

# FOSSE GREEN ENERGY EXAMINATION

## WRITTEN REPRESENTATION – ANDREW KEELING (IP Ref: [REDACTED])

I am a long-standing resident of Bassingham. I am fully in favour of renewable energy development provided that renewable energy infrastructure projects comply with national planning policy. I believe that the Fosse Green Energy solar farm proposal is contrary to a number of the key priorities for solar deployment that are set out in NPS EN-3, and should not therefore be approved.

There are four key points that I would like to focus on:

1. The selection of the site and consideration of alternatives
2. The cumulative impacts of all of the renewable energy infrastructure that approval of the Fosse Green Energy DCO application is likely to trigger
3. The need to consider the case for the proposed electricity substation at Navenby against national planning policy priorities for solar deployment
4. The likely impact on recreational walking around Bassingham and Aubourn

### a) The Selection of the Site and Consideration of Alternatives

**The Examining Authority needs to clearly understand how the site was selected and the fact that no alternatives were considered prior to its selection.**

#### **NPS EN-3 References**

##### *Para 2.10.21*

*Applicants should, where possible, utilise 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 Best and Most Versatile agricultural land where possible.*

##### *Para 2.10.23*

*Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.*

##### *Para 2.10.17*

*To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity, and reduce overall costs, applicants may choose a site based on nearby available grid export capacity.*

1.1. Para 2.3.1 of the Fosse Green Energy Site Selection Report (Appendix A to the Planning Statement – document AS-098) clearly states that the site was selected as the result of an approach from the landowners. It was not selected following a search for sites that:

- a) Wholly, mainly or partially utilise the types of land that paras 2.10.21 and 2.10.23 of NPS EN-3 prioritise for solar deployment (brownfield, previously developed, contaminated and industrial land);
- b) Avoid the use of BMV agricultural land, as required by para 2.10.21 of NPS EN-3;
- c) Can achieve a connection to the existing grid infrastructure, as prioritised by para 2.10.17 of NPS EN-3.

1.2. I contend that the initial selection of the site was therefore contrary to the site selection priorities for solar deployment that are articulated in these paragraphs of NPS EN-3. The Site Selection Report only considers alternative sites within a 15km radius of the Navenby substation that National Grid has **subsequently proposed** in response to grid connection requests from Fosse Green Energy and other solar farm and BESS projects in the area. The Site Selection Report makes no reference to a new substation being proposed at Navenby at the time when the site was initially selected.

## **b) Cumulative Impacts**

**The full extent of the cumulative impacts of all of the renewable energy infrastructure projects that approval of the Fosse Green Energy DCO application could help to trigger needs to be clearly understood.**

### **NPS EN-3 Reference**

*Para 2.10.18*

*Applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure*

2.1. The National Grid submission at the pre-examination stage references seven generation projects that are requesting a grid connection through its proposed substation at Navenby. This is a further four projects in addition to the Fosse Green Energy, Springwell and Leoda solar farms that have so far been announced. Full details of these additional projects need to be understood. The Navenby and Coleby (Brant) BESS proposals also need to be included in the consideration of cumulative impacts. The assessment needs to weigh the renewable energy benefits against the detrimental impacts on what is a relatively small rural area in terms of harms to landscape and rural character; agricultural production and economy; the amenity of resident communities; and countryside recreation. I contend that the devastating irreparable impacts of so many renewable energy infrastructure projects in such a small rural area cannot be viewed as acceptable.

## c) The Navenby Substation

**The case for the Navenby substation needs to be assessed against national planning policy for solar deployment.**

### **NPS EN-3 Reference**

*Para 2.10.17*

*To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity, and reduce overall costs, applicants may choose a site based on nearby available grid export capacity.*

- 3.1. The proposed substation at Navenby is clearly pivotal to the cumulative impacts of all of the renewable energy infrastructure projects that it will allow to go ahead. Approval of the Fosse Green Energy DCO application is likely to play a key role in the determination of the planning application for the Navenby substation. Para 2.3.1. of the Site Selection Report for the Fosse Green Energy proposal clearly states that there was no existing grid connection available for the solar farm to connect into at the time that the site was selected. The consultation document that National Grid produced for the substation project in September 2024 states that it is only bringing forward the Navenby substation proposal in response to the connection requests that it has received from the solar farm projects in the area, including Fosse Green Energy, which, as a regulated organisation, it is legally obliged to respond to. There is no evidence that National Grid was already considering Navenby as a strategically appropriate location for a new substation on the national electricity network. It is evident that the Navenby substation proposal is being driven by the solar farm projects rather than national or local planning policy priorities.
- 3.2. The planning application for the substation will be determined by NKDC Planning Committee, or the Planning Inspectorate at appeal. Neither the applicant or NKDC officers can give the ExA any certainty regarding whether the substation will be approved.
- 3.3. I contend that the Navenby substation is contrary to most of the relevant policies of the Central Lincolnshire Local Plan:

#### **a) Policy S16 - Wider Energy Infrastructure**

As it will not be possible to adequately mitigate against the harms arising from the substation and the cumulative impacts from the excessive number of renewable energy infrastructure projects that its approval will give rise to in the area.

#### **b) Policy S5 - Development in the Countryside**

As the substation and the renewable energy projects that it will support will directly and cumulatively result in unacceptable harm to the rural character of the area.

**c) Policy S53 – Design and Amenity**

As the substation and the renewable energy projects that it will support will fail directly and cumulatively to contribute to local character and distinctiveness and cannot be satisfactorily assimilated into the surrounding area.

**d) Policy S67 – Best and Most Versatile Agricultural Land**

The substation may result in the loss of BMV agricultural land, and the renewable energy projects that it will support will take a significant amount of BMV agricultural land out of food production.

- 3.4. I also contend that the substation proposal does not comply with NPS EN-3, as it cannot support solar farm projects on the types of land that paras 2.10.21 and 2.10.23 prioritise for solar deployment. Para 4.3.6. of the Fosse Green Energy Site Selection Report states that 'the search of previously development land (within the 15km radius of the proposed Navenby substation) identified no land of sufficient size to facilitate a large-scale solar project'. The proposed Navenby substation can thus only support solar farm developments on agricultural land, contrary to the priorities set out in NPS EN-3.

**d) Impact on Recreational Walking**

**The impacts on recreational walking routes and the efforts that the applicant has gone to in order to protect and enhance them through the design of the project need to be probed.**

**NPS EN-3 Reference**

*Para 2.10.35*

*Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way.*

*Para 2.10.36*

*Applicants should consider and maximise opportunities to facilitate enhancement to public rights of way*

- 4.1. The Fosse Green Energy proposal will have a significant detrimental impact on key recreational walking routes around Bassingham and between Bassingham and Aubourn. Solar panel arrays will run alongside the public footpath to the west of Bassingham that connects Thurlby Road and Church Bridge, providing a popular walk for people circumnavigating the village. Walkers using the promoted circular walk between Bassingham and Aubourn will be forced to walk very close to or through solar panel arrays, significantly detracting from the recreational experience of this route. The applicant has made no real attempt to lessen these impacts through the design of the project and makes no effort to enhance these recreational walking opportunities, which could have been achieved through a more thoughtful design approach.