

Fosse Green Solar – Written Representation from Alistair King (NKDC Resident)

I submit that this application should be refused in accordance with clauses within National Policy Statements which state that benefits must be weighed against harms. For example:

NPS-EN1 5.10.14 The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.

There are many areas where, by any reasonable judgement, the harms do outweigh the benefits. Below are samples of where this is the case.

A – Flaws with the Stated Benefits

- 1. Misleading number of homes:** The applicant states that the project will provide electricity for 110,000 homes. This is misleading. The time profile of energy production by the solar development over a year is almost directly opposite to the energy demand profile for homes over a year. This is true both on a seasonal and day/night basis. The number of homes statement is marketing hype and highly misleading. This metric implicitly assumes:
 - perfect grid balancing (their own batteries come nowhere close to achieving this).
 - other sources will fill peak demand and day/night/seasonal deficits.
 - that peak production can be guaranteed.

To counteract these deficiencies there are large additional hidden grid costs not accounted for in the application (but paid for by the consumer/taxpayer).

- 2. Very poor land efficiency:** The proposed solar factory will produce around 300 MWh of energy per acre per year. That is, one acre could supply around 110 homes each year (though in reality it can't because the energy is produced at the wrong time). Comparing this with, say, currently available Small Modular Reactors which produce 300 MW at a 90% capacity factor, thereby producing 2,365,200 MWh of energy per year on approximately 40 acres of land. This would power 21,900 homes per acre of land used - throughout the year.

All the figures are approximations, but a rough comparison is **110 vs 21,900 homes per acre** – and the 110 is not a correct figure due to the generation profile!

- 3. Costs not fully accounted:** The investment is attractive to the applicant due to being able to access long term guaranteed electricity prices from the government (hence consumer/taxpayer). Landowners and the investment company profit from this because they do not have to account for the cost of long-term residual harms to the character of the countryside which is large and real loss to local people and visitors.

B – The Harms

The value of our open landscapes is being underestimated. North Kesteven District Council states: “Open spaces are hugely important and valuable assets, and are proven to improve public health, wellbeing and quality of life”.

There are also well documented problems with the assessment approach taken which have perhaps led to or enabled under-statement. For example, flaws with the methodology include:

1. False Impression of Precision

The use of a very precise methodology for LVIA assessment gives the impression that the results are precise. It leads to both the authors and readers believing that they have a more accurate assessment of harms than they actually have.

2. Applicant-Commissioned Assessments

Quote from an article on LandscapeArchitecture.org.uk, where a landscape professional reflects on their experience with the GLVIA and the Landscape Institute’s role:

“At times it seems to me to be a ‘developer’s charter’. It often fails to adequately allow reasoned defence of our precious landscape resources – especially the ordinary landscapes so important to local communities”

3. Viewpoint Selection Bias

The applicant has chosen around 35 viewpoints within or adjacent to the site area, plus a further 9 within the Zone of Theoretical Visibility.

Given the size of the areas involved, the combined lengths of footpaths, tracks and roads accessible to the public probably runs into many hundreds of miles. A significant proportion of this length will have views of the infrastructure proposed. So, there is only perhaps one viewpoint per tens of miles. In reality there are an infinite number of viewpoints (literally). Clearly 35 viewpoints cannot possibly come anywhere close to providing a comprehensive base for the assessment of the harms that will be caused to views. This is a clear example of giving a false sense of precision.

4. Inherent Subjectivity Bias

Although the methodology with its rules, procedures and weightings appears to be objective, virtually every aspect of it involves subjectivity. Therefore, as it is carried out and paid for by the applicant in support of their case, it is not unreasonable to be suspicious of bias in their favour. The following examples demonstrate this.

Example 1: viewpoint 22 (view west) [EN010154-000183-6.2 Fig 10-7]

This is analysed in: Recreational Users [EN010154-000494-6.3 ES Appendix 10-F Visual Assessment Table 38]. (see images below)

The 'Visual Susceptibility' is judged Medium and 'Value of Views' judged Medium. The 'Visual Sensitivity' is determined as a combination of these and judged as Medium.

This is the main (and only) public footpath to the west of Bassingham out to and over the River Witham. Immediately after exiting the enclosed part of the path between properties the walker enters onto the elevated footbridge. It is the first vista of open countryside after leaving the town, and the combination of river and green fields is a delight.

The Susceptibility, Value and Visual Sensitivity of this view should be High.

The applicant analysis defines the Operation Year 1 Winter as Medium and Years 15 Summer and Winter as Low. The methodology then interprets year 15 'Level of Effect and Significance' as 'Minor Adverse' – interpreted as insignificant therefore not counting as a harm.

No amount of mitigation would improve the views of acres of panels which were once open fields. Where hedges are used, they will not hide the panels from the elevated position on the bridge, and will adversely affect the character of the ongoing walk, including the option heading north by turning the open aspect into viewless tunnels.

Walkers would judge this as highly adverse and very significant.

The continuing 'Level of Effect and Significance' should be 'Major (Significant)'.

Example 2: viewpoint 7 (view south west) [EN010154-000183-6.2 Fig 10-7]

This is analysed in: Table 51: Users of Fosse Lane, Haddington Labe and the A46 overbridge [EN010154-000494-6.3 ES Appendix 10-F Visual Assessment Table 51]. (note that the applicants' photos just show two views south west directly along the line of the A46 - see two images below giving the north and north westerly view)

The Visual Susceptibility, Value of Views and Visual Sensitivity are judged Medium.

This road leads up and over the A46 and for travellers heading north this is the first sight of Thorpe on the Hill and the surrounding high ground to the north and north west. As such it is a very pleasant vista, fostering anticipation of the open countryside to follow.

The Susceptibility, Value and Visual Sensitivity of this view should be High.

The applicant analysis further defines the Operation Year 1 Winter as Low and Years 15 Summer and Winter as Low, and thus year 15 'Level of Effect and Significance' as 'Minor Adverse' – interpreted as insignificant and not counting as a harm.

No amount of mitigation can restore the views from here once hundreds of acres of panels are installed. They will still be highly visible from this viewpoint, and will continue to be highly detrimental to the character of the landscape.

The continuing 'Level of Effect and Significance' should be 'Major (Significant)'.

Example 3: viewpoint 4 (View south-west from PRow TOTH/6/1) [EN010154-000183-6.2 Fig 10-7]

This is analysed in: Table 32: Recreational users of PRow TOTH/6/1 and TOTH/6A/1 [EN010154-000494-6.3 ES Appendix 10-F Visual Assessment Table 51].

The Visual Susceptibility, Value of Views and Visual Sensitivity is judged Medium. The applicant states: "The views are experienced by recreational users of Public Rights of Way, where **appreciation of the view is unlikely to be the primary interest**, as such the susceptibility is Medium".

This is part of the popular 'Stepping Out' path network and its key feature is the stunning views and open character of the area. The Stepping Out leaflet describes the area as having '... lovely views back to the village'. What is more, this kind of higher landscape is quite rare in the area and thus highly valued.

For this reason, the applicants' initial assessments of Medium should be High.

The year 15 assessments of 'Minor adverse' (insignificant) is wrong by any reasonable judgment.

Furthermore, the planned mitigation for this area, i.e. tall hedgerows to screen the panels, will have i) limited effect due to undulation of the land, and ii) create a 'tunnelling' effect on paths thus destroying the open views that are a key feature of the area, and why it is so popular as a 'stepping out' route.

- 5. Cumulative Impact Understated:** I believe the cumulative effect during operation is being understated. For example, in accumulation with Leoda, during operation, ref: 10.10.37/38, only mentions the effect on the sub-area Limestone Heath, whereas there will be a long-term cumulative impact on the whole of the Low Fields South, Low Fields North and Lincoln Cliff sub-areas. Residents, visitors and travellers through the area will be affected both concurrently and sequentially.

- 6. Multiple Visual Harms**

Multiple visual harms should be assessed by considering the overall aggregation and combined magnitude of effects. When there is an extremely low number of considered viewpoints relative to the large size of the area, there is a tendency to think of the overall impact as lower.

7. Number of People Affected

The assessment takes insufficient account of the number of people affected by the landscape harm in general, or at the specific viewpoints. There are more than 10,000 people directly affected in the immediate vicinity, then tens of thousands more visitors and people travelling through the region.



Viewpoint 22 Looking West



Viewpoint 22 Looking North West



Viewpoint 7 Looking North West



Viewpoint 7 Looking North