 12: Noise and Vibration
The Council will defer to South Kesteven District Council and their Environmental Health team on the scope and methodology for this element of the ES.

Chapter 13: Socio-Economics
The Council notes the inclusion of a temporary workforce to be used during the construction phase of the proposed development. It is noted that the number of employees will be refined through the continued design and ES process, and that the current estimate is for approximately 350 gross construction employees at the peak of the construction phase.

The applicant should be aware of the potential negative socio-economic effects that could arise from a high number of temporary employees:

- Demographic changes and potentially community cohesion, which could be significant depending on workforce age, gender and location of temporary accommodation.
- Impact on local housing markets, including availability and affordability, particularly if the workforce is located within nearby smaller settlements.
- Impact on Tourist Accommodation, as discussed above
- Social services and infrastructure, an obvious area for consideration is healthcare but perhaps education and other services, again, depending on age, gender and location of temporary accommodation.
- Public health and safety, depending on age, gender and location of temporary accommodation, with potential for anti-social behaviour.

The preliminary assessments of socio-economic impacts undertaken so far do not include consideration of cumulative impacts of temporary workforces for other NSIPS, apart from Mallard Pass, in relation to the above points. There is the potential for a very high level of temporary

workers that will need accommodation at a similar time. Consideration should be given to the cumulative impacts of temporary workforces, particularly in regard to other NSIP scale developments that overlap in their temporal scope.

Tourism

There is the potential for indirect impact on tourism in Stamford, and the wider area if there is no spare capacity within local accommodation. Stamford in particular is a tourist destination, and the location for large events such as Burghley Horse Trials. It is therefore imperative that bedspace data is collected and analysed for the wider Stamford and south Lincolnshire, and Rutland areas to ensure that there is capacity to accommodate the temporary workforce, and that there is no conflict with the existing tourist demand.

The Council would therefore recommend that tourism is scoped into the EIA and not scoped out as currently suggested. As already mentioned, bedspace data is not known, and without this it is not possible to say whether or not there will be impacts arising from the proposal.

Community and recreation facilities

The Council disagree with the scoping out of impacts on community and recreational facilities. Albeit not as large as for some other NSIP proposals, the temporary population is likely to have an impact on the local area, especially for the availability of rental properties and on recreation facilities available in the evenings. As with other areas, once more information is known about the number of temporary workers etc this can be reviewed.

Landscape and Visual Amenity

Within this section, and the wider document, there is no mention of Stamford North SUE that sits across the norther edge of Stamford, with proposed development in both authority areas. There is likely to be limited visual link to the proposal, but the southern cable route would be very close to the SUE, and construction of the cable route, if southern route chosen would be visible from existing properties and/or any new properties that may be inhabited.

Transport and Access

Road traffic collisions are identified as a risk in the Council's community risk register as set out at paragraph 16.6.3.7, with greater detail provided in Appendix 4 at ID 4.1- Road Accidents. Consideration should also be given to the socio-economic impacts that occur as a result of road traffic collisions. Road traffic collisions on the A1 have a significant impact on Stamford Town Centre with traffic seeking to divert around collisions.

Cumulative and in combination effects

Altogether, there are 24 NSIPs within the county of Lincolnshire. The high volume of NSIP proposals in Lincolnshire has the potential to affect a significant area of the rural landscape during construction and operational stages. The cumulative impact of successful proposals could significantly change the rural character of the county. The effects of this potentially significant industrialisation of the landscape on the county's perception by visitors and tourists as well as residents and businesses is, currently, not well understood.

The proposed development, if consented, will have a cumulative impact with the Mallard Pass Solar PV development. While, as identified, construction of the two schemes is unlikely to overlap,

the cumulative impact of the two developments during their operational phase will be significant. At their closest, it is stated that there will be just 150m between the two developments, thus they will appear as one. Once operational, the two schemes will span an area from Greetham in the west, to Greatford and Barholm in the east, forming an arc to the north of Stamford, and impacting upon a number of villages both in Rutland and Lincolnshire. This arc will be visible from a wide number of locations across both areas.

Community benefits
The Council notes community benefits are not a material planning consideration and would not form part of any ES. The Council refers to Paragraph 4.1.1.6 of the Scoping Report, which states the intention of *'creating a development project that benefits the local area for the next 60 years*'. The Council would welcome the opportunity to engage with the applicant on how best to achieve this.

Public Rights of Way
Paragraph 13.4.6.3 identifies several PRoW and promoted recreational routes that intersect with the Grid Cable Route search area, illustrated within figure 2.2b. The Council would highlight any claimed rights of way within, or intersecting with the proposed development footprint should also be considered within any assessment. The Council is pleased to see the scoping in of PRoW and promoted recreational routes for the construction and decommissioning. However, would also like to see the operational stage scoped in, potential effects on and access to impacted routes should be full considered within the ES.

Chapter 14: Transport and Access
The Council as Highway Authority will be seeking to ensure the traffic impact is acceptable with regards to highway capacity and safety and promotion of sustainable modes in line with National Planning Policy.

The Council is pleased to see a separate Transport Assessment (TA) would be prepared alongside the ES chapter on transport and access. The Council notes within paragraph 14.4.1.2 the TA would be prepared following consultation with LCC, this further communication and consultation is welcomed. Table 14.5 identifies the proposed elements to be scoped in/out, the Council has reviewed and would agree with the applicants assessment.

The Council would highlight the volume of NSIP scale developments within Lincolnshire, as refenced below, under chapter 17. Any transport cumulative assessment should consider other NSIP proposals and the potential combined impacts.

Chapter 15: Agriculture and Soils
Paragraph 15.6.1.2 identifies that the most disturbance to soil resource would be caused during construction, it states that '*most disturbance is anticipated to be due to the installation of permanent access tracks, substations and compounds, as well as temporary disturbance during the installation of the cables*'.

The likely significant effects identified within the Scoping Report are noted. Paragraph 15.8.1.1 states, '*The construction of the Proposed Development will result in the temporary but long term removal of land from its current agricultural use … for the lifetime of the Proposed Development (60 years), and the temporary but short-term use of agricultural land along the Grid Cable Route Search Area during the period of construction only.'.*

The scoping report and associated Figure 15.1 have assessed Natural England's provisional ALC map and has identified the majority of the grid cable route search areas to be of Grade 3 classification, with the southern grid cable route search area having a higher proportion of Grade 2. The Council notes that detailed ALC surveys are underway for the solar development site and would inform the ES. However, no mention has been made for surveys to be undertaken for the grid cable route search areas. The Council is of the opinion that detailed surveys should be undertaken across the development site, this extends to the grid cable route corridors.

Relying on secondary data without undertaking site specific surveys does not address land drainage issues. Land drainage is a key factor in assessing both land classification and the impact on land restoration particularly along any cable or grid connection route where trenches are dug or soils stripped, even temporarily. The impact of construction on land drainage should be included to be scoped in under table 15.4.

The grid cable route search areas encompass mainly open countryside that is largely arable farmland. The Council notes that a Outline Soil Management Plan (oSMP) would be submitted as part of the application, paragraph 15.7.2.3. The oSMP should consider the cable route in its entirety in order to minimise the impact on soil structure, land drainage and ultimately soil quality. Guidance is available in published documents

Soils and Structure
Soil structure can be significantly damaged during the construction phase of the process. There is a lot of trafficking of vehicles on the land to erect the panels and if this work is undertaken when soils are wet, there can be significant damage. Much of this damage can be remedied post construction but not all and it is possible that long term drainage issues occur on the site due to the construction. As such this should be considered as part of the EIA.

Decommissioning
The Scoping Report at paragraph 15.6.3.1 states that '*the effect on agricultural land quality at decommissioning will be influenced by the extent of disturbance caused by the removal of the solar PV panels, for example the presence and dimensions of leftover voids. It is assumed that vegetation planted for landscaping and ecological purposes would be left in-situ on handback of land to landowners following decommissioning (with the exception of grassland planted under the Panel Areas). It is currently anticipated that cables will be decommissioned in situ, in which case no further disturbance to the soil and land would be necessary along the Grid Cable Route Search Area'.*

Given the uncertainty of a 60 year timeframe presents, the scoping in of decommissioning is welcomed. At present there is no settled consensus as to whether a long term temporary use of land should be considered as not significant and therefore the loss of any BMV over the 20 hectare threshold may still be significant.

Agricultural land Classification (ALC)
Soil augering of the site should be undertaken in line with TIN 049 and the MAFF 1988 Guidelines, one auger point per hectare and with occasional soil pits particularly where soil types vary. On a site of this size the amount of augering should be around 900+ auger holes

and circa 6 or 8 pits to verify the soil profiles, with more required if there are significantly different soils.

Schedule 4, Part (y) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Ref 14-1) requires that Natural England be consulted if the area of a proposed permanent development exceeds 20 ha of Best and Most Versatile (BMV) land. Should this be the case, Natural England should be consulted for them to have an input into the ALC approach taken.

Cumulative ALC Impacts

There are a number of small(er) and largescale solar PV schemes in Lincolnshire, with others planned or proposed with most of the proposed solar sites on farmland. The situation is fluid as new proposals come forwards. Lincolnshire in particular has substantial areas of agricultural land, including a significant amount of land within the Best and Most Versatile (BMV) category of which 46% is Grade 1 and 2, and 52% Grade 3 (the split between Grade 3a and 3b is unknown). Only 1% of land in Lincolnshire is Grade 4 with no Grade 5 land recorded. District and County ALC: For a project of this scale there would likely be an impact BMV land, with the project occupying the land for many years. The area proposed to be occupied by the solar farm is large on a local basis and if the quantities of BMV are similar to other solar NSIP sites, then the impact would be expected to be significant at a District or County Level.

Ecological Effect

If the land is used for biodiversity, it would not be available for agriculture. However even if it is available for some form of cutting or grazing it is unlikely that the ALC grade will change significantly during the life of the project. There is evidence that organic matter builds up in biodiversity areas at a faster rate than arable farmland and this may benefit the land, but it is not a factor in the assessment of ALC.

Long term, where biodiverse land becomes ecologically important there is the possibility of this land becoming assigned with environmental designations, such as SSSI status, though generally this has not so far occurred on other solar sites.

Chapter 16: Other Environmental topics

Human Health

The Council disagrees with the developers' conclusion that all potential health impacts are scoped out at this stage.

It is important that the ES includes a comprehensive human health chapter as a minimum, which draws together the impacts on human health from each individual relevant chapter in the ES. The area is thought to be relatively open area so the development will be visible for some distance even if homes are not on the boundary. Even from a distance, the disruption to landscape views, a sense of space, and potential views of perimeter fencing could negatively affect people's wellbeing. The impact is also not just on residents, but on road users and people using the public rights of way network in the area. The effect on the landscape and visuals is most likely to lead to adverse mental health issues. Mental health does not appear to have been considered in the EIA, and it should be scoped in.

There is little mention of Electromagnetic Fields (EMF) in the scoping report. EMFs are referenced in paragraph 16.8.5.3 and with some mitigations based on sensitive receptors, with the overall view that risk is low. It must be proven that levels of EMFs will be below the International Commission on Non-Ionising Radiation Protection's (ICNIRP) recommended safe exposure limits, assessed alongside the cumulative effect of any other nearby existing or proposed electricity generating or transmission infrastructure. As the proposed development is cross boundary, Lincolnshire and Rutland would both be host authorities, the Council would expect that cumulative effects include developments in each county. Even if this development is proven to be safe for people's physical health, there is potential for adverse mental health impacts from people's perceived risk from EMFs, which must be mitigated.

Should the development be granted a DCO the Council would expect the human health chapter in the ES to cover how the development might enhance health and wellbeing of the population. For example, enhancements to the public rights of way network, with new habitats created alongside walking routes to increase biodiversity (e.g., wildflower meadows). Loss of high-value agricultural land is a concern to public health due to the importance of growing sufficient healthy, affordable food. Lower grade land used for solar arrays could potentially still be used for livestock grazing. There is no mention of enhancements that the development might bring in the EIA. This would be covered if a health impact assessment was provided as part of the DCO application process; however, in the its absence the Council's Public Health department would like to see commitment to follow the principle of a rapid, desktop health impact assessment when writing the human health chapter of the ES.

Materials and Waste

The Council welcomes reference to complying with waste legislation and to following the waste hierarchy principles.

Minerals and Waste Safeguarding

The Council notes that the grid cable route search areas intersect with both a Limestone Mineral Safeguarding Area MSA), a sand and gravel MSA (southern grid connection cable route search area only) and a site-specific MSA relating to Creeton Quarry. Also notable, Little Bytham Sewage Treatment Works and Creeton Quarry waste site are located within the grid connection cable route search areas identified.

The Scoping Report identifies at paragraph 16.4.2.2 that a Minerals Safeguarding Assessment would be provided within the application documents, this is welcomed.

Waste management

The Council notes that the Scoping Report at paragraph 16.9.1.3 and within Table 19-1 states that 'manufacturers of solar panels are legally required to take back old panels, under the WEEE directive'. This is concerning that the applicant may be relying on this assertion.

Whilst this may be the case in theory, the Council will expect to see documents showing the anticipated quantity of PV panel waste at each stage of the project and specifying the applicant's intentions for their management. In particular, consideration needs to be given for the current lack of recycling capacity locally, especially in the light of the cumulative quantities arising from multiple proposed NSIP-scale solar farms in the region.

The Council welcomes the proposal for re-use/resale of PV panels where possible within paragraph 16.9.1.8.

The Council awaits the applicant's clarification, in other documents, of the quantity, type and proposed fate of wastes generated at each stage of the project. In particular, there needs to be clarity regarding end-of-life PV panels in light of the large cumulative quantity arising from multiple proposed NSIP-scale solar farms in the region, and the current lack of recycling capacity.

Major Accidents or Disasters

It is noted that the Scoping Document confirms that an Outline Battery Safety Management Plan will be developed as part of the application documents, paragraph 16.6.4.1. However, there are currently no further details on which Lincolnshire Fire and Rescue Service (LFRS) can provide comment.

With limited details at this stage, LFRS would need to see the proposals within the safety plan to allow consideration of the details in the context of the development. The LFRS would be looking to ensure that minimum standards as outlined in the NFCC guidance is being adhered to, with specific details required. Please see advice letter at Appendix 1.

Chapter 17: Cumulative and in-combination effects

The Council welcomes the Applicant's approach to considering both cumulative (inter-project) and in-combination (intra-projects) effects and is pleased to see the inclusion of a standalone chapter within the ES for cumulative effects.

Table 17.2 within the Scoping Report identifies the initial long list search criteria for the inter project cumulative assessment, this table states the distance from solar development site for other NSIP developments would be 10km. The Council considers this area of search too narrow, the study area for the assessment of inter project effects should be sufficient in extent to capture all relevant projects within the Lincolnshire geographical boundary. There may be other factors across the wider county geography such as Best and Most Versatile Land, haulage routes, construction/employment traffic, solar waste arisings and port deliveries which overlap with other projects both geographically and/or temporally.

The Scoping Report at Appendix C identifies the long list of projects which the applicant considers would contribute to cumulative impacts. As above, the Council would expect this to be widened. Only three NSIP scale projects have made the long list, identified within paragraph 17.3.4.7. There is potential for significant cumulative impacts to arise from the combined effects of schemes of this scale. For example, in respect of loss of BMV agricultural land, impacts on the transport network and implications from solar waste arisings.

Consideration should be given to the cumulative effects over the lifetime of the developments, for example the combined impacts of operational failures and replacement, decommissioning (waste generation) of multiple solar schemes with similar 40 to 60 year lifespans. The County is currently host to 13 solar NSIP schemes at varying stages in the consenting process, this would mean circa 6770MW of installed solar capacity across Lincolnshire. Calculations derived from application documentation from several DCO applications indicate an approximate 1875 panels per MW of electricity. 6770 MW would consequently result in the installation of over 12 million panels. An approximate failure rate of 0.4% per annum results in the need for recycling capabilities to cope

with the 50,000 panels per annum generated from operational waste arisings across Lincolnshire solar schemes.

The Council would expect any standalone chapter for cumulative effects to cover both inter project and intra project effects. In addition to setting out the approach and methodology, the chapter should clearly identify all other relevant projects, the interrelationship between projects and the potential for cumulative effects, any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources. It should also provide an assessment of the significance of the potential cumulative impacts identified, likely duration of the impacts (including phasing details) and mitigation measures.

The Council will continue to engage with this proposal as required. Should there be any further queries, please do not hesitate to get in contact.

Yours sincerely,

Amy Charlesworth

For Neil McBride
Head of Planning

Appendix 2: Fire Service Advice

Lincolnshire
FIRE & RESCUE

Fire and Police Headquarters
Deepdale Lane
Nettleham
Lincoln
LN2 2LT
Tel: 01522 555777
www.lincolnshire.gov.uk/lfr

12/02/2025

Ref: Leoda Solar Farm
(NE of Leadenham & W of Broughton, North Kesteven)

To Who it May Concern,

TOWN AND COUNTRY PLANNING ACT 1990
PLANNING CONSULTATION – NOTES FROM THE FIRE AND RESCUE AUTHORITY

In order to be successful in firefighting, adequate access to buildings for fire appliances and immediate access to adequate supplies of water, must be provided. The access to, and proximity of, those water supplies directly affects the resources that Fire and Rescue Authorities need to provide in protecting and mitigating their communities from the effects of fire.

Please find below a list of Lincolnshire Fire and Rescue Authority requirements relating to access for fire appliances and firefighting water supplies.

ACCESS

1. Access to buildings for fire appliances and fire fighters must meet with the requirements specified in Building Regulations 2010 Part B5. For small buildings (up to 2000m², with a top occupied storey that is a maximum of 11m above ground level), vehicle access for a pump appliance should be provided to whichever is the less onerous of the following:

   a. 15% of the perimeter.
   b. Within 45m of every point of the footprint of the building

   For all other buildings, provide vehicle access in accordance with Table 15.1 of Approved Document. These requirements may be satisfied with other equivalent standards relating to access for firefighting.

   Lincolnshire Fire and Rescue requires a minimum carrying capacity for hard standing for pumping appliances of 18 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 part B5.

2. If it is not possible to provide access to the proposed development in accordance with the guidance details within Part B5 of Approved Document B, as compensation, Lincolnshire Fire and Rescue may accept the provision, at the developer's expense, of an automatic sprinkler system, designed, fitted and maintained in accordance with the relevant sections of BS5306/BSEN12845:2004.

   Should this option be considered, our Fire Safety advisers must be provided with detailed plans of the proposed sprinkler installation. Any scheme proposed should not be of a lesser standard than any provision as may be required by the Building Regulations.

   WATER SUPPLIES

3. A building requires additional fire hydrants if both of the following apply.

   a. It has a compartment with an area more than 280m2.
   b. It is being erected more than 100m from an existing fire hydrant.

   If additional hydrants are required, these should be provided in accordance with the following:

   a. For buildings provided with fire mains – within 90m of dry fire main inlets.
   b. For buildings not provided with fire mains – hydrants should be both of the following:
   i. Within 90m of an entrance to the building.
   ii. A maximum of 90m apart.

   **All fire hydrants should conform to BS750-2012 Each fire hydrant should be clearly indicated by a plate, fixed nearby in a conspicuous position, in accordance with BS 3251.*
   Guidance on aspects of provision and siting of private fire hydrants is given in BS 9990. Fire hydrant acceptance testing will be carried out by a Hydrant Inspector on completion and a standard hydrant marker "H" plate will be fitted nearby. Following adoption the Fire Service will be responsible for the ongoing maintenance and repairs for the lifetime of the fire hydrant.

4. Where at the time, it is not possible to determine the number of fire hydrants required for firefighting purposes, the requirement should be determined at the water planning stage when site plans have been submitted by the water companies.

5. Where no piped water supply is available, or there is insufficient pressure and flow in the water main, or an alternative arrangement is proposed, the alternative source of supply should be provided in accordance with the following recommendations

   a. a charged static water tank of at least 45,000 litres capacity; or

b. a spring, river, canal or pond capable of providing or storing at least 45,000 litres of water at all times of the year, to which access, space and a hard standing are available for a pumping appliance; or
c. any other means of providing a water supply for firefighting operations considered appropriate by the fire and rescue authority.

ENVIRONMENTAL

6. Bulk storage of highly flammable/explosive/water reactive/toxic substances and any site whereas large scale recycling activities are proposed will need to be specifically consulted with Fire Authority to ensure that the full operational impact, should a fire occur, is assessed and that an adequate provision is recommended.

7. There are a number of methods available, through which the fire water runoff problem can be addressed, the most obvious being to use a fire suppression system to contain a fire, thus not requiring large volumes of water and containment measures, such as bund walls or drainage systems with lagoons, interceptors, reed beds or treatment plants. It is not for the fire service to stipulate which approach to take, simply to ensure that suitable measures are made a condition of planning approval through a firefighting water run-off strategy.

Battery Energy Storage System (BESS) Requirements

Lincolnshire Fire and Rescue (LFR) recognises the use of batteries (including lithium-ion) as Energy Storage Systems (ESS) is a new and emerging practice in the global renewable energy sector. As with all new and emerging practices within UK industry the Service would like to work with the developers to better understand any risks that may be posed and develop strategies and procedures to mitigate these risks.

We will work and engage with the developer as the project evolves, to ensure it complies with the statutory responsibilities that we enforce.

The developer should produce a risk reduction strategy (Regulation 38 of the Building Regulations) as the responsible person for the scheme as stated in the Regulatory Reform (Fire Safety) Order 2005. We would also expect that safety measures and risk mitigation is developed in collaboration with LFR.

The strategy should cover the construction, operational and decommissioning phases of the project.
During the construction phase the number of daily vehicle movements in the local area will significantly increase. The Service will want to view the transport strategy to minimise this impact and prevent an increase in the number of potential road traffic incidents. Any development should not negatively impact on the Service's ability to respond to an incident in the local area.

LFR works within the guidance of the National Fire Chief's Council (NFCC) who have been working with several government departments to ensure that fire and rescue services are made aware of any new proposals. NFCC have created a guidance document (link below) that constitutes LFR's requirements for new BESS development proposals.

NFCC Grid Scale BESS planning – Guidance for FRS (nfcc.org.uk)

Following the work of NFCC, the Department for Levelling Up, Housing and Communities (DLUHC) has revised its Planning Policy Guidance to include reference to BESS. The guidance is available here: **Renewable and low carbon energy – GOV.UK (ww.gov.uk)**

LFR are aware that large scale BESS is a fairly new technology, and as such risks may or may not be captured in current guidance in pursuance of the Building Regulations (as amended) and the Regulatory Reform (Fire Safety) Order 2005. This will highlight challenges the FRS have when responding to Building Regulations consultations. For this reason, we strongly recommend applying the National Fire Protection Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems.

Failure to comply with the above requirements at planning stage can seriously compromise firefighting operations resulting in unnecessary risk to life, loss of property and unnecessary damage to the environment.

Should you wish to discuss adequacy of access or water supplies to your proposed development, please contact the Community Fire Protection department on 01522 553868.

Yours faithfully

Nick Morris

Station Manager Prevention & Protection
Lincolnshire Fire and Rescue
Lincolnshire County Council
Fire & Police Headquarters Deepdale Lane Nettleham

Lincolnshire
FIRE & RESCUE

Fire and Police Headquarters
Deepdale Lane
Nettleham
Lincoln
LN2 2LT
Tel: 01522 555777
www.lincolnshire.gov.uk/lfr

My Reference: EN0110022JR
Your Reference: EN0110022

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Briston
BS1 6PN

For attention of Gary Chapman
Sent by email to **Kilnsideenergypark@planninginspectorate.gov.uk**

27/06/25

Development: Application by Kilnside Energy Park Limited (the applicant) for an Order granting Development Consent for the Kilnside Energy Park (the proposed development)

Location: Kilnside Energy Park

Battery Energy Storage System (BESS) Requirements.

We would ask that all the below requirements are met otherwise we would object to this development:

Recognising that Lincolnshire Fire and Rescue (LFR) are statutory consultees as a result of the Planning Act 2008 and applications that involve 'National Significant Infrastructure Projects' (NSIPs), we will work and engage with the developer as the project evolves, to ensure it complies with the statutory responsibilities that we enforce.

The developer should produce a risk reduction strategy (Regulation 38 of the Building Regulations) as the responsible person for the scheme as stated in the Regulatory Reform (Fire Safety) Order 2005. We would also expect that safety measures and risk mitigation is developed in collaboration with LFR.

The strategy should cover the construction, operational and decommissioning phases of the project.
During the construction phase the number of daily vehicle movements in the local area will significantly increase. The Service will want to view the transport strategy to minimise this impact and prevent an increase in the number of potential road traffic incidents. Any development should not negatively impact on the Service's ability to respond to an incident in the local area.

Lincolnshire Fire and Rescue (LFR) recognises that Battery Energy Storage Systems (BESS), including those using lithium-ion technology, represent a rapidly evolving area within the renewable energy sector. We are

committed to working collaboratively with developers to identify and manage the associated fire safety risks at every stage of development.

LFR works within the guidance of the National Fire Chief's Council (NFCC) who have been working with several government departments to ensure that fire and rescue services are made aware of any new proposals. NFCC have created a guidance document (link below) that constitutes LFR's requirements for new BESS development proposals.

Grid Scale Battery Energy Storage System planning – Guidance for FRS (nfcc.org.uk)

Following the work of NFCC, the Ministry Of Housing Community and Local Government has revised its Planning Policy Guidance to include reference to BESS. The guidance is available here:

https://www.gov.uk/guidance/renewable-and-low-carbon-energy

LFR are aware that large scale BESS is a fairly new technology, and as such risks may or may not be captured in current guidance in pursuance of the Building Regulations (as amended) and the Regulatory Reform (Fire Safety) Order 2005. This will highlight challenges the FRS have when responding to Building Regulations consultations. For this reason, we strongly recommend applying the National Fire Protection Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems.

LFR emphasises the importance of early and continued engagement to develop robust fire safety provisions that reflect both statutory requirements and emerging best practices. LFR recognise this as the initial planning consultation and further development of the requirements will happen during further engagement,

Should you wish to discuss your proposed development, please contact **LFR Fire Safety team** at Fire.Safety@lincolnshire .gov.uk

Yours faithfully,

Jessica Rousseau

Jessica Rousseau
Water Planning Manager
Lincolnshire Fire and Rescue
Email: Fire.Safety@lincolnshire.gov.uk

From: [redacted]
To: Kilnside Energy Park
Subject: 25/00680/NEI - Kilnside Energy Park
Date: 09 July 2025 09:49:02
Attachments: image001.jpg

You don't often get email from [redacted]@melton.gov.uk. Learn why this is important

Good afternoon

I am responding on behalf of Melton Borough Council to the application for Kilnside Energy Park (ref: EN0110022).

We have no objections to the proposal.

Regards

Mrs Deirbhile Blair

Planning Development Officer

Follow us @MeltonBC

Please note that we are currently experiencing delays in the processing and determination of planning applications and enquiries for full details please visit

Planning application delays – Melton Borough Council

Visit our website for the easy way to access services 24/7

We work flexibly, so if you've received this email outside of "normal" working hours, whilst it suits me to email now, I do not expect a response or action outside of your working hours.

[redacted]

Ministry of Defence

Safeguarding Department

DIO Head Office

St George's House

Whittington

Lichfield

Staffordshire WS14 9PY

Defence Infrastructure Organisation

Planning ref: EN0110022

DIO ref: 10068035

Gary Chapman

The Planning Inspectorate

Environmental Services Operations Group 3

Temple Quay House 2 The Square

Bristol

BS1 6PN

17th July 2025

Dear Gary,

Re: Scoping Opinion EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification

Thank you for consulting the Ministry of Defence (MOD) on the above Scoping Opinion which was received by this office on 23/06/2025.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of Defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

A scoping opinion is being sought on a proposal to create an energy park comprising of a solar farm and on site energy storage facilities on a site near Great Casterton in Lincolnshire.

At this stage, because details of the scale of the Solar Farm and supporting infrastructure are not available, and only a scoping area for the proposed development has been provided, only an initial assessment has been completed and we can provide the following advice.

The proposed development site occupies multiple safeguarding zone's surrounding RAF Wittering and the East 1 Wide Area Multilateration (WAM) network. The proposed site occupies the statutory aerodrome height and birdstrike safeguarding zones surrounding the RAF Wittering and the East 1 WAM technical safeguarding zone. RAF Wittering has been identified as a an aviation receptor in the Scoping Report.

After carrying out an initial assessment the Ministry of Defence can advise:

Technical

Based on the information provided, a solar array at this location could have the potential to cause an infringement of the East 1 WAM safeguarding protection criteria. The East 1 WAM network provides secondary surveillance radar coverage to aircraft operating in the area. Once further details are made available i.e. site layout, panel dimensions etc, a further, more detailed assessment can be undertaken. Dependent on the outcome of this assessment, it may be necessary for a Requirement to be applied to the Development Consent Order to manage any effects of electromagnetic noise interference, that this array may cause.

Aerodrome heights

The airspace above and around aerodromes is safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre. This development site sits beneath a piece of protected airspace called the Obstacle Limitation Surface (OLS). The OLS needs to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely. We do not expect the new development to cause an infringement of RAF Wittering's OLS.

Glint and Glare

A solar array at this location has the potential to cause Glint and Glare to aircraft operating in and out of RAF Wittering. Should this proposal progress, we would expect a Glint and Glare report assessment to be submitted in support of the application.

Birdstrike

Within this zone, the principal concern of the MOD is that the creation of new habitats may attract and support populations of large and, or flocking birds close to the aerodrome. The space beneath solar panels can provide attractive habits to birds as well as associated biodiversity enhancements. Should this application progress, the MOD will need to be consulted on any biodiversity and landscaping schemes.

The applicant should consider all the above safeguarding advice in their preparation of their Draft Development Consent Order, and the MOD should be consulted as it progresses. The MOD's advice may change subject to further details being provided and more detailed assessments being conducted.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours Sincerely

[redacted]

Safeguarding Manager

Our ref: NH/25/11750
Your ref: EN011022

Kilnside Energy Park

[redacted]
Assistant Spatial Planner
The Cube
199 Wharfside Street
Birmingham
B1 1RN

Tel: [redacted]

21 July 2025

Via email: kilnsideenergypark@planninginspectorate.gov.uk

Dear Sir or Madam,

EIA Scoping Report for the development of Kilnside Energy Park, a solar farm including solar photovoltaic (PV) generating panels and on-site energy storage facilities, works to facilitate access to the proposed development at a site near Great Casterton within the administrative boundary of Rutland County Council (RCC),

Thank you for giving National Highways (formerly Highways England) the opportunity to comment on the above-mentioned EIA scoping opinion.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In responding to sustainable development consultations, we have regard to DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of plans and development management considerations. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

The SRN in the vicinity of the application site is the A1 trunk road.

Screening and Scoping for an Environmental Impact Assessment (EIA)

It is understood by National Highways that due to the nature of the development and size of the application area exceeding 25 hectares, the proposal falls within Schedule 1

of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations"). As such, any planning application would need to be accompanied by an Environmental Impact Assessment.

In accordance with the above, the applicant is seeking formal confirmation from Rutland County Council that an EIA is required and a formal scoping to determine the items for inclusion in the EIA.

Development Proposal

The proposed development comprises of a proposed solar farm including solar photovoltaic (PV) generating panels and on-site energy storage facilities as well as works to facilitate access. The nearest point of potential impact of the proposed development on the Strategic Road Network (SRN), is the A1 which both bisects and borders the site. It is noted that the A1 has three junctions located within the development vicinity.

National Highways Considerations

Boundary Matters

The site shares a common boundary with the A1 trunk road which is part of the strategic road network owned and operated by National Highways. Its proximity to the A1 could generate potential boundary related impacts as set out below:

Drainage

Drainage proposals will be of particular interest to National Highways to ensure that surface water run-off from the site does not threaten the integrity of National Highways drainage assets. As set out in Paragraph 59 of DfT Circular 01/2022, National Highways will not accept any water run-off arising from any change of use into our highway drainage systems, or any new connections into those systems from third party development drainage systems. We should therefore be consulted on a surface water drainage strategy for the site to understand the proposal for managing the site's drainage. In addition, prior to the commencement of the development, we should be consulted on a detailed drainage scheme to be designed in accordance with the agreed drainage strategy.

Buildings and Structures

Buildings and structures should be positioned at a sufficient distance from our network so as not to cause a concern for National Highways. Any buildings or structures that are within the 'fall distance' of National Highways network will need structural approval from National Highways and we should be consulted on building design and materials.

Boundary Treatments and Landscaping

National Highways should be consulted on a boundary treatments and a landscaping plan which should clearly set out any proposed boundary treatments and landscaping work near to our network. The distance of proposals (in metres) from our network should be clearly identified. All boundary treatments and landscaping should be positioned entirely within the red line boundary of the site and far enough within the site that it can be installed and maintained without encroachment onto National Highways land. This applies to fences and all vegetation for the duration of their life. If landscaping or boundary treatments are in excess of 10 metres from our boundary (this is our land boundary, not the carriageway), it is usually the case that no further information is required, although the applicant may need to demonstrate that the distance is sufficient. Where landscaping etc is within 10 metres of our boundary, further details will need to be provided for National Highways approval. For instance, some plants are particularly invasive and can pose a threat to our own vegetation and assets. Further information on the species of plants to be avoided can be provided if required.

Geotechnical

Any excavation and/or landscaping works has the potential to undermine the integrity and stability of the adjacent highway network. As such, if excavation works are within 10 metres of our boundary, prior to the commencement of any excavation (including in relation to landscaping), it would be necessary to set out how geotechnical risks will be identified and managed. This would be undertaken in accordance with Chapter CD122 of the Design Manual for Roads and Bridges (DMRB) and would need to be submitted for our review and approval. In addition, further information would be required with reference to BS5837: 2012 Trees in relation to design, demolition and construction. This is to ensure that our tree stock and associated root systems are protected.

Lighting

Any external lighting schemes have the potential to cast a glare on the adjacent highway causing a road safety hazard. As such, National Highways should be consulted on the details any external lighting schemes.

Traffic and Transport

General aspects to be considered in all cases include:

- We acknowledge that a Transport Assessment (TA) and a Construction Traffic Management Plan (CTMP) will be prepared in support of the forthcoming planning application, and we look forward to receiving these documents for review.
- An assessment of transport-related impacts of the proposal should be carried out and reported as described in the Department for Transport's 'Guidance on

Transport Assessment (GTA)' and DfT Circular 01/2022. Although the GTA guidance has been archived, it still provides a good practice guide in preparing a TA. In addition, the Department for Levelling Up, Housing, Communities and Local Government also provides guidance on preparing TAs.

- The environmental impact arising from any disruption during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported.
- Adverse changes to noise and air quality should be considered, in relation to compliance with the Air Quality Standard Regulations, EU Exit regulations, and/or in local authority designated Air Quality Management Areas (AQMAs).

Site-Specific considerations

Following a review of the EIA Scoping Report, we have set out our comments below.

- We note that optioneering for site access is currently ongoing. It is anticipated that a minimum of three vehicular access points will be required to serve the site during the construction and decommissioning phases of the proposed development.
- We welcome confirmation of the proposed access strategy in due course. It is noted that internal routes will be established within the site to manage vehicle movements and, as far as reasonably practicable minimise disruption to the surrounding road network and reduce potential transport impacts.
- We note that construction of the Proposed Development may commence in 2029, subject to consent and investment decisions, and is expected to last approximately 24 months. We are looking forward to reviewing the anticipated construction programme as part of CTMP. Also, we acknowledge that construction traffic for the proposed development is unlikely to overlap with other major developments in the area, including the Mallard Pass Solar Farm. However, we advise collaboration with the relevant local authorities to confirm this matter.
- We request that the peak construction year be confirmed within the TA and CTMP.
- During the operational phase, we understand that multiple access points, including dedicated emergency access routes, are expected to ensure site safety and operational resilience.
- It is noted that the A1 will be the likely route used for construction traffic, including HGVs and Abnormal Indivisible Loads (AIL). We would welcome further information on the number, frequency and routing of these movements as part of the CTMP.

<u>Transport and Access Considerations</u>

We have reviewed Transport and Access chapter in the EIA Scoping Report and have the following comments and observations.

Study Area

We note that the extent of study area for the assessment is yet to be determined, and we welcome that the extent of the study area be discussed with National Highways, Rutland County Council and Lincolnshire County Council.

Legislation, Planning Policy Context and Guidance

National Highways' approach to planning is stated in DfT's Circular 01/2022, "Strategic Road Network and the Delivery of Sustainable Development" (the Circular). The approach taken to progressing this development should align with and reference the Circular.
Further, the IEMA Guidelines for the Environmental Assessment of Traffic and Movement are used to examine the environmental impacts of the development in terms of traffic and movement.

Assessment Methodology

We note that a separate TA will be prepared in relation to the proposed development which will set out the overarching transport strategy and consider impacts on the operation of the strategic transport network, including key junctions identified through scoping discussions with National Highways.

Future Baseline

We note that the future baseline would be based on the peak construction year and TEMPro will be used to estimate future year flows. We welcome the approach that the growths obtained from TEMPro would be balanced against any other significant development which could alter the baseline traffic flows. We recommend collaboration with relevant local authorities to identify the potential future baseline developments in the vicinity of the proposed development.

Potential Effects

We acknowledge that during the peak construction period it is anticipated that there will be a maximum of 60 HGV trips per day (120 two-way movements), distributed across multiple access points serving the site. These HGV movements will be actively managed to avoid the traditional peak hours of the SRN, to minimise disruption to general traffic.

Similarly, during the peak construction period 350 personnel are expected on site per day, with an average of 150-200 personnel. We welcome further information on the impact of construction traffic on the SRN in the TA, and the development of a CTMP and a Framework Construction Worker Travel Plan (CWTP), noting that these two plans could be combined.

Operation

We note that operational traffic associated with the proposed development is expected to be minimal. Consequently, the impact on the SRN during the operational phase is anticipated to be negligible, even during peak periods.

Decommissioning

The decommissioning works are expected to result in similar or less vehicles than the numbers anticipated in the construction phase.

Mitigation

Subject to the extent of the impact of construction traffic on the SRN, mitigation may be required. National Highways will be able to advise on this once the results of scenario testing have been submitted for our review.

Noise Considerations

Chapter 12 of the EIA scoping report covers Noise and Vibration and scopes in impacts on the surrounding road network due to construction traffic, and scopes out impacts due to operational traffic.

The scoping report identifies the closest Noise Important Area (NIA) to the site as NIA ID 7891 on the A1. Further NIAs are located to the north and south on the A1. The report states that 'further consideration will be given to whether the road traffic NIA will be potentially affected by increases in traffic noise on the wider road network in the ES'.

The methodology proposed for assessing construction noise impacts is in accordance with the current relevant guidance: Calculation of Road Traffic Noise (CRTN) and the Design Manual for Roads and Bridges (DMRB) LA 111. Mitigation measures will be set out in the application in an Outline Construction Traffic Management Plan (oCTMP).

The report identifies that up to 60 HGV trips per day (120 two-way movements) are anticipated during construction, and that depending on the routes taken there is the potential for this to give rise to likely significant noise effects. It is likely that any significant noise effects due to construction traffic will be limited to the local road network and not the A1.

We are content with the proposed scope and assessment methodology for construction traffic noise and vibration impacts. We recommend that the assumptions regarding minimal operational traffic impacts made within the Scoping Report are confirmed in the application. This would enable the conclusion that operational traffic noise impacts can be scoped out of the assessment.

Glint and Glare Considerations

The scoping report includes relevant details to support a scope out of glint and glare from the Environmental Statement (ES) and to instead provide analysis as a standalone report supporting the ES and the Landscape and Visual Impact Assessment (LVIA).

The details include:

- Introductory information
  - Including legislation, policy, standards and guidance
- Outline of receptors with a focus on aviation
  - The A1 is identified as a road receptor
- Overview of likely significant effects
- Preliminary mitigation
- Next steps

The approach described is reasonable. We recognise at this stage that more detailed information regarding analysis will be provided in the technical report. However, based on the preliminary identification of receptors we would recommend that ground based receptors are carefully reviewed so that a robust assessment is provided for road, rail, dwellings and PRoW as applicable.

We note separately that lighting has been raised as a potential issue, however this has not been identified as a source of glare outside of the industry standard reference to ILP guidance in relation to a lighting impact assessment. Based on the design intent for minimal exterior lighting, a qualitative assessment is proposed as part of the LVIA. This seems reasonable but we would recommend monitoring the design proposals as increasing the intended provision of external lighting could introduce a greater potential for glare to occur.

Summary

Please note that these comments imply no pre-determined view of the acceptability of the proposed development in terms of traffic, environmental, or highway considerations. These comments relate specifically to matters arising from National Highways' responsibilities to manage and maintain the Strategic Road Network (SRN) in England, in line with DfT's Circular 01/2022 to support sustainable delivery of growth. For comments related to the local road network, please consult the appropriate local highway authority. The Local Planning Authority will determine the final scope of the Environmental Statement.

Please do not hesitate to contact me if you require any further information or clarification.

If I can be of any further assistance on this matter, please do not hesitate in contacting me.

Yours sincerely,

[redacted]
[redacted]
Midlands Operations Directorate
Email: [redacted]@nationalhighways.co.uk

From:	NATS Safeguarding
To:	Kilnside Energy Park
Subject:	RE: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification [SG39634]
Date:	25 June 2025 14:22:12
Attachments:	~WRD0002.jpg image003.png image004.png image005.png image006.png image007.png image008.png image009.png image010.png

Our Ref: SG39634

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk
4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Internal

From: Kilnside Energy Park
Sent: 23 June 2025 10:16
To: Kilnside Energy Park
Subject: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification

Dear Sir/Madam,

Please see attached correspondence on the proposed **Kilnside Energy Park.**

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the

Date: 18 July 2025
Our ref: 516768
Your ref: EN0110022

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Gary Chapman
Planning Inspectorate
kilnsideenergypark@planninginspectorate.gov.uk

BY EMAIL ONLY

Dear Gary Chapman

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: EIA scoping opinion for proposed Kilnside Energy Park.
Location: Great Casterton, Rutland

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 23 June 2025, received on 23 June 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

To date, Natural England have not been engaged with the project during the pre-application stages. As such, our advice at this stage is limited, and based upon the information set out within the EIA Scoping Report. Should the Applicant wish to consult with Natural England further during the Pre-Application period, we would be happy to engage via our Discretionary Advice Service.

Detailed advice on scoping the Environmental Statement is available in the attached Annex.

For any further advice on this consultation please contact the case officer Hannah Ezard Kay and copy to consultations@naturalengland.org.uk.

Yours sincerely

Hannah Ezard Kay
Sustainable Development Higher Officer
East Midlands Area Team

Annex A – Natural England's Advice on EIA Scoping

1. General principles

1.1. Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an ES to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided[1].
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

Natural England have not been engaged with the project up until this point, however, based on the EIA Scoping Report provided, it appears that these principles are likely to be met.

2. Cumulative and in-combination effects

2.1. The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

2.2. Please consider the following and whether we are aware of other projects we think do need to be considered. A list of project NE are aware of are presented in Table 1.

2.3. An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

[1] National Infrastructure Planning Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements (see Insert 2 – information to be provided with a scoping request)

a. existing completed projects
b. approved but uncompleted projects
c. ongoing activities
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Table 1: Plans or projects that Natural England are aware of that might need to be considered in the ES	
Project / Plan	*Status*
National Grid Weston Marsh to East Leicestershire	In pre-application stage
Mallard Pass Solar Farm	Approved

3. Environmental data

3.1 Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx.

3.2 Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

3.3 Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

3.4 Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local Wildlife Trust, local geo-conservation group or other recording society.

4. Biodiversity and geodiversity

4.1 The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

4.2 Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines and an EcIA checklist have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

5. International and European sites

5.1 The development site is within or may impact on the following **European / Internationally designated nature conservation site(s):**

- Rutland Water Special Protection Area (SPA) / Ramsar

5.2 The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes SPAs, Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA. European site conservation objectives are available at http://publications.naturalengland.org.uk/category/6490068894089216 .

5.3 Natural England's Impact Risk Zones incorporate internationally designated sites and features and can be used to help identify the potential for the development to impact on a European Site. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal. You can access this information through NE Maps.

5.4 Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

5.5 Table 2 outlines potential impact pathways where further information/assessment is required. The advice is based on the information provided at this stage. NE may have additional comments to make when further information is provided.

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites		
Site name with link to conservation objective	**Features which the ES will need to consider**	**Potential impact pathways where further information/assessment is required**
Rutland Water SPA: **European Site Conservation Objectives for Rutland Water SPA - UK9008051** Rutland Water Ramsar: **Designated Sites View**	Rutland Water SPA: Qualifying bird species and assemblages. Rutland Water Ramsar: Qualifying bird species.	• Long term loss or damage to supporting habitats, functionally linked land (FLL), and fragmentation (including barriers). • Changes in water quality and quantity at Rutland water and FLL across all developmental stages. • Noise & visual disturbance to birds during construction and decommissioning, including at FLL. The EIA scoping report focuses on human receptors when evaluating noise and vibration (Section 12). Natural England note that despite the presence of bird interest at the scoped-in sites, there is no noise modelling proposed for ecological receptors. There is a potential impact pathway from noise and visual disturbance to SPA and Ramsar birds including through disturbance of FLL. A baseline study should be carried out in conjunction with impact assessment to noise and visual disturbance for qualifying species. Section 9.4.1.1 notes that wintering bird surveys were undertaken between November 2024 and March 2025. We normally advise the wintering period should include Oct – Mar so expect to see appropriate justification for this decision or confirmation of further survey plans. Natural England welcome the commitment to breeding season avoidance during construction and decommissioning, we reaffirm the importance of this due to the presence of notified breeding birds at the SPA/Ramsar.

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites		
Site name with link to conservation objective	**Features which the ES will need to consider**	**Potential impact pathways where further information/assessment is required**
		Table 9-5 proposes a breeding bird survey, Natural England advise this should be included due to the qualifying species at Rutland Water.
Grimsthorpe SAC, Barnack Hills & Holes SAC, Baston Fen SAC	Qualifying designated features.	Natural England concurs with the decision (Table 9-6) that the noted SACs can be scoped out of the EIA but included in the HRA screening.

6. Nationally designated sites – Sites of Special Scientific Interest

6.1 Sites of Special Scientific Interest (SSSI) are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.

6.2 Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

The development site is within or may impact on the following **Sites of Special Scientific Interest:**

- Clipsham Old Quarry and Pickworth Great Wood Site SSSI
- Bloody Oaks Quarry SSSI
- Ryhall Pasture and Little Warren Verges SSSI
- East Wood, Great Casterton SSSI
- Holywell Banks SSSI
- Tickencote Marsh SSSI
- Tolethorpe Road Verges SSSI
- Great Casterton Road Banks SSSI
- Empingham Marshy Meadows SSSI
- Shacklewell Hollow SSSI
- Castle Bytham Quarry SSSI
- Swinstead Valley SSSI
- Grimsthorpe Park SSSI
- Newell Wood SSSI

6.3 The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within each SSSI, and identify appropriate mitigation measures to avoid, minimise or reduce any identified adverse significant effects.

Table 3: Potential risk to identified Nationally Designated Sites

Site name	Potential impact pathways where further information/assessment is required
• Newell Wood SSSI	Newell Wood SSSI borders the development. Direct habitat loss or damage is a potential impact from construction and decommissioning phases. Natural England welcome the use of a minimum 15m buffer from trees within this site (2.4.1.2) to avoid root damage. Natural England's standing advice on ancient woodland and veteran trees can be found here and gives further advice on development avoidance and mitigation measures to ancient woodland and ancient & veteran trees: Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK .
• Clipsham Old Quarry and Pickworth Great Wood Site SSSI • Bloody Oaks Quarry SSSI • Ryhall Pasture and Little Warren Verges SSSI • East Wood, Great Casterton SSSI • Holywell Banks SSSI • Tickencote Marsh SSSI • Tolethorpe Road Verges SSSI • Great Casterton Road Banks SSSI • Empingham Marshy Meadows SSSI • Shacklewell Hollow SSSI • Castle Bytham Quarry SSSI • Swinstead Valley SSSI • Grimsthorpe Park SSSI	A SSSI impact assessment will be required to provide an assessment of the impacts to features which are only notified as part of the SSSIs, as well as the assessment of those which are also designated as European site features in Table 2. The impact pathways to be considered within the assessments are the same as stated above for the International/European designations in Table 2, including noise/vibration/light and recreational disturbance from new access routes, air quality, water quality and quantity, direct damage and habitat loss or fragmentation and pollution. Natural England notes that multiple SSSI's lie within 200m of construction and decommissioning activities, including the cable route. Any construction activity within 200m will have to consider impacts through air quality, dust, disturbance, physical dangers (e.g uncovered pits), water/discharge and pollutants.

7. Regionally and Locally Important Sites

7.1 The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local sites are identified by the local Wildlife Trust, geoconservation group or other local group. The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes.

7.2 Natural England welcome the inclusion of Local Nature Conservation Sites within the EIA Scoping Report.

8. Protected species

8.1 The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System.

8.2 The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

8.3 The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

8.4 Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing Natural England wildlife licences. Applicants can also make use of Natural England's charged service Pre Submission Screening Service for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning for details of the LONI process.

8.5 Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. Applicants should check to see if a mitigation licence is required using NE guidance on licencing NE wildlife licences. Natural England are unable to advise upon the need for a licence; this responsibility falls to the developer.

8.6 Where licence need is identified, applicants should also make use of Natural England's charged Pre Submission Screening Service, during the pre-application stages, for a review of a draft wildlife licence application. Through this service Natural England will review a full draft licence application to issue a Letter of No Impediment (LONI) which

explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning contains details of the LONI process.

9. Priority Habitats and Species

9.1 Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

9.2 Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.

9.3 An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

9.4 The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

10. Ancient woodland, ancient and veteran trees

10.1 Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

10.2 An area of Ancient woodland has been identified within the search area for the project. The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

10.3 Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland.

10.4 The ancient tree inventory provides information on the location of ancient and veteran trees.

10.5 Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.

11. Biodiversity net gain

11.1 The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025.

11.2 Natural England welcomes that the applicant is committed to a minimum of 10% Biodiversity Net Gain (BNG) for the Proposed Development. Biodiversity Net Gain outcomes can be achieved on-site, off-site or through a combination of both, however, on-site provision should be considered first.

11.3 In order to maximise nature recovery and target habitat enhancement where it will have the greatest local benefit it is recommended that locally identified opportunities should be acknowledged and incorporated into the design of BNG (both on and off-site). This should include any locally mapped ecological networks and priority habitats identified within and close to the development site. Natural England recommend consultation with any local bodies, who may be able to provide invaluable local knowledge to help steer the mitigation and enhancement proposed at the site.

11.4 In addition, Local Nature Recovery Strategies (LNRS) are a new mandatory system of spatial strategies for nature established by the Environment Act 2021 which will contribute to the national Nature Recovery Network (NRN). Work is currently underway to develop these strategies, which will identify strategic priorities for nature protection, recovery, and enhancement. Given the size and scale of the project, there are opportunities not only for enhancing biodiversity in the locality, but also to create and enhance ecological connectivity in the area, contributing to the Nature Recovery Network and climate change resilience.

12. Connecting people with nature

12.1 The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 104 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

12.2 Natural England welcome the commitment to maintain and enhance Public Rights of Way (PRoW), and to temporarily divert routes where possible to continue to allow the public access to green space.

12.3 Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the

role that natural links have in connecting habitats and providing potential pathways for movements of species.

12.4 We would direct the Applicant to Natural England's Green Infrastructure Framework[2] as an approach to ensure the Green Infrastructure Strategy and Standards are of a high quality. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

13. Soils and agricultural land quality

13.1 Due to the scale of the project, there is potential for significant impacts to soil functions and services and to Best and Most Versatile (BMV) agricultural land.

13.2 Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land[3].

13.3 The following issues should be considered and, where appropriate, included as part of the ES:

- The degree to which soils would be disturbed or damaged as part of the development.
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted.

13.4 We note the commitment to an ALC survey for the solar development site but find that it was not explicitly noted whether or not the cable routes would be surveyed. We would expect this information to be provided and recommend the ALC survey covers the solar arrays and cable pathway. The ALC survey should be used to inform the final design of the project and inform micro-siting of infrastructure such as the BESS and cabling to avoid BMV land. The ES should set out details of how any adverse impacts on BMV agricultural land have been minimised through site design / masterplan.

13.4 Natural England would provide the following advice in relation to the ALC survey and consideration of soils and Best and Most Versatile Land within the ES:

The ALC survey should be undertaken at a detailed level (1 auger per ha) across the **entire development site, including any cable routes, mitigation areas etc.** The survey data should inform the soil management plan for the site, including suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space). The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts during construction, operation and decommissioning.

13.5 The EIA scoping report covers impacts to soil well, and Natural England supports the use of IEMA guidance. Further focus will be required on soil management and handling, following the impact assessment. Matters not limited to soil stripping, storage, and

[2] Green Infrastructure Home
[3] Guide to assessing development proposals on agricultural land - GOV.UK

reinstatement should be covered. Further information and guidance in this respect is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction, which Natural England consider should be followed.

13.6 Natural England welcome the decision to drive the panels into the ground as an alternative to concrete bases as this supports reversible development. Results of the ALC survey should be presented to indicate the land take (including amount of BMV land) for each element of the proposals, i.e. Solar PV areas, cable routes, access tracks, BESS/substation infrastructure and mitigation/enhancement areas. This should also include clarity regarding any agricultural land to be permanently lost.

13.7 We welcome decommissioning impacts being scoped into the ES and the time limited consent to be applied for (60 years). This will ensure soils and BMV agricultural land impacts to be temporary and able to be reinstated back to their pre-construction status and ALC grade.

14. Water quality

14.1 As identified in the EIA scoping report (10.5.1.22), there are two groundwater dependant sites within 1km of the development (Tickencote Marsh SSSI and Grimsthorpe Park SSSI). Natural England welcome the use of a Construction Environment Management Plan (CEMP) and a Decommissioning Environment Management Plan (DEMP), these must include measures to control pollution and discharge from the site and ensure the water quality and quantity at the SSSI's are not impacted.

14.2 We welcome reference to the CIRIA Sustainable Drainage Systems (SuDS) guidance and advise that SuDs methods address both volume and quality of surface water.

14.3 All protected sites within the search area should be evaluated for hydrological impact pathways especially during the construction and decommissioning phases. Natural England support the inclusion of functionally linked land in the consideration of hydrological impacts.

15. Climate Change

15.1 The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development will embed Nature Based Solutions, maintain ecological networks and build resilience to climate change. The ES should also incorporate the policies as set out in NPS EN-1 relating to climate change. The NPPF also requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 187(d)), which should be demonstrated through the ES.

16. Landscape

Nationally protected landscapes

16.1 The development site is not within or likely to impact on any nationally protected landscapes.

Landscape and visual impacts

16.2 The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

16.3 Whilst Natural England will not usually make comments on local landscape impacts, the EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

16.4 A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013 (*(3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and National Landscapes, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

16.5 The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

16.6 To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

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NG24 1BY

www.newark-sherwooddc.gov.uk

Sent by email to kilnsideenergypark@planninginspectorate.gov.uk

Telephone: [redacted]
Email: [redacted]@newark-sherwooddc.gov.uk

Our ref: 25/01035/NPA
Your ref: EN0110022

27 June 2025

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Kilnside Energy Park Limited (the applicant) for an Order granting Development Consent for the Kilnside Energy Park (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Thank you for the Regulations 10 and 11 letter dated 23 June 2025. Please note that any future correspondence relating to this Development Consent Order should be directed to Planning@newark-sherwooddc.gov.uk.

The site is located approximately 35km (as the crow flies) from the boundary line with the Newark and Sherwood District Council (NSDC).

Under the current EIA Regulations it is considered by Newark and Sherwood District Council, that we do not comply with the definition of a Consultation Body under S42(1)(a)(b) and S43 of the Planning Act 2008. None of the land to which the development relates is located within the District Authority Area of NSDC or does it adjoin. However, if our interpretation is incorrect then please accept these comments as our submission.

Having considered the EIA Scoping report submitted by the Applicant, we do not wish to add any further information on its acceptability. There are no developments within the scoping area which would be directly relevant to the consideration or indeed there are no environmental factors within our District i.e. heritage, landscape, which we feel would need to be scoped in the submission.

Newark and Sherwood would like to bring to the Examining Authorities attention the consideration of cumulative impact of schemes such as this on an area and the duty to consider this within the Planning Practice Guidance (Paragraph: 007 Reference ID: 5-007-20140306). Cumulative effects assessment and the requirement for such is set out in the Environmental Impact Assessment Directive and the assessment of the effects of certain public and private projects on the environment. The need to consider cumulative effects in planning and decision making is also set out in planning policy, particularly the National Policy Statements. The overarching National Policy Statement for energy (EN-1), for example, specifies a range of aspects for which the applicant's assessment in the Environmental Statement should consider cumulative impacts, as relevant to the development. Paragraph 4.1.5 of EN-1 states that the Secretary of State should take any long-term and cumulative adverse impacts, along with any measures to mitigate or compensate for adverse impacts, when weighing the adverse effects of a project against its benefits. National Policy Statements for other types of infrastructure also set out sector specific requirements for cumulative assessment[1]. A Cumulative Effects information has been submitted with the Scoping Report (Section 17) and it is suggested by Newark and Sherwood, that its suitability against National Policy and any subsequent document on this matter, should be taken into consideration as the Examination moves forward.

At this stage we have no further comments to make.

Yours faithfully

[redacted]

Lynsey Preston MSc MRTPI
Senior Planner
Planning Development

[1] Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment - GOV.UK Last accessed 30.05.2025

From: NSIPs
To: Kilnside Energy Park
Cc: [redacted]
Subject: RE: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification
Date: 15 July 2025 11:35:44
Attachments: image001.png
image003.png

Good morning,

Thank you for consulting Norfolk County Council on the scoping opinion for the above project.

Give the location of the development, I can confirm that Norfolk County Council do not have any comments to make on this project.

Best wishes,

Alice

Alice Craske
Project Manager Nationally Significant Infrastructure Projects
Growth and Investment
Strategy and Transformation
County Hall, Norwich, NR1 2DH

Campaign Logo

From: Kilnside Energy Park
Sent: 23 June 2025 11:03
To: Planning Services ; NSIPs
Cc: Kilnside Energy Park
Subject: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification

FAO Head of Planning

Dear Sir/Madam,

Please see attached correspondence on the proposed **Kilnside Energy Park.**

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **21 July 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

From: [redacted]
To: Kilnside Energy Park
Subject: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification (NKDC reference 25/0740/NSIP)
Date: 23 June 2025 17:39:04
Attachments: image451110.png
image141252.png
image536147.png
image244244.png
image319008.png
image832341.jpg

Dear Sir, Madam

Thank you for consulting North Kesteven District Council in relation to the above proposals. At this stage our only comment is to note that the 10km cumulative assessment ZOI for other NSIP projects, as set out at paragraph 17.3.4.4 and as contained in Table 17-2: 'Initial Long list search criteria', is not sufficient in our opinion. Other NSIP projects, including the solar NSIP projects proposed within North Kesteven District, have consistently adopted larger search areas including at a county-wide scale in the assessment of impacts on Best and Most Versatile (BMV) agricultural land. We would recommend that the ZOI is extended on this basis - as a minimum in the consideration of Chapter 15 'Agriculture and Soils' - and that all registered/consented NSIP-scale solar parks within North Kesteven District (Heckington Fen solar park, Beacon Fen solar park, Springwell solar park, Fosse Green solar park and Leoda Leadenham solar park) are taken account of in that cumulative assessment.

I hope that this feedback is of assistance,

Regards

Nick Feltham

Nick Feltham
Development Manager

Tel: [redacted]
Email: [redacted]@N-KESTEVEN.GOV.UK
www.n-kesteven.gov.uk
Kesteven Street,Sleaford,NG34 7EF

Officer: Matthew Gillyon

Tel: [redacted]

Email: [redacted]@northlincs.gov.uk

North Lincolnshire Council

www.northlincs.gov.uk

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16/07/2025

Aaron Jackson
1st Floor
14 Wigmore Street,
London,
W1U 2RE

Planning Inspectorate Number: EN0110022

North Lincolnshire Planning Application Reference: CON/2025/789

Kilnside Energy Park

Scoping Consultation

Officer: Matthew Gillyon

Thank you for your email dated 23rd June 2025 giving North Lincolnshire Council (NLC) the opportunity to comment on the scoping consultation for Kilnside Energy Park.

I can confirm that after consultation with our internal technical consultees that North Lincolnshire Council has no comments or objections to raise in respect of this project with the proposed development not likely to result in any significant impact upon North Lincolnshire.

Kind Regards

[redacted]

Matthew Gillyon
Senior Planning Officer
North Lincolnshire Council

Rutland County Council
Catmose
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LE15 6HP

telephone: 01572 722 577
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Gary Chapman
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Reference: 2025/0751/ADJ

Date: 21 July 2025

Dear Sir/Madam

Site Address: Kilnside Energy Park, Rutland

Proposal:EN0110022 - Environmental Impact Assessment (EIA) Scoping Opinion being issued to the Planning Inspectorate. Consultation and Regulation 11 Notification, comments to be submitted by 21 July 2025.

Thank you for your email received on 23 June 2025 seeking comments on the Scoping Report produced by Ove Arup & Partners Limited on behalf of Kilnside Energy Park Limited in connection with the above proposal.

The Council has reviewed the information contained with the EIA Scoping Report and offers the following comments which we request the Inspectorate considers in preparation of its final opinion.

Comments on topics scoped into the ES

Section 5 - Environmental Impact Assessment Methodology	The Inspectorate will need to satisfy themselves that the methodology set out in Section 5 of the Scoping report complies with best practice guidance and legislation. In general, Rutland County Council (RCC) has no comments to make on this section.
Section 6 – Climate Change Resilience	The Council respectfully urges the Inspectorate to give close consideration to this section of the Scoping Report, given that several topics have been scoped out

	of the Environmental Impact Assessment which, in the Council's view, may warrant inclusion within the Environmental Statement. These areas potentially raise environmental concerns that should be assessed to ensure a robust and comprehensive evaluation of the proposed development.
Section 7 - Greenhouse Gases	No comments
Section 8 - Cultural Heritage	8.4.3.4 – Any proposed programme of pre-determination trial trenching should be subject to prior consultation with the Council's Archaeological Advisor (Leicestershire County Council) to ensure appropriate methodologies are applied and that the most sensitive archaeological areas are comprehensively assessed as part of the Environmental Impact Assessment process. The Council notes that several designated Conservation Areas namely Clipsham, Stretton, Greetham, Empingham, and Ryhall are located on or just beyond the defined 2km study area. In light of the scale and nature of the proposed development, including both the solar array and associated cable routes, the Council considers that these Conservation Areas may be subject to adverse impacts on their setting. It is therefore recommended that these areas be included within the Environmental Impact Assessment, alongside those already identified, to ensure comprehensive consideration of potential effects on their significance and character. This is also relevant in relation to Section 11 on landscape and visual amenity. The Council requests that careful consideration be given to the justification for scoping out certain elements within the Cultural Heritage section of the Environmental Statement. It is noted that some aspects have been excluded on the basis that their impacts are considered short-term or limited to the construction phase. However, while the construction period may span approximately 24 months, the proposed development is expected to be operational for up to 60

	years. The potential cumulative and long-term effects on heritage assets arising from both direct and indirect impacts throughout the full lifecycle of the project should not be underestimated. Accordingly, the Council considers that these elements warrant inclusion within the scope of the Environmental Impact Assessment to ensure a robust and comprehensive assessment of cultural heritage impacts. In addition to the above, the Council has received representations indicating that the proposed development may be situated on or near the site of the historic Battle of Losecoat Field (also referred to as the Battle of Empingham). Ordnance Survey maps identify this location, and it has been suggested that the battlefield may have extended across a wider area—from Exeter Gorse to Bloody Oaks—encompassing both sides of the A1. The Council requests that the potential historical and archaeological significance of this area be considered and assessed as part of the Environmental Statement.
Section 9 - Ecology and Biodiversity	No comments to make at this stage other than to advise the applicants to contact Leicestershire County Council's Ecology Team as they will be able to provide valuable local knowledge which should be taken into consideration when developing the ES. Please see comments from Leicestershire County Council attached.
Section 10 - Water Environment and Flood Risk	The Council considers that Flood Risk and Drainage represent critical components of the environmental assessment for this development. While it is noted that a standalone Flood Risk Assessment (FRA) is proposed as an appendix to the Environmental Statement (ES), the Council would have expected these matters to be addressed within the main body of the ES to ensure appropriate integration and transparency. The Inspectorate is therefore requested to carefully consider whether the proposed approach provides sufficient assurance that flood risk and drainage issues will be

	robustly assessed and appropriately mitigated within the overall EIA framework. Please also see the attached comments from the Lead Local Flood Authority.
Section 11 - Landscape and Visual Amenity	11.5.1.34 - Rutland County Council (RCC) has not yet agreed the proposed viewpoint locations for the LVIA. RCC expects to be actively engaged in the selection process and to agree the precise location of viewpoints prior to submission of any formal application. This will ensure the assessment reflects representative views of key receptors and is consistent with local planning considerations. It is noted that the applicants have indicated that viewpoints will be agreed with the LPA. The Local Planning Authority (LPA) advises that the Environmental Statement should assess the potential visual impacts of the proposed development on the following nearby settlements: Great Casterton, Little Casterton, Tickencote, Empingham, Exton, Greetham, Stretton, Clipsham, Holywell, Pickworth, Essendine, and Ryhall. Particular attention should be given to potential cumulative landscape and visual impacts in relation to the Mallard Pass Solar Farm, to ensure a robust assessment of combined effects on local receptors.
Section 12 – Noise and Vibration	Precise details of any noise monitoring locations should be agreed with the LPA and these should also include monitoring locations along construction traffic routes. Noise from traffic during the decommissioning stage has been scoped out but given traffic volumes could be similar to during construction, this could also have significant effects, and it is considered that this should be scoped in.
Section 13 – Socio-Economics	It is requested that careful consideration is given to the areas proposed to be scoped out of this section. In particular it is considered that the potential impact on tourism is underestimated and that this should be scoped in.

Section 14 – Transport and Access	The comments from the Local Highway Authority are attached in full at the end of this letter. There comments should be taken into consideration as part of the scoping process. The LPA would also question the justification for scoping out the decommissioning phase of the development and would recommend that this should be scoped in.
Section 15 – Agriculture and Soils	This section should consider the wider cumulative impacts of the development and other known NSIP development and solar development in Rutland and the wider Lincolnshire area. There are a significant number of projects now proposed within Lincolnshire and Rutland and the cumulative impacts of these projects on the best and most versatile agricultural land should be assessed as part of any ES.
Section 16 – Other Environmental Topics	Air Quality In the absence of detailed information regarding HGV movements, the Council considers that an assessment of the impacts of construction traffic vehicle movements on air quality should be scoped into the ES to fully assess any impacts from projected HGV movements. It is proposed that certain topic areas, including assessments of Glint and Glare and Ground Conditions, be addressed through standalone technical appendices to the Environmental Statement (ES). The Inspectorate will therefore need to consider whether it would be appropriate for these assessments to be treated as separate documents appended to the ES, or alternatively, incorporated within the scope of the EIA and assessed as integral components of the main ES. The ES should contain dedicated sections addressing the potential risks associated with the battery storage component of the proposed development, along with clear and detailed descriptions of the mitigation measures to be implemented. This will be a key consideration in ensuring that the

	safety of the scheme is robustly assessed and communicated, and in providing necessary reassurance to the public and relevant stakeholders.
Section – Cumulative and in-combination effects	The submitted Local Plan identifies an extensive area of land at Woolfox, adjacent to the Kilnside solar farm proposal as a Future Opportunity Area in order to fully assess the potential for this site to contribute to future housing and employment requirements, in line with the transitional arrangements set out in paragraph 236 of the NPPF 2024. The landowner has appointed a master developer to take forward proposals for the site and it has also been submitted for consideration by the New Towns Commission. Given the significant increase in Rutland's Local Housing Need, the Council considers it is vitally important that the cumulative impact should include consideration of the Woolfox Future Opportunity Area. There are a number of minerals site within relatively close proximity to the site where dust and vehicle movements could result in cumulative impacts. The Council would expect any ES to consider these as part of any assessment. The sites include: Clipsham Greetham Hooby Lane Ketton Thistleston (currently dormant) Woolfox South Witham Little Casterton (currently dormant) Site North of Stretton Road. The Council would expect that the long list of developments to be considered for the cumulative impact assessment is agreed collaboratively with them prior to the formal submission of the Environmental Statement (ES). It is therefore urged that the Inspectorate require the applicant to undertake further discussions with the Council at an early stage, to ensure all relevant and major projects are

	appropriately identified and accounted for within the cumulative assessment.

I trust the above comments are of assistance.

Yours faithfully

Justin Johnson
Development Manager

RUTLAND COUNTY COUNCIL LLFA RESPONSE – EIA SCOPING REPORT: KILNSIDE ENERGY PARK

Rutland County Council as Lead Local Flood Authority (LLFA) welcomes the inclusion of flood risk and drainage matters within the EIA scope. We support the commitment to a Flood Risk Assessment (FRA) and drainage strategy and offer the following comments to guide the development of the Environmental Statement (ES).

POSITIVE ASPECTS

- The scoping report recognises that while the site is in Flood Zone 1, it may be affected by surface water and ordinary watercourse risks.
- The commitment to submitting an FRA and drainage strategy is welcomed.
- The need for a Construction Environmental Management Plan (CEMP) is acknowledged, which is important for managing runoff and pollution during works.

KEY MATTERS TO BE INCLUDED IN THE ENVIRONMENTAL STATEMENT

SURFACE WATER DRAINAGE STRATEGY

- The drainage strategy should follow the SuDS hierarchy and include infiltration testing or justification where ruled out.
- It should demonstrate discharge at greenfield runoff rates and provide indicative layout and location of SuDS features such as swales, attenuation basins and filter strips.
- The strategy should align with Defra's updated Non-Statutory Technical Standards for SuDS (June 2025), which place greater emphasis on multifunctional SuDS delivering benefits for water quantity, quality, biodiversity and amenity.
- The approach should reflect whole-lifecycle thinking and integrate SuDS into site design from the outset.

SURFACE WATER FLOOD RISK AND FLOW PATHS

- The FRA should map existing and post-development overland flow routes using updated surface water flood mapping and site-specific topography.
- Infrastructure such as solar arrays, access roads and compounds should be assessed for potential to intercept or redirect flows.

CONSTRUCTION PHASE WATER MANAGEMENT

- The ES should outline how runoff, soil erosion and silt pollution will be managed during construction, including temporary SuDS, silt control and stockpile management.
- A phased approach should be considered for large or sensitive areas.

MAINTENANCE AND ADOPTION

- The ES should confirm who will be responsible for SuDS maintenance during the lifetime of the development.
- Arrangements for access, funding and transfer of ownership (if relevant) should be addressed.

DECOMMISSIONING

- The ES should consider how surface water will be managed during decommissioning.
- This includes runoff control during removal of structures, restoration of ground, and treatment of any retained SuDS.
- Proposals should clarify whether drainage infrastructure will be removed, adapted or left in place, and who will be responsible after decommissioning.

SUMMARY

We welcome the inclusion of drainage and flood risk in the EIA scope. The Environmental Statement should include a robust, multifunctional SuDS strategy aligned with the June 2025 national standards and provide sufficient detail to support LLFA review at DCO stage. Early engagement with the LLFA is recommended to ensure local expectations are met.

Local Highway Authority - 2025/0751/ADJ – comments dated 17/07/2025

The application is a EIA scoping opinion on the consultation for Kilnside Energy Park for the installation of a new solar farm and on site energy storage facility for a period of 60 years.

LHA comments:

Paragraph No	Paragraph text	RCC Highways comments
2.1.2.5	The A1 (Great North Road), which forms part of the Strategic Road Network (SRN) bisects and borders the Solar Development Site. A number of roads including Pickworth Road and a number of unnamed roads also cross the Solar Development Site.	Noted, it would be useful to know which roads will be affected in each County. Further comments below give details of access requirements and improvements to road network in terms of passing places.
2.2.11.1	Operational access to the Proposed Development (Solar Development Site) is expected to be from rural roads off the A1 (Great North Road) and surrounding the Site. At this preliminary stage, it is anticipated that there will be a number of points of access required during the operational stage, including dedicated emergency accesses into the Solar Development Site. There will be ongoing engagement with the relevant highway authorities in respect of Site access.	Details will need to be provided for review. Noted that the applicant will engage with the LHA on their requirements. Generic access details provided, however site specific requirement will only be evident upon discussion with the LHA.
2.5.3.1	Site access optioneering is ongoing and will be subject to discussions with the relevant highway authorities. It is currently anticipated that a minimum of three points of vehicular access for the Solar Development Site will be required during the construction and decommissioning of the Proposed Development.	Noted, generic access details provided below, site specific requirements will be considered when the applicant contacts the LHA for discussion. The applicant should ensure that detailed drawings are provided that include dimensions and auto track plans to justify access requirements.

	Improvement works (such as widening of passing points) may be required subject to ongoing studies. Internal haul routes within the Solar Development Site will be used, as far as reasonably practicable, for movements to reduce disruption and transport effects.	
2.5.5.1	It is anticipated that there will be a maximum of 60 HGV trips per day (120 two-way movements) during peak construction periods, distributed across the network and access points around the Site. It is anticipated that AIL would be required to enable construction of the On-Site Substation(s).	It's noted reading through the document that construction hours will be 07:00- 19:00 with no deliveries between the AM and PM peek hour. 120 two-way HVG movements across a 10-hour period(12hrs minus 2 for peek hours) equates to 12 HGVs every hour, or 1 vehicle every 5 minutes. In addition to the above, these deliveries will be split across the 3 access points. The principle is therefore acceptable to the LHA subject to the routing plans, carriageway widths for delivery vehicles and pre-commencement surveys etc being provided for review.
2.5.5.2	As far as reasonably practicable, construction deliveries will be coordinated to avoid HGV movements during the traditional AM peak hour (08:00-09:00) and PM peak hour (17:00-18:00). Construction access and routing is subject to ongoing assessment; however, as noted in Section 2.4: Environmental Design, the Applicant will explore construction HGV route options with an aspiration to avoid sensitive receptors (e.g.	Noted, HGV movements though Great Casterton should be avoided. Routing plans should be agreed with the LHA.

	local schools) where feasible including seeking to minimise construction HGV movements through Great Casterton.	
2.5.5.3	A Construction Traffic Management Plan (CTMP) will be produced which will set out the traffic management measures to be implemented during construction. The CTMP would be submitted to and approved by the relevant local planning authority prior to commencement. An Outline CTMP (oCTMP) will accompany the Application.	As part of this process the applicant will need to ensure that the road network is video surveyed prior to the start of construction and then carried out post construction. Any issues caused or defects will then need to be rectified at their cost. RCC would want to see surveys carried out from the major road network(A1) to each of the site access points within Rutland.
14.4.1.2	A separate Transport Assessment (TA) will be prepared in relation to the Proposed Development which will set out the overarching transport strategy and consider impacts on the operation of local and strategic transport networks, including any key junctions identified through scoping discussions with National Highways and RCC and LCC as the relevant local highway authorities during the AM and PM peak hours.	Noted, the TA will need to be reviewed by RCC Transport assessment team. This will influence if any upgrades are required to junctions or access points etc.
Table 14-2	Road Safety Audits	Road Safety Audits should be carried out at any site within the Highway network where changes are being made to the line or level of the highway in line with GG119. Early engagement should be made with the LHA to discuss the process to ensure that the Audit brief and Audit team is approved prior to the audit being carried out.
14.5.2.1	There are three junctions on the A1 in the vicinity of the Solar Development Site, including a	It should be noted that there is an application in with RCC currently for the off slip at Woolfox. 2025/0130/OUT

	southbound off-slip at Woolfox, a grade separated junction with Grantham Lane, which in combination with the southbound off-slip provides for all movements, and a southbound off-slip and northbound on-slip to the B1081 at Great Casterton	This application seeks to amend the access to the industrial area and is proposed to provide a new roundabout within Rutland. Whilst not currently approved via planning it's likely to be approved shortly and therefore the applicant may want to consider this in their scoping document as committed development as it could have an impact on their application in terms of construction routes or the construction of the roundabout.
14.6.2.1	it is currently estimated that there will be a peak of approximately 350 personnel per day employed with an average of around 150-200 workers. Whilst some employees originating from larger settlements nearby (e.g. Stamford) may travel by public transport or cycle, these modes are not expected to constitute a significant proportion of trips to the Site.	Noted from other paragraphs that it will be encouraged that workers lift share and bus shuttles will be proposed. The applicant will need to clarify trip rates within the TA and how they will be split across the 3 accesses. This will need to be considered by Rutland Transport assessment team when the TA is submitted.
14.6.2.5	The operation of the Proposed Development is likely to involve a small number of staff for routine maintenance and security, occasional deliveries for replacement of parts/ equipment, and occasional visitors. It is currently anticipated that minimal visits to Site per week may occur with four-wheel drive vehicles or medium/ large sized vans at peak periods. Therefore, the anticipated number of vehicles associated with routine operations is low.	Noted, this is the norm for the operation phase of the development and therefore accept able to the LHA.
14.6.3.1	As described in Section 2.2:	Noted, all accesses will be

	Description of the Proposed Development, site access optioneering is ongoing. It is currently anticipated that a minimum of three points of vehicular access for the Solar Development Site will be required during the construction and decommissioning of the Proposed Development. Internal haul routes within the Solar Development Site will be used, as far as reasonably practicable for movements to reduce disruption and transport effects. At this preliminary stage, it is anticipated that there will be a number of points of access required during the operational stage, including dedicated emergency accesses into the Solar Development Site.	required to be constructed as formal access points during the construction period. All accesses will need to be suitable for two-way vehicle flow for the largest vehicle to attend the site. Vehicle to vehicle visibility splays will need to be provided commensurate with the posted speed limit and have no obstruction over 0.6m, drawn to mee the nearside kerb edge. If this can't be achieved, then 85%ile speed survey data should be provided at each site in accordance with the details set out in CA 185. Vehicle to vehicle visibility splays should then be provided to accord with the 85%ile speed data. All accesses will need to be sealed and drained away from the highway for a minimum distance of 20m from the edge of the public highway boundary. Kerb radii will need to be provided for all accesses; these will need to be detailed in accordance with tracking details to be provided for review. The access points will be subject to separate S278 agreements. If the access points are to be used for the decommissioning of the site, then they will be required to remain until the decommissioning of the site occurs, at which time they will need to be removed and a separate S278 agreement entered into to facilitate.
14.7.1.3	Embedded measures for the	This point is difficult to

	Proposed Development relevant to transport and access are likely to include, where such measures are required to mitigate potentially significant effects: • upgrading of routes where considered necessary to cater for HGV;	assess given that the applicant hasn't indicated how or where they are going to access the site. Routes should be suitable to pass two-way vehicle flow for the largest vehicle. If single track, then a number of passing places will be required to accommodate the passing of two of the largest vehicles driven to site. Bays should be a suitable width and length to accommodate the passing of these vehicle types. Tracking plans should be provided to support the proposal. These bays will need to be located prior to or at bends in the road, and equally set distances along straight sections of the carriageway. Suitable numbers of bays and locations will need to be identified by the applicant in consultation with the LHA. All bays should be located within available highway width, highway record plans can be obtained by contacting Highways@rutland.gov.uk. These passing places will be subject to separate S278 agreements per route. The LHA will negotiate with the applicant if any passing bays can/need to be removed post decommissioning of the site.
14.8.1.8	Construction HGV routing would be designed to use the SRN, A and B roads and avoid the rural routes and villages as far as reasonably practicable. However, traffic	Noted, specific routes will need to be agreed with the LHA prior to commencement so that suitable mitigation can be agreed and pre-commencement surveys

	flow increases relating to the construction of the Proposed Development on specific road links have not yet been determined, therefore this is Scoped In for further assessment at this stage and will be reported in the ES.	can be carried out by the applicant.
14.8.1.13	A Road Safety Audit would be carried out for any proposed changes to the adopted highway where appropriate prior to submission. This will be considered in the TA as appropriate and reported as an Appendix of the ES.	The applicant ensure that Road Safety Audit be carried out at any site within the Highway network where changes are being made to the line or level of the proposed highway network in line with GG119. Early engagement should be made with the LHA to discuss the process to ensure that the Audit brief and Audit team is approved prior to the audit being carried out.

Leicestershire County Council

CONSULTATION TEMPLATE RESPONSE FROM LEICESTERSHIRE COUNTY COUNCIL:

ECOLOGY AND BIODIVERSITY PRE-APPLICATION ADVICE

Please be aware that this advice is provided prior to the submission of a planning application and any associated ecological and protected species survey information.

Advice regarding likely ecological impacts has been provided in this limited context. In some circumstances, where information submitted to support a planning application identifies further ecological constraints, this advice may either change or include additional recommendations.

COUNTY, DISTRICT OR BOROUGH	Rutland
APPLICATION NUMBER	2025/0751/ADJ
ADDRESS	Kilnside Energy Park
DESCRIPTION OF DEVELOPMENT	EN0110022 - Environmental Impact Assessment (EIA) Scoping Opinion being issued to the Planning Inspectorate. Consultation and Regulation 11 Notification, comments to be submitted by 21 July 2025.
PLANNING CASE OFFICER	
DEPARTMENT	Ecology
PLANNING ECOLOGY OFFICER	Michael McCoy
DATE OF COMMENTS	17/07/2025

ADVICE SUMMARY:	
Protected species potential impact	YES
Protected habitat potential impact	YES
Statutory BNG likely applicable	YES

EIA Scoping Opinion:

- We have reviewed the EIA scoping report and find this acceptable. The main potential impacts are identified with further surveys needed. Further surveys required should be completed before submitting application to LPA.
- It should be noted that there are multiple Local Wildlife Sites (LWS) on the site. Every effort should be made to avoid impacting these sites if possible. Justification may be needed to explain how the mitigation hierarchy was applied when considering design layout.
- It is noted in the EIA scoping report that while otters and water voles may not need further surveys on-site, further surveys will be required on the cable route due to watercourses/rivers present. White clawed crayfish surveys should also be scoped in when reviewing the grid cable route.
- Bat activity and transect surveys should also be completed.

BIODIVERSITY NET GAIN (BNG) specific advice:
• BNG will be required for this site with a full metric in excel format submitted to the LPA. The condition assessment sheets should also be provided along with a BNG report
AMENDMENTS RECOMMENDED:
• Ensure LWS within the site are avoided where possible, ensuring the mitigation hierarchy is applied.

Note for applicants: Please be aware that this advice is provided to the Local Planning Authority through a Service Level Agreement between the Local Planning Authority and Leicestershire County Council Ecology Team. Its purpose is to discharge the legal duties under The Local Authorities (Functions and Responsibilities) Regulations (2000), Regulations 4.

If you have any queries about the content, please correspond directly with the Planning Officer assigned to the planning application or discharge of condition application. We are unable to respond directly to applicant enquiries regarding the advice that we have provided to the determining authority.

The following legislation is used to assist in the assessment of planning applications:

Legislation source	Reference
NPPF Dec 2023	Paras 8, 180, 181, 185, 186, 187, 188
Environment Act 2021	Mandatory Net Gain Biodiversity Duty Local Nature Recovery Strategy
District or Borough Local Plan and supporting SPD's	Local Plan policy reference:
ODPM circular 06/2005: Biodiversity and Geological Conservation	Requirement for species survey work and mitigation recommendations to be carried out prior to the determination of a planning application. Paras. 98 and 99
NERC Act 2006	Biodiversity Duty (see also Environment Act 2021) Section 41, habitats and species of Principal Importance (previously BAP)
Various International, European and National laws in relation to the protection of species and habitats	International and national site protection: Ramsar sites (from Ramsar Convention), Habitat and Birds Directives (Natura 2000 sites include SAC's and SPA's), SSSI's, National Nature Reserves, Local Wildlife Sites, Local Nature Reserves. Habitats and Species protection: Habitat and Species Regulations (protected sites and species). Wildlife and Countryside Act 1981 (as amended including special Schedule 1), Natural England Standing Advice. Badger Act.

From: [redacted]
To: Kilnside Energy Park
Subject: Fwd: Fwd: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification
Date: 14 July 2025 14:16:06
Attachments: image002.png
image006.png
image003.png
image008.jpg
Kilnside Energy Park - Letter to stat cons Scoping & Reg 11 Notification....pdf
clerk.vcf

Ryhall Parish Council have concerns and concur with the issues raised collectively with neighbour parishes as set out below.

Cumulative impact on landscape character of Mallard Pass and Kilnside with all the associated infrastructure – solar PV, inverter stations, sub stations, battery storage compounds (see below map)

- Cumulative recreational amenity impact (see below map)

- 2 more substations on our doorstep AND consequently more solar farms will follow!

- Battery storage (BESS) – dangerous and a blight on the landscape. There could be hundreds of shipping containers 4.5m high; c1 MW = 1 container

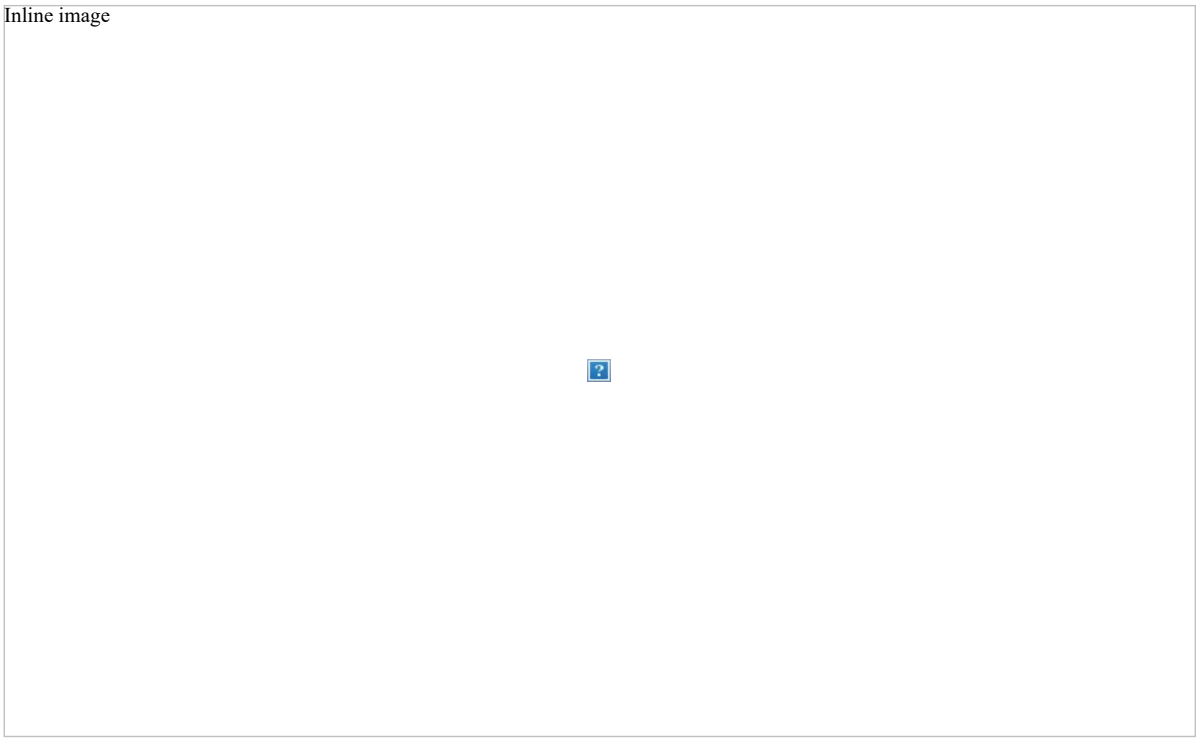
- Cable routings – if the substation is at the same location as the current Ryhall one, then there is all the cable routing disruption and destruction to consider.

Essential information about the scheme is not available in respect of substations, BESS, cabling route which means that nothing should be scoped out of the ES at this stage and any geographical areas for survey work and consultation should be extended not limited. There are too many unknowns with this scheme and the Planning Inspectorate needs to ensure Kilnside submit a 'full fat' ES with minmal 'scoping out' allowed..

Explanation:

Cumulative impact. Where Mallard Pass finishes on Holywell Road next to Newell Wood, Kilnside begins. It stretches from Great Casterton to Pickworth, up to Woolfox and across near to Exton Park. Whilst there are numerous solar NSIPs in Lincolnshire I am not aware of any that actually join up. This will completely destroy and industrialise the landscape in the wider local area. For the community there will be no respite from the impacts on their recreational amenity, there will be no place devoid of solar panels and associated infrastructure where they can walk, ride, cycle or just enjoy the beautiful countryside in that particular area.

Inline image



Grid connections: There are 2 substations required to process the energy generated from any solar farm.

1. National Grid (NG) substation at 400kV

AND

2. On-site substation for the each solar farm at 400/33kV.

How will it work for Mallard Pass?

1. The NG 400kV substation is already at Ryhall and Mallard Pass is using up all the remaining capacity there.

2. Mallard Pass are building their own on-site 400/33kV substation directly opposite the NG one at Ryhall.

How might it work for Kilnside?

1. There is no available capacity at any NG 400kV substation currently. There are *2 likely options*:

   Option 1:The key is having a substation directly next to a 400kV pylon route so it can easily connect. They seem likely to build a new one along the pylon route adjacent to Essendine Road/Uffington Lane OR extend onto the current 400kV Ryhall one. This is what is implied in the Grid Connection agreement on the TEC register (see later).

   Option 2: There is a new NG substation proposed to be built at Corby Glen as part of The Great Grid Upgrade which entails a 60km pylon route from Weston Marsh to East Leicestershire. According to NG at their consultation Kilnside is not on their radar, the predominant reason for this upgrade is to manage the off-shore wind energy generated along the east coast and bring it across to the Midlands. Any cabling route to Corby Glen from Kilnside site would be further away than Ryhall, so the developer would choose the cheapest option also resulting in the least amount of transmission losses, hence why option 1 is more likely.

2. The developer on-site substation (400/33kV) is likely to be located close to the 400kV NG one, when questioned Kilnside agreed with that in their webinar.

So that is 2 substations potentially in very close proximity to the Ryhall one.

Timing discrepancies for Kilnside

- NG has made a connection agreement with Kilnside (currently near current Ryhall substation) as per the **TEC register,** but this is for a connection on **31/10/2034**.

- Alternatively if Corby Glen is the chosen NG substation, that also won't go live until **2033.** NG are already massively behind on all their upgrades and new substations and timelines will extend.

Kilnside's planned go-live is **2031**. When challenged they said they were pushing for earlier connection with NG. I imagine they are looking for DCO consent before there is a general election AND they want to avoid the government's new Connections Reforms which will prioritise 'ready-to-go' clean power projects and kick out so-called 'zombie projects'. Is Kilnside a 'zombie project', should these timing disconnects and the ambiguity that comes with their current Scoping Request be challenged? They have no clear plan for key infrastructure of substations, BESS and cabling.

Battery Energy Storage System (BESS) for Kilnside. The current Ryhall substation does not have the ability to import and export energy, a key factor for flexibility and commercial viability, which is why Mallard Pass cannot currently offer battery storage. However any new NG 400kV substation for Kilnside would have that capability, hence why it is part of Kilnside's proposal. Mallard Pass may then finally be able to put in a retrospective LPA application for BESS.

Kilnside implied the battery storage would be close to their onsite substation which in turn would be close to any new NG 400kV substation – so potentially 3 major pieces of infrastructure close to the 2 substations Mallard Pass requires! The storage containers are 4.5m in height and there could be hundreds of them!

The risks of BESS to the environment and human health, if it becomes unstable, is horrendous by way of fire, explosion and lethal toxic gas. Lithium Ion batteries are notoriously unstable, at scale it is terrifying how dangerous and environmentally damaging they can be. There is evidence all over the world of the effects of BESS fires and explosions, I won't give the evidence today but can do so if required. As BESS on a 'utility scale' is a new concept in the UK, the government is playing catch up on safety regulations, they are a long way off from providing a satisfactory regulatory framework so developers exploit all loopholes available. We do not want BESS (lithium ion batteries) anywhere vaguely near any villages or rural residents.

More solar farms other than Kilnside on the horizon

Wherever there is a new 400kV NG substation there are likely to be more solar farms wanting to connect in, whether near the Ryhall one or near the new pylon route with the new NG substation at Corby Glen. Checking the TEC register for grid connection agreements it is not just Kilnside that appears for Ryhall/Casewick:

- Great Casterton Energy Park Ltd, renamed Kilnside Energy Park (solar & BESS) at Ryhall 400kV substation, 400MW connecting 31/10/34; ref PRO-004379

- 548 UK Investment Holdings Ltd. Ryhall Farm (solar & BESS) at Casewick 400kV substation, 200MW connecting 31/10/34; ref PRO-002684

- Greentech Projects Holdings Ltd. Graeme Road (solar & BESS) at Ryhall 400kV substation, 550MW connecting 30/10/38; ref PRO-004375

So if we don't put our efforts in to stop Kilnside which looks likely to impact the existing Mallard Pass site area, there will be/already are more even utility-scale solar farms heading our way.

Size and duration of Kilnside

950Ha compared to 852Ha for Mallard Pass, that excludes land required for cabling routing which will be considerably more extensive than Mallard Pass.

400MW AC vs 240MW AC for Mallard Pass – the comparable baseline is the *grid connection rating* which is measured in AC not DC.

60 years like Mallard Pass

Landowner support

YES, so CPO unlikely to be required other than for key infrastructure i.e. substation and BESS land. There will be an impact on tenant farmers who will lose the land they farm, they don't benefit from the c£1000 per acre the landowner receives. It is voluntary whether the developer compensates them in any way.

Consultation

There was no in-person non-statutory consultation (not a planning requirement although advisable). They just did 2 webinars (now in their resources library) and sent information to residents within 2km. As they don't know about the substations, BESS locations and cable routing yet, they have not sent out anything to residents within 2km of that infrastructure. They will have to do that at the statutory consultation in early 2026.

---------- Forwarded message ---------
From: **Kilnside Energy Park** <kilnsideenergypark@planninginspectorate.gov.uk>
Date: Mon, 23 Jun 2025 at 10:35
Subject: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification
Cc: Kilnside Energy Park <kilnsideenergypark@planninginspectorate.gov.uk>

Please see attached correspondence on the proposed **Kilnside Energy Park.**

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **21 July 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Gary Chapman (CEnv)

EIA and Land Rights Advisor (HEO)

The Planning Inspectorate

T: 0303 444 5051

www.gov.uk/pins

Ensuring fairness, openness and impartiality across all our services

DPC:76616c646f72

WONDERFUL ON TAP

SEVERN TRENT

Guidance for working near to Severn Trent assets.

Any planned work near to our assets could result in these assets being damaged. If such work involves any of the activities list below and is within 15m of our asset, the risk becomes even greater. If our assets fail this could also lead to the service to our customers being adversely affected, environmental impact such as flooding, damage to property, and even risk of injury to.

Any of the works listed below can present a significant potential impact on our assets. If any of the works listed below are planned, we need details of what is intended, and clarity as to how close work will take place to our assets. We may apply restrictions as to what work you will be allowed to undertake, and such work may to require a formal agreement.

- Construction of new buildings or alterations of existing
- Installation of underground utilities
- New or Improvements to highways
- Piling
- Significant temporary works
- Crane operation, piling rigs.
- Loading from other plant and machinery
- Deep excavations / Tunnelling
- Demolition
- Significant Dewatering

In general terms we require that your proposed works

- Do not have an adverse effect on the service level of the asset.
- Do not damage or otherwise adversely affect the asset.
- Do render the asset more difficult to maintain or repair.

This guidance applies to the permanent works and any temporary enabling works.

Statutory and Legal Obligations

It is an offense under S174(1) of the Water Industry Act to damage or interfere with a public asset, and this can result in a criminal conviction with fines being imposed.

CHAPTER II

PROTECTION OF UNDERTAKERS' WORKS, APPARATUS ETC.

Protection of apparatus in general

174. **Offences of interference with works etc.**

174.—(1) Subject to subsection (2) below, if any person without the consent of the water undertaker—

(a) intentionally or recklessly interferes with any resource main, water main or other pipe vested in any water undertaker or with any structure, installation or apparatus belonging to any water undertaker; or

(b) by any act or omission negligently interferes with any such main or other pipe or with any such structure, installation or apparatus so as to damage it or so as to have an effect on its use or operation,

that person shall be guilty of an offence and liable, on summary conviction, to a fine not exceeding level 3 on the standard scale.

Reference should also be made to:

- Health and Safety Guide No.47 (HSG47) which outlines the potential dangers of working near underground assets
- Drainage and Waste Disposal: Approved Document H Building Regulations

Your planned work

If work is planned near one of our assets our preferred option is for the asset to be diverted. If the proposed work involves the construction of a permanent structure, we may ask that its location be revised to accommodate our asset. However, if it is not possible to relocate the structure or divert our asset, we will consider allowing work to proceed. This will be subject to you providing an impact assessment, demonstrating the risk is as low as reasonably practicable (ALARP), and full details of the proposed works.

At our discretion, we may allow work to take place close to or even over a gravity sewer **(but never over a water or pressurised waste water main).** Any such approval to work close to our asset will be subject to the impact assessment, our technical approval, and may require a formal protection agreement.

Minimum Safe Working Distance from our assets

Small waste and water pipes (less than 300mm)	Minimum 3m
Waste rising mains	Minimum 4m
Large waste pipes (300mm to 1000m)	4m to 5m (depending on size and depth
Large water pipes (300mm to 1000mm)	Minimum 6m
All pipes greater than 1000mm	Bespoke widths for pipes greater than 1000mm, or at excessive depths.

Please note – never rely on asset record drawings when planning your work. It is your responsibility to locate and confirm the precise depth and location of any asset within your working area or any location that might be affected by your work

What you will need to do:

- Submit full details of your planned work for our consideration.
- Provide an impact assessment statement as described below.
- Verify the precise location of our asset on site and not rely solely on our asset records.
- Mark the location of the asset on the surface of the site and the required protective strip if necessary.
- Undertake Pre and Post surveys (CCTV, leakage, etc) to confirm no damage has been caused as a result of your works.
- Monitor vibration, ground movement etc, as applicable.
- Adhere to asset specific issues as applicable (to be found below).
- Enter into a Protection Agreement or give an undertaking of having understood and complied with our standard conditions.

Your impact assessment should include an assessment of the risks of your activity and a method statement outlining how the works will be carried out safely with due regard to the general public and our apparatus. It should also include proposals for monitoring vibrations, ground movements, strains etc. as appropriate to the activity and measures to be implemented in the event of damage or another emergency situation.

If you need further guidance, or to notify us of planned work please contact:

Asset.protection@severntrent.co.uk

For asset specific guidance please see the following:

Working Near Small Water Mains (<300mm)

We require detailed plans and the construction depths of the proposed works over Severn Trent Water's asset. Prior to work commencing we will require confirmation of the line and level of the water main in the location of the works through hand dug trial holes.

Please be aware of the following precautions, conditions and requirements in consideration of your planned works

- No building temporary or permanent permitted above the water main.
- Main and easement not to be located within the confines of property boundaries.
- 6 metre exclusion zone, 3 metre on either side of the main.
- Main to be located in green public open space or adoptable public highway, subject to review and STW agreement, construction constraints will also apply.
- No machine excavation within 1000mm of the pipe, subject to confirmation of location. Within 1000mm all excavation undertaken by hand.
- No excessive ground is to be removed from the surround of the pipe.
- No excessive ground is to be removed below crown of pipe, angle of repose to remain at 30° any works beyond this are prohibited. Further consultation will be required.
- No ground is to be removed surrounding bends or thrust blocks.
- At no point or time will the pipe be undermined.
- At no point will joints to the pipe be exposed.
- No heavy plant is to cross the main unless there is a designated crossing point.
- Where the pipe passes through the construction site, to be marked by a post and wire fence with hi-vis plastic netting 3 metre on either side of the pipe to prevent accidental movement of equipment near the pipe.
- Point loadings of plant and equipment are to be supplied.
- Details of protection measures to protect the asset to be supplied.
- Details of how the protection measures will be constructed and maintained.
- Detailed design and construction method statement taking into consideration everything detailed herein.
- No directional drilling.
- No piling and drilling within 6000mm of the pipe without approval. Vibration monitoring will be required as a result of any such undertaking.
- Contingency plans in the event that you do damage the pipe.
- Sequence of works.
- No other apparatus is to be laid within 300mm of our apparatus either above or below subject to review of your detailed plans and STW agreement.
- All service crossings to be laid at 90° and to be ducted.
- Storm and foul construction details to be supplied with applicable method of construction.
- No manholes / gullies permitted within 3 metres on either side of the pipe.

- Full details of any demolition proposed.
- Street lighting details to be provided.
- Full information on any earth /noise bunds.

Cautionary notes for your consideration:

- The contractor/company is to ensure he has adequate insurance in the event of consequential damage. STW will look to recover all associated costs thereof in the event of damage and loss.
- The Health and Safety pack for the site must have Severn Trent Water details within in the event of an emergency. 0800 783 4444
- Any designer or Architect designing works in the vicinity should ensure the above is accounted for and detailed accordingly.
- Every possible precaution should be taken to avoid damage to our apparatus. You or your contractor must ensure the safety of our equipment and will be responsible for the cost of repairing any damage caused.

Working Near Large Water Mains (300mm and above)

We require detailed plans and the construction depths of the proposed works over and surrounding Severn Trent Water's asset. Prior to work commencing we will require confirmation of the line and level of the water main in the location of the works through hand dug trial holes.

Please be aware of the following precautions, conditions and requirements in consideration of your planned works:

- No building temporary or permanent permitted above the water main.
- 12 metre exclusion zone 6 metre on either side of the pipe.
- Main and easement not to be located within the confines of property boundaries.
- Main to be located in green public open space or adoptable public highway, subject to review and STW agreement, construction constraints will also apply.
- No machine excavation within 1500mm of the pipe, subject to confirmation of location. Within 1500mm all excavation undertaken by hand.
- No excessive ground is to be removed from the surround of the pipe.
- No excessive ground is to be removed below crown of pipe, angle of repose to remain at 30° any works beyond this are prohibited. Further consultation will be required.
- No ground is to be removed surrounding bends or thrust blocks.
- At no point or time is the pipe to be undermined.
- At no point will joints to the pipe be exposed.
- No heavy plant is to cross the main unless there is a designated crossing point.
- Where the pipe passes through the construction site, to be marked by a post and wire fence with hi-vis plastic netting 6 metre either side of the pipe to prevent accidental movement of equipment near the pipe.
- No plant loadings to be applied unless protection is installed.
- Point loadings of plant and equipment are to be supplied.
- Details of protection measures you will put in place to protect the asset are to be supplied.
- Details of how the protection measures will be constructed and maintained will be required by STW prior to works commencing.
- Detailed design and construction method statement taking into consideration everything detailed herein.
- No directional drilling.
- No piling or drilling within 6000mm of the pipe without approval. Vibration monitoring will be required as a result of any such undertaking.
- Contingency plans in the event that the main is damaged.
- Sequence of works.
- No other apparatus is to be laid within 450mm of our apparatus either above or below - subject to review of your detailed plans and STW agreement.
- All service crossings are to be laid at 90° and ducted.

- Storm and foul construction details to be supplied with applicable method of construction.
- No manholes / gullies permitted within 3 metres on either side of the pipe.
- Details of any proposed demolition to be provided.
- Street lighting details to be provided.
- Full information on any earth /noise bunds.

Cautionary notes for your consideration:

- Approximate daily liability as a consequence of damage is £3 million, excluding any repair requirements and consequential damage to nearby properties and land.
- Flood risk from any damage is extremely high.
- Any contractor/company working in the immediate vicinity must ensure that they have adequate insurance in the event of an incident, minimum therefore of £10 million for one incident.
- The Health and Safety pack for the site must have Severn Trent Water details within in the event of an emergency. 0800 783 4444
- Any designer or Architect designing works in the vicinity should ensure the above is accounted for and detailed accordingly.
- Every possible precaution should be taken to avoid damage to our apparatus. You or your contractor must ensure the safety of our equipment and will be responsible for the cost of repairing any damage caused.

Working Near Aqueducts and other Critical Assets

Due to the highly critical nature such assets the following as a start is provided but may not be exhaustive:

We require detailed plans and the construction depths of the proposed works over and surrounding Severn Trent Water's asset. Prior to work commencing we will require confirmation of the line and level of the Aqueduct in the location of the works through hand dug trial holes.

Please be aware of the following precautions, conditions, and requirements in consideration of your planned works:

- No building temporary or permanent permitted above the Aqueduct.
- 12 metre exclusion zone, 6 metre on either side of the pipe.
- Aqueduct and easement not to be located within the confines of property boundaries.
- Aqueduct to be located in green public open space or adoptable public highway subject to review and STW agreement, construction constraints will also apply.
- No machine excavation within 6 metres of the pipe, subject to confirmation of location. Within 6 metre all excavation undertaken by hand.
- No excessive ground is to be removed from the surround of the pipe.
- No excessive ground is to be removed below crown of pipe, angle of repose to remain at 30° any works beyond this are prohibited. Further consultation will be required.
- At no point or time is the pipe to be undermined.
- At no point will joints to the pipe be exposed.
- No ground is to be removed surrounding bends or thrust blocks.
- No heavy plant is to cross the Aqueduct unless there is a designated crossing point.
- Where the Aqueduct passes through the construction site, the Aqueduct to be marked by a post and wire fence with hi-vis plastic netting 6 metre either side of the pipe to prevent accidental movement of equipment near the Aqueduct.
- No plant loadings to be applied unless protection is installed.
- Point loadings of plant and equipment are to be supplied.
- Details of protection measures you will put in place to protect the asset are to be supplied.
- Details of how the protection measures will be constructed and maintained will be required by STW prior to works commencing.
- Detailed design and construction method statement taking into consideration everything detailed herein.
- No directional drilling.
- No piling or drilling within 20 metre of the pipe without approval - subject to review of detailed plans, vibration monitoring will be required as a result of any such undertaking.

- Contingency plans in the event that the Aqueduct is damaged.
- Details on the proposed access route.
- Sequence of works.
- No other apparatus is to be laid within 600mm of our apparatus either above or below - subject to review of your detailed plans and STW agreement.
- All service crossings are to be laid at 90° and ducted.
- Storm and foul construction details to be supplied with applicable method of construction.
- No manholes / gullies permitted within minimum 3 metre on either side of the pipe.
- Details of any proposed demolition to be provided.
- Street lighting details to be provided.
- Information on any proposed noise or earth bunds required.

Cautionary notes for your consideration:

- Approximate daily liability as a consequence of damage is £3 million, excluding any repair requirements and consequential damage to nearby properties and land.
- Flood risk from any damage is extremely high.
- Any contractor/company working in the immediate vicinity must ensure that they have adequate insurance in the event of an incident, minimum therefore of £10 million for one incident.
- The Health and Safety pack for the site must have Severn Trent Water details within in the event of an emergency. 0800 783 4444
- Any designer or Architect designing works in the vicinity should ensure the above is accounted for and detailed accordingly.
- Every possible precaution should be taken to avoid damage to our apparatus. You or your contractor must ensure the safety of our equipment and will be responsible for the cost of repairing any damage caused.

On completion:

- Maintained access and egress to enable suitable plant and equipment to repair, renew or maintain the asset.
- Consideration given to height and width access.
- Consideration given to the working environment in the event of repair and maintenance.
- Handover and inspection.

Working Near Waste and Water Asset (general)

These general conditions and precautions apply to the public sewerage, water distribution and telemetry systems. The conditions include sewers which are the subject of an Agreement under Section 104 of the Water Industry Act 1991 and mains installed in accordance with the Agreement for the self-construction of water mains. Please be aware that due to The Private Sewers Transfer Regulations June 2011, the number of public sewers has increased, but many of these are not shown on the public sewer record. However, some idea of their positions may be obtained from the position of inspection covers and their existence must be anticipated.

In order to achieve safe working conditions adjacent to any apparatus the following should be observed:

1. All STW apparatus should be located by hand digging prior to the use of mechanical excavators.
2. All information set out in any plans received from us or given by our staff at the site of the works, about the position and depth of the mains, is approximate. Every possible precaution should be taken to avoid damage to our apparatus. You or your contractor must ensure the safety of our equipment and will be responsible for the cost of repairing any damage caused.
3. Water mains are normally laid at a depth of 900mm. No records are kept of customer service pipes which are normally laid at a depth of 750mm; but some idea of their positions may be obtained from the position of stop tap covers and their existence must be anticipated
4. During construction work, where heavy plant will cross the line of STW apparatus, specific crossing points must be agreed with the Company and suitably reinforced where required. These crossing points should be clearly marked and crossing of the line of STW apparatus at other locations must be prevented.
5. Where it is proposed to carry out piling or boring within 20 metres of any STW apparatus, STW should be consulted to enable any affected STW apparatus to be surveyed prior to the works commencing.
6. Where excavation of trenches adjacent to any STW apparatus affects its support, the STW apparatus must be supported to the satisfaction of STW. Water mains and some sewers are pressurised and can fail if excavation removes support to thrust blocks to bends and other fittings.
7. Where a trench is excavated crossing or parallel to the line of any STW apparatus, the backfill should be adequately compacted to prevent any settlement which could subsequently cause damage to the STW apparatus. In special cases, it may be necessary to provide permanent support to STW apparatus which has been exposed over a length of the excavation before backfilling and reinstatement is carried out. There should be no concrete backfill in contact with the STW apparatus.
8. No apparatus should be laid along the line of STW apparatus irrespective of clearance. Above ground apparatus must not be located within a minimum of 3 metres either side of the centre line of STW apparatus for smaller sized pipes and 6 metres either side for larger

sized pipes without prior approval. No manhole or chamber shall be built over or around any STW apparatus.
9. A minimum radial clearance of 300 millimetres should be allowed between any plant being installed and existing STW apparatus. - We reserve the right to increase this distance where strategic assets are affected.
10. Where any STW apparatus coated with a special wrapping is damaged, even to a minor extent, STW must be notified and the trench left open until the damage has been inspected and the necessary repairs have been carried out. In the case of any material damage to any STW apparatus causing leakage, weakening of the mechanical strength of the pipe or corrosion-protection damage, the necessary remedial work will be recharged.
11. It may be necessary to adjust the finished level of any surface boxes which may fall within your proposed construction. Please ensure that these are not damaged, buried or otherwise rendered inaccessible as a result of the works and that all stop taps, valves, hydrants, etc. remain accessible and operable.
Minor reduction in existing levels may result in conflict with apparatus such as valve spindles or tops of hydrants housed under the surface boxes. Checks should be made during site investigations to ascertain the level of such apparatus in order to determine any necessary alterations in advance of the works. 3 Guidance for working near our assets May 2014 [public] 12. With regard to any proposed resurfacing works, you are required to contact STW on the number given above to arrange a site inspection to establish the condition of any STW apparatus in the nature of surface boxes or manhole covers and frames affected by the works. STW will then advise on any measures to be taken, in the event of this a proportionate charge will be made.
13. You are advised that Severn Trent Water Limited will not agree to either the erection of posts, directly over or within 1.0 metre of valves and hydrants,

14. No explosives are to be used in the vicinity of any STW apparatus without prior consultation with STW.

You must not enter the public sewerage system without prior approval.

GENERAL CONDITIONS AND PRECAUTIONS TO BE TAKEN WHEN CARRYING OUT WORK ADJACENT TO SEVERN TRENT WATER'S APPARATUS

Please ensure that a copy of these conditions is passed to your representative and/or your Contractor on site. If any damage is caused to STW apparatus, the person, Contractor or Subcontractor responsible must inform STW immediately on:

0800 783 4444 (24 hours)

These general conditions and precautions apply to the public sewerage, water distribution and telemetry systems (including sewers which are the subject of an Agreement under Section 104 of the Water Industry Act 1991 and mains installed in accordance with the Agreement for the self-construction of water mains)(STW Apparatus) of Severn Trent Water (STW) and are not to be taken as exhaustive.

Piling and Drilling

- No piling and drilling within 6000mm of the pipe without approval.
  I. Driven piles shall be installed no closer than 15 metres from the pipe measured between the outside face of the pile and the outside face of the pipe.
  II. Bored or augered piles shall be at least three metres or 1.5 times the diameter of the pile, whichever is greater, from the pipe measured between the outside face of the pile and the outside face of the pipe.
  III. Piles adjacent to a pipe must be founded at a level not less than 1.5 m below the underside of it. Any frictional resistance of the pile above a line drawn upwards at 45 degrees from the underside of the pipe should be ignored when calculating the load carrying capacity of the pile.
  IV. All boring operations must be controlled to ensure that the minimum of vibration is transmitted to the apparatus. A peak particle velocity (PPV) of 15mm/s is the maximum that should be recorded at the face of the apparatus.
- Any peak above 15 mm/s works must cease and STW will need to be informed.
- Personnel on the ground must be aware of these figures.
- Equipment will need to be constantly monitored by personnel.
- Vibration levels that cause damage depend upon the peak particle velocity and the frequency at which it occurs. Damage to the main is likely where peak particle velocity is high when its frequency is low.
- Assuming a vibrographs sensor is being used, it is crucial that this is fixed (or coupled) properly to the structure being monitored. A suitable method of fixing we would accept would be bolting, gluing (using epoxy resin), or sandbagging.
- Site the equipment on or at the structure nearest to the vibration source (the piling rig, for example).
- The equipment must be level (within 10 degrees).
- If a sandbag is used it must be loosely filled and placed so that its sides touch the ground around the geophone pack, whilst ensuring that the geophone pack remains level.
- Never site the equipment on a paving slab, as this may independently move giving rise to higher readings than the adjacent structure is being subjected to.
- Prevent the monitoring equipment from being knocked or disturbed by objects, people or animals and thus giving false readings.

We appreciate that these are simple daily checks but:

If possible, remove the paper record or download the instrument after each day's monitoring session and ensure that it is safely stored or given to the relevant person (STW included). Ensure that levels have not been exceeded.

Ensure that the instrument is clean and dry before use and check the battery and charge if necessary.

Calibration

Please provide evidence of the equipment's calibration. **Until this is received works are not to proceed.**

PEAK PARTICLE VELOCITY - WHY DO WE MONITOR IT?

With increasing activities in and around our cities the importance of vibration has become a prominent feature. You might have heard of PPV, but what exactly is it and how does that affect us and our projects?

VIBRATION (PPV) – ALL THE ANSWERS!

What is vibration and where does it come from?

Ground vibrations are associated with different types of elastic waves propagating through the ground. These are surface waves, and bulk longitudinal waves and transverse waves (or shear waves) propagating into the ground depth. Typical frequency range for environmental ground vibrations is 1 – 200 Hz. Waves of lower frequencies (below 1 Hz) are usually called microseisms, and they are normally associated with natural phenomenae, e.g., water waves in the oceans.

Ground vibration is measured in terms of Peak Particle Velocity (PPV) with units in mm/s or mm/s^{-1}. It should be noted that the PPV refers to the movement within the ground of molecular particles and not surface movement. The displacement value in mm refers to the movement of particles at the surface (surface movement).

Environmental ground vibrations generated by rail and road traffic may cause annoyance to residents of nearby buildings both directly and via generated structure-borne interior noise. Very strong ground vibrations, e.g. generated by heavy lorries on bumped roads, may even cause structural damage to very close buildings. Typical values of ground vibration particle velocity associated with vehicles passing over traffic calming road humps are in the range of 0.1 – 2 mm/s.

The main sources of ground vibrations at construction are pile driving, dynamic compaction, blasting, and operation of heavy construction equipment. These vibrations may harmfully affect surrounding buildings, and their effect ranges from disturbance of residents to visible structural damage.

Why do we monitor and what are the limits?

Ground vibration can cause serious structural damage but can also be a nuisance to local residents. There are clear limits mentioned for vibration due to

construction/demolition in BS 5228-2. In table B.1 - page 36 of BS 5228-2 you will find the guidance on effects of vibration levels. These levels set out the human response to vibration, as in nuisance. When we look at potential damage to buildings table B.2 comes into place. Depending on the type of building there are different limits which are generally higher than the nuisance limits. In general, magnitudes of ground vibrations that are considered to be able to cause structural damage to buildings are above 15 mm/s.

Every ground vibration can be recorded and measured automatically. Since it is simple for everyone to protect people, buildings, infrastructure, soil, air and watercourses from negative environmental impact these days we see more and more demand for continuous automated monitoring so construction & demolition can move forward and communities can be developed with minimal disturbance.

To minimize the impact of vibration caused by construction & demolition works governing bodies often set limits that are aimed to protect individuals from levels likely to cause nuisance and potential cosmetic damage to buildings. You will often see limits of 10 mm/s which is a level likely to cause complaints and is close to the level of potential cosmetic damage in lightweight structures. Amber alerts can also be sent at lower levels to give warning that vibration levels are getting closer to the limits.

It is also useful to store a waveform (very detailed data) when high vibration levels are recorded. This enables you to investigate the actual frequency content of the vibration event. BS 5228-2, table B.2 gives separate limits by frequency which can therefore be accurately assessed.

The standard gives guidance for underground services of 15mm/s for transient and 30 mm/s for continuous vibrations.

Please note that the levels in the tables below are for guidance. You will see separate guidance/ limits on vibration close to historic buildings, utilities infrastructure and sensitive measurement equipment found in universities and hospitals.

Table B.1 **Guidance on effects of vibration levels**

Vibration level	Effect
0.14 $mm \cdot s^{-1}$	Vibration might be just perceptible in the most sensitive situations for most vibration frequences associated with construction. At lower frequencies, people are less sensitive to vibration.
0.3 $mm \cdot s^{-1}$	Vibration might be just perceptible in residential environments.
1.0 $mm \cdot s^{-1}$	It is likely that vibration of this level in residential environments will cause complaint, but can be tolerated if prior warning and explanation has been given to residents.
10 $mm \cdot s^{-1}$	Vibration is likely to be intolerable for any more than a very brief exposure to this level.

Table B.2 **Transient vibration guide values for cosmetic damage**

Line (see Figure B.1)	Type of building	Peak component particle velocity in frequency range of predominant pulse	
		4 Hz to 15 Hz	15 Hz and above
1	Reinforced or framed structures Industrial and heavy commercial buildings	50 mm/s at 4 Hz and above	50 mm/s at 4 Hz and above
2	Unreinforced or light framed structures Residential or light commercial buildings	15 mm/s at 4 Hz increasing to 20 mm/s at 15 Hz	20 mm/s at 15 Hz increasing to 50 mm/s at 40 Hz and above

NOTE 1 Values referred to are at the base of the building.

NOTE 2 For line 2, at frequencies below 4 Hz, a maximum displacement of 0.6 mm (zero to peak) is not to be exceeded.

Tree and plant distance requirements

When planting trees, shrubs and bushes on site, you need to think about how far the mature root systems and branch canopies will grow.

There are set safe distances for root systems and tree canopies. The distances are different for each species.

It's important to follow these distance requirements. They exist to protect our water and waste pipes.

Tree and plant species	Minimum distance from assets
Poplar and Willow	12 metres
Large for forest trees such as Oak, Ash, Beech, Sitka spruce, Douglas fir	10 metres
Medium sized trees such as Elm, Horse Chestnut, Lime, Oak, Sycamore, Apple, Pear and most Confiers	6 metres
Large shrubs such as Blackthorn, Broom, Cotoneaster, Elder, Hazel, Laurel, Privet, Quickthorn, Snowberry, and most ornamental flowering shrubs used for screening	2 metres
Soft fruit bushes such as blackcurrant, raspberries and gooseberries	Less than 1 metre, providing a path to the asset is kept clear

These measurements are only a guide. If you are unsure, speak to a specialist and discuss your plans with our Asset Protection team.

You should carry out detection surveys and dig trial holes to confirm the location of any assets before you plant any trees, bushes or shrubs.

We will charge you for any damage and repairs to our assets, caused by inappropriate planting.

From: Asset.Protection
To: Kilnside Energy Park; [redacted]
Subject: FW: RE: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification J-250623-26252
Date: 07 July 2025 11:25:16
Attachments: image001.jpg
Full AP Standard Guidance v27.02.25.pdf

ST Classification: UNMARKED

Now attached.
Kind regards
Anna Cheung
Asset Protection
Asset Strategy & Planning
Chief Engineer

image001

From: Asset.Protection
Sent: 07 July 2025 11:19
To: kilnsideenergypark@planninginspectorate.gov.uk; [redacted]@aukera.energy
Subject: RE: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification J-250623-26252

Good morning
We have no comment regarding the Environmental Statement for the project above.
However there appears to be Severn Trent Water mains within the development site.
Please note the following protective strips where no building will be permitted.

We do not allow building over of water mains;

WATER

Our records are a guide only, therefore you should carry out site investigation to confirm position, depth and size of water pipes (we require RAMS for this)

Please note the following protective strips where no building will be allowed.

- For water mains less than 300mm diameter Severn Trent requires a protective strip of 6m placed centrally over the pipe
- For water mains 300mm diameter and above Severn Trent requires a protective strip of 12m placed centrally over the pipe

Should you find the proposed work is within proximity to our assets, please consult with us.

Please see attached AP guidelines for reference.

Kind regards

Anna Cheung

Asset Protection

Asset Strategy & Planning

Chief Engineer

image001

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our Ref: S25/1299
Your Ref: EN0110022

14th July 2025

Dear Gary,

SCOPING OPINON REQUEST BY KILNSIDE ENERGY PARK LIMITED IN RELATION TO AN APPLICATION FOR AN ORDER GRANTING DEVELOPMENT CONSENT ORDER FOR THE KILNSIDE ENERGY PARK

Thank you for your letter dated 23rd June 2025 seeking South Kesteven District Council's (SKDC) views and comments on the Scoping Report produced by Ove Arup & Partners Limited on behalf of Kilnside Energy Park Limited and the content of the Environmental Statement for the above proposal.

In respect of the above project, it is noted that the proposed Solar Development Site is located wholly within the administrative area of Rutland County Council but extends to a point adjacent to the SKDC administrative area at the site's northern boundary. Furthermore, it is noted that identified Grid Cable Route Search Areas are all located wholly within the administrative area of SKDC.

Under Section 10(9) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the relevant authority must take into account any information provided about the proposed development, the specific characteristics of the development, the likely significant effects of the development on the environment; and in the case of a subsequent application, the environmental statement submitted with the original application.

SKDC has reviewed the information contained within the Scoping Report and offers the following comments which we request the Inspectorate considers in preparation of its final Opinion. The request is considered to comply with the requirements of Section 10(11) of the Regulations 2017.

Comments on the topics scoped into the ES

Climate Change Resilience	No comments to make.
Greenhouse Gases	No comments to make.

Adam Murray
Principal Development Management Planner
South Kesteven District Council
St Peter's Hill, Grantham
Lincolnshire NG31 6PZ

[redacted]**@southkesteven.gov.uk**
☎ [redacted]
www.southkesteven.gov.uk

SOUTH KESTEVEN DISTRICT COUNCIL

Cultural Heritage	• SKDC agrees this matter should be 'scoped in' and appropriate assessments included within the Environmental Statement. • SKDC does not agree with the proposed approach to assessing baseline conditions for archaeological impacts. In particular, the Scoping Opinion does not propose to undertake any trial trenching of the Grid Cable Route Area. However, the proposed development would retain the cables in situ following the decommissioning of the solar development site, and therefore, the impact of the cable connections would be permanent and as such, warrants assessment within the ES. • Lincolnshire County Council should be included in the list of consultees, as the appropriate Local Archaeological Advisors in this instance. • Stamford Conservation Area, and the listed buildings therein, should be added to the listed of designated heritage assets which will require consideration in respect of the impacts of construction activities in the grid cable search area.
Ecology and Biodiversity	• SKDC agrees this matter should be 'scoped in' and appropriate assessments included as part of the ES.
Water Environment and Flood Risk	• SKDC considers that there is currently insufficient information to determine the Flood Risk and Drainage can be scoped out of the ES. • It is considered likely to be reasonable to scope out Flood Risk and Drainage for the operational stage of the development. However, there is currently insufficient information in relation to the BESS, internal access roads, and hardstanding associated with the substations to conclude that the operational impact of the development wouldn't adversely impact on Flood Risk and Drainage. • However, SKDC considers that Flood Risk and Drainage should be 'scoped in' for the construction and decommissioning stages of the development. The construction of the solar development together with the associated impacts relating to the Grid Cable Route is likely to have an effect on the local drainage regime.

	• Relevant Internal Drainage Boards should be added to the list of consultees to agree any stand-off distances to board watercourses.
Landscape and Visual Amenity	• SKDC agrees this matter should be 'scoped in' and appropriate assessments included as part of the ES. • No details are provided on the proposed green infrastructure. SKDC would expect details of the green infrastructure to be included in the supporting ES. • The ES must consider battery storage and substation final layout in relation to the LVIA.
Noise and Vibration	• SKDC agrees this matter should be 'scoped in' and appropriate assessments included as part of the ES. • Noise monitoring of construction traffic routes should be carried out.
Socio-Economics	No comments to make.
Transport and Access	• SKDC agrees this matter should be 'scoped in' and appropriate assessments included as part of the ES. • It is considered likely to be reasonable to scope out operational road traffic effects, but no access routes have been identified in the Scoping Report. • It is unclear how decommissioning can be scoped out given that construction road traffic effects have been scoped in, and it is acknowledged that they are likely to have similar traffic volumes.
Agriculture and Soils	• SKDC agrees this matter should be 'scoped in' and appropriate assessments included as part of the ES. • The methodology for assessing agricultural land quality should be agreed with SKDC. • SKDC considers that the impact on the agricultural land resource and soil resource on the Grid Cable Route should also be assessed given the permanence of the installation of these cables. • SKDC would recommend that the Agriculture and Soil section of the ES should include a wider assessment of the cumulative impacts of the development to include other known NSIP developments for solar farms which are approved or proposed within Lincolnshire and Rutland. There are a significant number of NSIP developments and the cumulative impact of these projects on the best and most versatile agricultural land

	should be assessed as part of any Environmental Statement. These include Mallard Pass, Beacon Fen Energy Park, Cottam Solar Project, Fosse Green Energy Park, Gate Burton Energy Park, Heckington Fen Solar Farm, Leoda Solar Farm, One Earth Solar Farm, Springwell Solar Farm, Tillbridge Solar Project and West Burton Solar Project. • Whilst Lincolnshire has a large quantity and relatively high proportion of BMVAL, the potential development of 12 substantial NSIP-scaled solar farms (as currently registered with PINS) has the potential to result in a degree of cumulative adverse impact stemming from temporary loss of opportunity for the continued cultivation of potential BMVAL across the County. We would therefore request that the Planning Inspectorate give consideration to this issue and that cumulative agricultural land impacts are considered across the registered projects.

Comments on topics scoped out of the ES

Air Quality	• SKDC considers that there is currently insufficient information in relation to access and construction / decommissioning traffic to 'scope out' air quality from the ES.
Glint and Glare	• SKDC considers that there is currently insufficient information to 'scope out' glint and glare. • There is currently no information about the potential impacts with fixed panels vs tracker panels given that the scheme design is yet to be confirmed. The ES should therefore incorporate a full comparison of effects of fixed panels vs tracker panels at the site unless the detailed design has reached a point where the proposed panel type is confirmed.
Ground Conditions	No comments
Human Health	No comments
Major Accidents and Disasters	• It is considered that insufficient information has been provided on the proposed battery storage facility to justify scoping out of accidents and disasters.

Telecommunications, Television Reception and Utilities	No comments
Electromagnetic Field	No comments
Materials and Waste	No comments

Please do not hesitate to contact me should you need clarification on any of the points raised in this response.

Yours sincerely,

Adam Murray
Principal Development Management Planner

From: [redacted] on behalf of Customer
To: Kilnside Energy Park
Subject: RE: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification
Date: 23 June 2025 16:58:40
Attachments: image003.png
image005.jpg
image006.png
image007.png
image001.png

Good afternoon Gary,
The Kilnside Energy Park from what I can see isn't in our network area but Cadent Gas Network so you may want to send the information over to them.
Kind regards,
Rebecca Graham, Customer Service Advisor

Talk to us on Live Chat or email customer@sgn.co.uk
Extra Help for those who need it

SGN, Stroma Suite, Grampian House, 200 Dunkeld Road, Perth, PH1 3GH
Find us on Facebook and follow us on Twitter: @SGNgas

From: Kilnside Energy Park
Sent: 23 June 2025 10:16
To: Kilnside Energy Park
Subject: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification

Dear Sir/Madam,
Please see attached correspondence on the proposed **Kilnside Energy Park.**
The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.
The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **21 July 2025**. The deadline is a statutory requirement that cannot be extended.
Further information is included within the attached letter.
Kind regards

Gary Chapman (CEnv)
EIA and Land Rights Advisor (HEO)
The Planning Inspectorate

From: [redacted]
To: Kilnside Energy Park
Subject: Ref - EN0110022 Response
Date: 18 July 2025 09:52:43

EN0110022 - Kilnside Energy

Dear Sir/Madam

In response to your letter dated 23rd June please find below Uffington Parish Council response to the proposed development of Kilnside Energy Park

Kilnside Energy Park – Environmental Statement (ES) and the scoping process

- UPC is not opposed to the use and construction of solar panels but believes they are best placed on rooftops and brownfield land, not on productive agricultural land.
- The loss of BMV (best and most versatile) land on the scale contemplated, and on a permanent basis, weighs heavily against the proposed scheme, applying both national and local policy.
- the nature of extent of the harm to landscape and visual amenity is far beyond what would be necessary considering the proximity to Mallard Pass Solar project
- The harm to heritage assets is of great concern. The development will devalue substantially the historic heritage of this deeply rural area. The local area is rich with a large number of designated heritage assets of outstanding quality.
- The proposed development is on an unprecedented scale and will dominate the local area (along with Mallard Pass solar farm) and change the landscape forever affecting deeply rural communities and beautiful landscapes including the historic market towns of Stamford, Oakham, Bourne and Market Deeping.
- Will Kilnside Energy Park Ltd be able to demonstrate whether the development will be carbon positive, carbon neutral or carbon negative.

- Consideration to be given to adverse effects on the landscape to people's health and well-being and the quality of their lives.
- National and recently adopted local plan guidance is strongly against the loss of BMV land for solar farm use:
- The impact of associated infrastructure is disproportionate to the local environment and the local community
- noise and vibration are key concerns of the community especially given the long working hours

- Consideration must be given designated heritage sites

Please kindly confirm receipt

Yours faithfully
Katie Turner

Clerk to Uffington Parish Council
Email: uffingtonpc1@gmail.com
t:[redacted]

UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0110022
Our Ref: 92976 CIRIS

Mr Gary Chapman
Environmental Impact Assessment Advisor
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

21st July 2025

Dear Mr Chapman,

Nationally Significant Infrastructure Project: Kilnside Energy Park EN0110022

Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration; however, we do acknowledge due to the nature of the scheme and distance to receptors health impacts are anticipated to be low.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*', setting out aspects to be addressed within the Environmental Statement[1]. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Electro-Magnetic Fields (EMF)

In section 16.8.5.4 of the Scoping Report, the applicant proposes to scope out EMFs from underground 400 kV cables, based on design principles and codes of practice, but they do not provide references. In section 2.2.7.2 they also state that "where possible, the higher voltage cables will share trenches with the lower voltage cables on the same route".

Recommendation

UKHSA advises that according to the following voluntary Code of Practice, if the cable exceeds 132 kV, a calculation or measurement of the maximum fields directly above the cable is required to demonstrate compliance with the International Commission on Non-ionizing Radiation Protection (ICNIRP) Guidelines on Limiting Exposure to Electromagnetic Fields
https://assets.publishing.service.gov.uk/media/5a796799ed915d07d35b5397/1256-code-practice-emf-public-exp-guidelines.pdf

1 https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658

We request that the ES clarifies this and, if necessary, the proposer should confirm either that the proposed development does not impact any receptors from potential sources of EMF; or ensure that an adequate assessment of the possible impacts is undertaken and included in the ES.

Yours sincerely

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

From:	[redacted]
To:	Kilnside Energy Park
Cc:	[redacted]
Subject:	FW: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification
Date:	23 June 2025 16:20:13
Attachments:	image001.png image002.png ~WRD0000.jpg image931549.png image544302.png Kilnside Energy Park - Letter to stat cons Scoping & Reg 11 Notification.pdf

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> You don't often get email from [redacted]@wellandidb.org.uk. Learn why this is important

Dear Gary,

EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification

Thank you for your consultation but this project appears to fall outside of my Board's area. I attach the following link to our interactive map of the Board's area should you need it for reference and if anything should fall within our patch in the future please contact us as soon as possible: Map of District | Welland and Deepings Internal Drainage Board - Welland & Deepings Internal Drainage Board.

Yours faithfully,

CRAIG SHINKIN
Planning & Enforcement Officer

Deeping House
Welland Terrace
Spalding
PE11 2TD
www.wellandidb.org.uk
Tel: 01775 725861
Fax:01775 767689

From: Jane Picking
Sent: 23 June 2025 15:39
To: Craig Shinkin
Subject: FW: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification

Hi Craig

I don't think this is our patch – nearest seems to be Tallington and Uffington.

From: [redacted]
To: Kilnside Energy Park
Subject: EN011022
Date: 14 July 2025 10:49:27
Attachments: image001.png

You don't often get email from [redacted]@witham3idb.gov.uk. Learn why this is important

Dear PINS,

I am writing in response to your letter Dated 23/06/2025 regarding a scoping consultation for the application EN011022.

Witham and Humber Drainage boards act as agents for planning applications and consents for the IDB area of Welland and Deeping on behalf of Lincolnshire County Council.

It would appear there is potential for the cable route to cross this area, and as such, the board will need to be consulted for any works within an ordinary water course as part of this role as consenting authority.

I look forward to receiving further information in due course,

Kind Regards

Mark Ketley

Mark Ketley
Projects Engineer

Witham First District Internal Drainage Board
Witham Third District Internal Drainage Board
Upper Witham Internal Drainage Board
North East Lindsey Drainage Board
Witham House,
Meadow Lane,
North Hykeham,
LN6 9GJ
Office: +[redacted]
Mobile: [redacted]

From: Witham Parish Council
To: Kilnside Energy Park
Subject: Re: EN0110022 – Kilnside Energy Park – EIA Scoping and Consultation and Regulation 11 Notification
Date: 08 July 2025 14:16:23
Attachments: image001.png
image002.png

Dear Gary

Thank you for your letter which we were able to discuss at our meeting last night.

At this stage we have no comments on the application but would like to be able to make comments as and when the matter proceeds further

Kind regards

Bernard Champness
Clerk

On Mon, 23 Jun 2025 at 10:32, Kilnside Energy Park <kilnsideenergypark@planninginspectorate.gov.uk> wrote:

> **FAO Parish Clerk: Bernard Champness**
>
> Dear Mr Champness
>
> Please see attached correspondence on the proposed **Kilnside Energy Park.**
>
> The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.
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>
> Further information is included within the attached letter.
>
> Kind regards
>
> **Gary Chapman (CEnv)**
>
> EIA and Land Rights Advisor (HEO)
>
> The Planning Inspectorate
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> T: 0303 444 5051
>
> www.gov.uk/pins
>
> Ensuring fairness, openness and impartiality across all our services
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>