



11 September 2023

Maxine Simmons
Case Officer
Municipal Buildings
West Street
Boston
Lincolnshire
PE21 8QR

Dear Maxine Simmons,

H09-0699-23: Erection of a 49.9MW Ground Mounted Solar Array with Associated Underground Cable Route, Substation with POC Mast, Battery Storage and Ancillary Equipment & Structures at Caudwell Farm Holbeach St Matthews

Lincolnshire Wildlife Trust (LWT) wish to register a **holding objection** against this application due to the proximity of the proposed location site to The Wash SPA and The Wash and North Norfolk Coast SAC.

The minimum output for a solar farm to qualify for an NSIP is 50MW, it should be noted that this development is 49.9MW meaning it misses qualifying as an NSIP by a narrow margin. This should be taken into consideration when evaluating the impact of the development, especially in regards to the cumulative impact of the high number of similar developments in the area.

LWT advise that this is not an appropriate location for such a development, being only 3km from The Wash SPA and the Wash and North Norfolk Coast SAC. In addition to this proximity to the highly protected site, the proposed development site is directly connected to The Wash via an onsite drain. The ecology report provided highlights the risk of pollution of the onsite drain from sedimentation, vehicle effluent and other materials, which would in turn affect the SAC which is connected to the drain. While the report does go on to detail mitigation measures for these impacts LWT advise that, given the highly protected nature of the SAC, the level of risk involved is unacceptable.

While LWT do not usually provide comment on the ground conditions of proposed development sites, we do wish to highlight that this area is known for being of high quality, grade one agricultural land. While LWT are generally in favour of solar development, we advocate for responsible and well-placed development, namely that developments occur only on low grade soils and provide significant benefit to local ecology.

The Biodiversity Management Plan provided details impressive predicted gain on site, it does however give the impression that the majority of this gain will be delivered 'post development'. LWT wish to seek clarification on this issue as the gain in

Banovallum House
Manor House Street
Horncastle
LN9 5HF

01507 526667
info@lincstrust.co.uk
www.lincstrust.org.uk



*Lincolnshire Wildlife Trust
is a company limited by
guarantee registered in
England, no. 461863
and is registered as a
charity, no. 218895
VAT no. 613 9067 44*



biodiversity should be possible to deliver on this development during its operation and section 4.2 of the plan suggests that this would be the case. The ecological enhancement measures detailed in section 4.2 of the Biodiversity Management Plan are supported by LWT and we ask that they are made conditional to the approval of this application. The use of local provenience seeds should also be included in these measures as this would result in both a higher success rate and higher value to other local species present on site.

There is mention throughout the report of subsequent management of the site post construction, however no specifics are detailed and no timescale is mentioned. LWT ask that a management and monitoring plan, including the responsible party for this management, is provided that covers a minimum period of 30-years.

If you have any queries regarding the above, please do not hesitate to contact me.

Yours sincerely

Beth Fox

Conservation Officer

