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To whom it may concern,

This Written Representation is submitted on behalf of **Lincolnshire Against Needless Destruction (LAND)**, a community-led organisation dedicated to protecting Lincolnshire's landscapes, agricultural heritage, biodiversity, and rural communities from poorly planned or disproportionate large-scale infrastructure. LAND has engaged extensively with Nationally Significant Infrastructure Projects (NSIPs) across the county and has developed a detailed understanding of the cumulative pressures facing Lincolnshire as a result of multiple overlapping energy schemes.

LAND's interest in the Fosse Green Energy project arises from its scale, its location within an already heavily targeted county, and its contribution to a pattern of cumulative land-take, landscape industrialisation, and infrastructure sprawl that is not being adequately assessed or managed at a strategic level. LAND submits that the Fosse Green Energy Development Consent Order (DCO) must therefore be scrutinised with particular care, especially in relation to cumulative impacts, agricultural land loss, landscape character, and the fairness and adequacy of the process by which it has been advanced.

Project Overview

Fosse Green Energy is a proposed large-scale solar photovoltaic generating station with associated battery storage, substations, and a significant grid connection corridor. The project occupies a substantial area of land south and south-west of Lincoln, affecting multiple rural communities and high-value agricultural landscapes. It also includes a long underground cable route to connect to a new National Grid substation, extending the project's footprint far beyond the generating area itself.

The scheme comes forward at a time when Lincolnshire is already facing an unprecedented concentration of major energy infrastructure proposals. Local authorities have repeatedly expressed concern that the cumulative effects of these projects — including the loss of productive farmland, the industrialisation of rural landscapes, and the burden placed on local communities — are not being properly considered or mitigated. LAND shares these concerns and submits that Fosse Green cannot be assessed in isolation.

1. Cumulative Loss of Agricultural Land and Food Security

Lincolnshire is one of the UK's most productive agricultural counties, supplying a significant proportion of the nation's vegetables, cereals, and horticultural crops. The Fosse Green Energy project proposes the long-term conversion of a very large area of farmland to industrial-scale energy generation. On its own, this represents a substantial loss of productive land. When considered alongside the numerous other solar NSIPs and major energy schemes targeting Lincolnshire, the cumulative impact becomes a matter of **national food security**, not simply local land-use change.

1.1 ALC surveys exist, but transparency and completeness are lacking The applicant states that Agricultural Land Classification (ALC) surveys have been undertaken and that "72% of the project's physical infrastructure will be built on poorer quality land". However, this headline figure is insufficient for meaningful scrutiny. The applicant has not provided:

- A full site-wide breakdown of ALC grades (1, 2, 3a, 3b, 4, 5)
- Clear mapping showing the distribution of BMV land across the site
- An explanation of how the remaining **28%** of land (which may include BMV) will be affected
- A cumulative assessment of agricultural land loss across Lincolnshire

Without this information, the Examining Authority cannot determine whether the applicant has genuinely minimised impacts on BMV land, as required by **NPS EN-1** and **NPS EN-3**.

1.2 The project lifespan is 60 years — a long-term loss of agricultural capacity The applicant is seeking a **60-year Development Consent Order** for construction, operation, maintenance, and decommissioning. A 60-year operational period:

- Removes agricultural land from production for the majority of a human lifetime
- Spans two full generations of farming succession
- Exceeds the operational lifespan of many other energy assets
- Cannot reasonably be described as "temporary" in planning terms

The long-term sterilisation of productive farmland must therefore be treated as a **significant and enduring impact**, not a reversible short-term change.

1.3 Lincolnshire is being disproportionately targeted for solar NSIPs Local authorities have already expressed concern that Lincolnshire is facing an unprecedented concentration of large-scale energy schemes, each removing productive farmland and industrialising rural landscapes. Fosse Green adds materially to this pressure.

The Environmental Statement does not provide:

- A cumulative assessment of agricultural land loss across all relevant NSIPs
- An explanation of why Lincolnshire is being asked to absorb such a disproportionate share of national solar deployment
- Any strategic justification for concentrating multiple large solar schemes in one of the UK's most important food-producing counties

This omission is a significant flaw in the applicant's assessment.

1.4 National food security is a material consideration The UK is increasingly reliant on imported food, and climate-driven disruptions to global supply chains are becoming more frequent. Removing thousands of acres of productive farmland from one of the UK's most important agricultural counties is inconsistent with:

- National food security objectives
- The Government's Food Strategy
- The principles of sustainable development in the NPPF
- The requirement in NPS EN-1 to consider the long-term availability of agricultural land

LAND submits that food security must be treated as a **central issue** in this Examination.

1.5 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide:

- A full breakdown of ALC grades across the entire site
- Clear mapping of BMV land and how it will be affected
- A cumulative assessment of agricultural land loss across Lincolnshire
- A justification for the 60-year removal of productive farmland
- An explanation of why this county, above others, is being targeted for multiple overlapping solar NSIPs

Until this information is provided, the agricultural impacts of Fosse Green cannot be properly understood or assessed.

2. Cumulative Landscape and Rural Character Impacts

Lincolnshire's rural landscape is defined by open vistas, agricultural patterns, historic villages, and long-established field structures. These characteristics are central to the county's identity and are repeatedly recognised in local landscape assessments. The Fosse Green Energy project, by virtue of its scale, massing, and spatial spread, would introduce a substantial industrial presence into this landscape. When combined with the numerous other NSIPs and large-scale solar schemes proposed across the county, the cumulative effect is one of **progressive landscape industrialisation**.

2.1 The scale of Fosse Green is landscape-defining The project covers a very large land area, extending across multiple parcels and affecting several rural communities. Its footprint is not confined to a single block of land but is dispersed across a broad area, creating a patchwork of industrialised zones interspersed with farmland. This pattern of development fundamentally alters the character of the landscape, replacing open agricultural vistas with extensive arrays of solar panels, fencing, substations, and access tracks.

2.2 The 60-year operational period intensifies landscape harm A 60-year lifespan means that the landscape change is effectively permanent for current and future generations. The notion that the land will be “restored” after six decades does not mitigate the fact that the rural character of the area will be transformed for the majority of a human lifetime. This long-term industrialisation must be treated as a significant adverse effect in the planning balance.

2.3 Lincolnshire is already experiencing cumulative landscape pressure Local authorities have repeatedly raised concerns that Lincolnshire is being targeted by a disproportionate number of large-scale energy schemes. Each project introduces:

- Perimeter fencing
- Security cameras
- Inverter stations
- Substations
- Access roads
- Battery storage compounds
- Cable corridors

Individually, these elements may be described as “localised”. Collectively, they represent a **systemic shift** in the character of the county’s rural environment.

Fosse Green contributes materially to this cumulative transformation.

2.4 The Environmental Statement underestimates cumulative landscape effects

The applicant’s assessment focuses primarily on the visibility of the scheme from specific viewpoints. This approach fails to capture:

- The **combined visual envelope** of multiple NSIPs
- The **sequential experience** of travelling through a landscape increasingly dominated by energy infrastructure
- The **loss of rural tranquillity** associated with construction, maintenance, and security operations
- The **perception of industrialisation**, even where screening is proposed

Landscape character is not solely a matter of visibility; it is also about **sense of place**, **coherence**, and **continuity**. The ES does not adequately address these dimensions.

2.5 The grid connection corridor extends the landscape impact far beyond the generating area The underground cable route and associated infrastructure create a

linear zone of disruption stretching for many kilometres. This corridor introduces construction compounds, haul routes, hedgerow removal, and long-term maintenance access. It also establishes a precedent for further grid-related infrastructure in the same corridor.

The landscape impact of Fosse Green is therefore not confined to the generating area but extends across a much wider geography.

2.6 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide:

- A **comprehensive cumulative landscape assessment** incorporating all relevant NSIPs and major solar schemes in Lincolnshire
- A **sequential landscape assessment** reflecting the experience of residents and road users
- A clear explanation of how a **60-year industrial presence** can be reconciled with the preservation of rural character
- A full assessment of the **landscape impacts of the grid connection corridor**, including construction and long-term maintenance

Until this information is provided, the landscape and rural character impacts of Fosse Green cannot be properly understood or assessed.

3. Grid Connection, Cable Corridor and Spatial Sprawl

The Fosse Green Energy project is not confined to its generating area. The grid connection infrastructure — including the long underground cable corridor, construction compounds, haul routes, and the proposed new National Grid substation — significantly expands the project's footprint and multiplies its impacts. This spatial sprawl is a defining characteristic of modern NSIPs and must be assessed as such.

3.1 The grid connection corridor extends impacts far beyond the solar array The underground cable route stretches for many kilometres across rural Lincolnshire, cutting through farmland, hedgerows, drainage systems, and established field patterns. This corridor introduces:

- Extensive trenching and soil disturbance
- Hedgerow removal and habitat fragmentation
- Construction compounds and laydown areas
- Long-term access routes for maintenance
- Potential constraints on future agricultural operations

These impacts are not temporary inconveniences; they reshape the landscape and agricultural function of the corridor for decades.

3.2 The Environmental Statement underestimates the scale and duration of corridor impacts The applicant’s assessment treats the cable corridor as a linear, short-term construction feature. This is misleading. In reality:

- Soil structure can take decades to recover from deep trenching
- Hedgerow re-establishment is slow and uncertain
- Drainage systems may be permanently altered
- Maintenance access requirements create long-term land-use constraints
- The corridor becomes a **permanent infrastructure footprint**, even if buried

The ES does not adequately assess these long-term effects.

3.3 The corridor creates a precedent for further infrastructure Once a cable corridor is established, it becomes a logical route for:

- Future grid reinforcements
- Additional NSIP connections
- Upgrades to the new substation
- Co-located energy infrastructure

This “infrastructure magnetism” is a well-recognised phenomenon in NSIP planning. The applicant has not assessed the risk that the corridor will attract further development, compounding cumulative impacts.

3.4 The new National Grid substation intensifies spatial sprawl The project relies on a new National Grid substation, which itself is a major piece of infrastructure.

Substations:

- Require large footprints
- Introduce tall structures, lighting, and fencing
- Generate noise and visual impacts
- Often become hubs for additional connections

The applicant has not provided a robust cumulative assessment of how this new substation will interact with other planned or potential NSIPs in the region.

3.5 The corridor fragments rural character and community cohesion The cable route passes close to multiple villages and rural settlements. Even when buried, the corridor:

- Disrupts footpaths and local access
- Alters the setting of rural communities
- Creates long-term construction disturbance
- Contributes to a sense of industrial encroachment

For communities already facing multiple NSIPs, this adds to a growing perception that Lincolnshire’s rural identity is being eroded piece by piece.

3.6 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide:

- A full cumulative assessment of the grid connection corridor, including long-term soil, drainage, and agricultural impacts
- A sequential assessment of community and landscape effects along the entire route
- A justification for the chosen corridor alignment, including alternatives considered
- A cumulative assessment of the new substation's role in attracting further infrastructure
- A clear explanation of how the applicant will mitigate long-term fragmentation of rural character

Until this information is provided, the spatial impacts of Fosse Green cannot be properly understood or assessed.

4. Policy Conflict and Energy Strategy

The Fosse Green Energy project is presented as a necessary contribution to national renewable energy targets. However, when assessed against the relevant policy framework — including the **Planning Act 2008**, **NPS EN-1**, **NPS EN-3**, the **NPPF**, and the Government's own **Energy Security Strategy** — the proposal exhibits multiple areas of conflict. These conflicts are amplified by the cumulative concentration of solar NSIPs in Lincolnshire, which is not supported by any coherent national or regional spatial strategy.

4.1 The proposal conflicts with NPS EN-1 requirements for sustainable land use

NPS EN-1 requires decision-makers to consider the long-term availability of agricultural land and to avoid significant adverse impacts on BMV land where possible. While the applicant claims to have undertaken ALC surveys, the Environmental Statement does not demonstrate:

- That BMV land has been avoided “as far as practicable”
- That alternative sites or configurations were meaningfully assessed
- That the cumulative loss of agricultural land across Lincolnshire has been considered

This is a clear policy gap.

4.2 NPS EN-3 requires careful consideration of site selection — which is absent here EN-3 emphasises that solar developers must justify their choice of location, including:

- Why the site is suitable
- What alternatives were considered

- How impacts on agricultural land, landscape, and communities have been minimised

The applicant has not provided a robust alternatives assessment. There is no evidence that:

- Brownfield land
- Rooftop solar
- Distributed generation
- Co-location with existing infrastructure

were seriously evaluated as alternatives to the large-scale conversion of productive farmland.

4.3 The proposal conflicts with the Government's Energy Security Strategy The UK's Energy Security Strategy emphasises:

- Diversification of renewable energy sources
- Protection of domestic food production
- Efficient use of land
- Acceleration of rooftop and brownfield solar

Fosse Green does not align with these principles. Instead, it contributes to a pattern of **land-intensive, geographically concentrated solar deployment** in a county that is already disproportionately affected.

4.4 The Planning Act 2008 requires meaningful consultation — which has not occurred Under Sections 42, 47, and 48 of the Planning Act 2008, developers must undertake:

- Early
- Proportionate
- Effective
- Transparent

consultation with affected communities.

LAND submits that:

- Consultation has been inconsistent across NSIPs in the region
- Communities are experiencing consultation fatigue due to the sheer number of overlapping schemes
- The applicant has not demonstrated that consultation feedback has meaningfully shaped the proposal

This undermines the legitimacy of the process.

4.5 The proposal fails to align with local policy and community priorities Local authorities in Lincolnshire have repeatedly expressed concern that:

- The county is being targeted disproportionately
- Rural character is being eroded
- Agricultural land is being lost at an unsustainable rate
- Infrastructure is being imposed without strategic coordination

The Fosse Green proposal does not address these concerns and does not align with local spatial strategies or rural protection policies.

4.6 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide:

- A full alternatives assessment, including brownfield and rooftop options
- A justification for the concentration of solar NSIPs in Lincolnshire
- Evidence that consultation feedback has shaped the proposal
- A clear explanation of how the scheme aligns with EN-1, EN-3, and the Energy Security Strategy
- A demonstration that agricultural land impacts have been minimised in accordance with national policy

Until this information is provided, the proposal cannot be considered compliant with the relevant policy framework.

5. Consultation Quality and Democratic Deficit

The Planning Act 2008 places a clear statutory duty on developers to undertake early, proportionate, and effective consultation with affected communities. LAND submits that the consultation undertaken for Fosse Green Energy falls short of these requirements and contributes to a wider pattern of democratic deficit across energy NSIPs in Lincolnshire.

5.1 Consultation fatigue is a real and material issue in Lincolnshire Communities across the county are currently facing multiple overlapping NSIPs, each requiring engagement with lengthy, technical, and resource-intensive consultation processes. This includes solar farms, grid reinforcements, substations, and cable corridors. The cumulative effect is that:

- Residents are overwhelmed by the volume of consultations
- Parish councils are stretched beyond capacity
- Community groups are forced to divide limited resources across multiple schemes

The Planning Act 2008 does not anticipate a situation where one county is targeted by such a concentration of NSIPs. The applicant has not demonstrated how it has adapted its consultation approach to account for this unprecedented burden.

5.2 Consultation materials were highly technical and inaccessible to many residents The consultation documents for Fosse Green were extensive, complex, and often written in specialist language. While this may be unavoidable for certain technical assessments, the applicant has a duty under Section 47 of the Planning Act to ensure that consultation materials are:

- Clear
- Accessible
- Understandable to non-experts

LAND submits that the applicant did not provide adequate non-technical summaries, visualisations, or plain-English explanations to enable meaningful engagement from the general public.

5.3 The applicant has not demonstrated that consultation feedback shaped the proposal Under the Planning Act 2008, developers must show how consultation responses have influenced the design of the scheme. LAND notes that:

- The applicant has not provided clear evidence of design changes resulting from community feedback
- Key concerns raised by residents — including agricultural land loss, landscape impact, and cumulative effects — appear to have been acknowledged but not meaningfully addressed
- The Consultation Report focuses on process rather than outcomes

This undermines the legitimacy of the consultation exercise.

5.4 The consultation did not adequately address cumulative impacts Residents repeatedly raised concerns about the cumulative effects of multiple NSIPs in Lincolnshire. The applicant's consultation materials:

- Treated Fosse Green largely in isolation
- Provided limited information on how the scheme interacts with other solar farms, grid projects, or infrastructure proposals
- Did not offer cumulative visualisations or cumulative agricultural land assessments

This omission prevented consultees from understanding the full implications of the proposal.

5.5 The consultation process did not reflect the scale or duration of the project A 60-year industrial development with a multi-kilometre cable corridor and a new National Grid substation requires a consultation process that is proportionate to its impacts. LAND submits that:

- The consultation period was insufficient for a project of this scale
- The applicant did not provide adequate opportunities for in-person engagement
- Key communities along the cable corridor were not meaningfully involved
- The consultation did not reflect the long-term nature of the impacts

5.6 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide:

- Evidence of how consultation feedback has shaped the proposal
- A clear explanation of how the consultation complied with Sections 42, 47, and 48 of the Planning Act 2008
- A cumulative consultation assessment addressing the burden placed on Lincolnshire communities
- Additional engagement with communities along the cable corridor
- A revised non-technical summary that is accessible to the general public

Until these issues are addressed, the consultation cannot be considered adequate or compliant with statutory requirements.

6. Alternatives, Site Selection and Over-Concentration in Lincolnshire

The Planning Act 2008 and the National Policy Statements (EN-1 and EN-3) require developers to demonstrate that they have selected sites responsibly, considered reasonable alternatives, and minimised adverse impacts. LAND submits that the Fosse Green Energy proposal fails to meet these requirements. The applicant has not provided a robust alternatives assessment, nor has it justified why Lincolnshire — one of the UK's most important agricultural counties — should host yet another large-scale solar NSIP.

6.1 The applicant has not demonstrated that alternative sites were meaningfully considered NPS EN-1 requires developers to explain why their chosen location is suitable and what alternatives were assessed. EN-3 goes further, stating that solar developers must consider:

- Brownfield land
- Previously developed land
- Rooftop solar
- Co-location with existing infrastructure
- Smaller distributed sites rather than a single large land-take

The applicant has not provided evidence that these alternatives were seriously evaluated. Instead, the proposal relies on the availability of large tracts of agricultural land — a choice driven by convenience, not necessity.

6.2 The proposal contributes to an over-concentration of solar NSIPs in

Lincolnshire Lincolnshire is already facing an unprecedented number of large-scale solar and energy infrastructure proposals. This clustering is not the result of a national strategy but of developers independently targeting the county due to:

- Large fields
- Flat topography
- Existing grid constraints that attract reinforcement projects
- A lack of national spatial planning for solar

The cumulative effect is that Lincolnshire is being asked to absorb a disproportionate share of the national solar burden, with no strategic justification.

6.3 The applicant has not justified why this county should bear this level of impact

The Environmental Statement does not address:

- Why Lincolnshire is an appropriate location for yet another solar NSIP
- How the proposal fits within a wider national or regional energy strategy
- Whether other regions with lower agricultural value were considered
- Whether a distributed approach could achieve the same output with less harm

This is a significant omission, given the scale of the project and its 60-year operational period.

6.4 The absence of a national spatial strategy does not absolve the applicant of responsibility

While the UK currently lacks a national land-use framework for solar deployment, this does not permit developers to cluster NSIPs in a single county without justification. In fact, the absence of such a framework makes it even more important that:

- Alternatives are rigorously assessed
- Cumulative impacts are fully considered
- Regional equity is taken into account

The applicant has not done so.

6.5 The site selection process appears driven by land availability, not suitability

The proposal relies heavily on the fact that large parcels of agricultural land are available. This is not a valid planning justification. Site selection must be based on:

- Minimising harm
- Avoiding BMV land
- Protecting rural character
- Reducing cumulative impacts
- Ensuring fair distribution of infrastructure

The applicant has not demonstrated that these principles guided the site selection process.

6.6 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide:

- A full alternatives assessment, including brownfield, rooftop, and distributed options
- A justification for the concentration of solar NSIPs in Lincolnshire
- Evidence that site selection was based on minimising harm, not simply land availability
- A cumulative assessment of regional solar deployment across the UK
- An explanation of how the proposal aligns with national energy strategy and regional equity

Until this information is provided, the site selection and alternatives assessment cannot be considered adequate or compliant with national policy.

7. Procedural Robustness, Evidence Gaps and Internal Inconsistencies in the Application

A Development Consent Order must be supported by a complete, internally consistent, and methodologically robust evidence base. LAND submits that the Fosse Green Energy application contains significant gaps, omissions, and inconsistencies that undermine the reliability of the Environmental Statement (ES) and the applicant's overall case. These issues materially affect the Examining Authority's ability to assess the true impacts of the proposal.

7.1 Key assessments are incomplete or insufficiently evidenced Across multiple chapters of the ES, the applicant relies on headline statements without providing the underlying data needed for scrutiny. Examples include:

- Agricultural Land Classification (ALC) results summarised without full mapping or grade breakdown
- Landscape assessments that focus on isolated viewpoints rather than sequential or cumulative experience
- Cable corridor impacts described as "temporary" without long-term soil, drainage, or agricultural recovery evidence
- Traffic and transport assessments that do not fully account for construction intensity along rural lanes

These omissions prevent consultees and the Examining Authority from forming an informed view of the project's true impacts.

7.2 Internal inconsistencies undermine confidence in the assessment LAND has identified several areas where the applicant’s own documents appear inconsistent. These include:

- Describing the project as “temporary” while simultaneously seeking a **60-year operational period**
- Claiming to avoid BMV land “as far as practicable” while not providing the full ALC dataset needed to verify this
- Presenting the cable corridor as a short-term disturbance despite acknowledging long-term maintenance access requirements
- Stating that cumulative impacts have been considered while providing minimal cumulative analysis in key ES chapters

Such inconsistencies raise legitimate concerns about the reliability of the applicant’s conclusions.

7.3 The cumulative assessment is methodologically weak The ES repeatedly states that cumulative effects have been considered, yet:

- The list of cumulative schemes is incomplete
- Several relevant NSIPs in Lincolnshire appear to be omitted or under-weighted
- Cumulative agricultural land loss is not quantified
- Cumulative landscape change is not assessed at a strategic level
- The cumulative burden on rural communities is not addressed

Given the unprecedented concentration of NSIPs in Lincolnshire, this is a serious deficiency.

7.4 The applicant relies heavily on mitigation without demonstrating its effectiveness Across multiple ES chapters, impacts are downgraded from “significant” to “not significant” based on proposed mitigation. However:

- The effectiveness of screening, hedgerow planting, and landscape buffers over a 60-year period is not evidenced
- Soil recovery after deep trenching is assumed rather than demonstrated
- Construction traffic mitigation relies on behavioural assumptions rather than enforceable controls
- Biodiversity net gain claims depend on long-term management plans that are not yet secured

Mitigation cannot be used to mask the true scale of impacts without robust evidence.

7.5 The application does not provide sufficient detail for a 60-year DCO A 60-year operational period requires:

- Long-term management plans
- Maintenance access strategies
- Decommissioning methodologies

- Monitoring frameworks
- Landscape and ecological management over multiple decades

The application does not provide the level of detail needed to justify such a long consent period.

7.6 Requested actions LAND respectfully requests that the Examining Authority require the applicant to:

- Provide full datasets for all headline claims, including ALC mapping and cumulative scheme lists
- Resolve internal inconsistencies across the ES
- Supply a robust cumulative impact methodology and re-assess key topics accordingly
- Provide evidence-based justification for all proposed mitigation
- Submit detailed long-term management, monitoring, and decommissioning plans appropriate for a 60-year DCO

Until these issues are addressed, the application cannot be considered procedurally robust or evidentially sound.

8. Community Impacts, Rural Amenity and the Cumulative Burden on Local Residents

The Fosse Green Energy project will have significant and long-lasting effects on the communities living within and around the development area. These impacts extend far beyond visual change and encompass disruption to daily life, rural amenity, transport networks, heritage settings, and community wellbeing. When combined with the numerous other NSIPs currently proposed or under examination in Lincolnshire, the cumulative burden on local residents becomes substantial and unacceptable.

8.1 Construction impacts will be extensive, prolonged and disruptive The construction phase of a project of this scale — including the generating area, cable corridor, and new substation — will involve:

- Heavy goods vehicle (HGV) movements on rural lanes
- Noise, dust, vibration and air quality impacts
- Temporary road closures and diversions
- Construction compounds and laydown areas
- Long working hours over an extended period

For communities already facing multiple NSIPs, this represents yet another prolonged period of disruption. The applicant has not demonstrated that construction impacts have been minimised or that rural roads can safely accommodate the required traffic.

8.2 Rural amenity will be significantly diminished Residents in the affected villages value:

- Quiet rural lanes
- Open countryside
- Dark skies
- Access to footpaths and bridleways
- Agricultural landscapes

The introduction of a 60-year industrial development, with fencing, security lighting, substations, and maintenance traffic, fundamentally alters this amenity. The ES does not adequately assess:

- Loss of tranquillity
- Changes to the character of local walking routes
- Impacts on dark skies
- The cumulative erosion of rural identity

These are material considerations for the Examining Authority.

8.3 The cable corridor affects multiple communities along its length The underground cable route passes close to several villages and rural properties. Even when buried, the corridor introduces:

- Construction disturbance
- Hedgerow removal
- Footpath disruption
- Long-term access requirements
- Perceived industrialisation of the countryside

The applicant has not provided a community-level assessment of these impacts, nor has it demonstrated meaningful engagement with corridor-side residents.

8.4 Heritage settings and historic landscapes are at risk Lincolnshire's villages contain listed buildings, conservation areas, and historic rural settings that rely on open agricultural landscapes for their character. The ES does not adequately assess:

- The effect of the solar arrays on the setting of heritage assets
- The impact of the cable corridor on historic field patterns
- The cumulative effect of multiple NSIPs on heritage landscapes

Heritage impacts cannot be considered in isolation; they must be understood cumulatively.

8.5 Health and wellbeing impacts are understated The ES does not sufficiently address the wellbeing effects of:

- Long-term construction disturbance

- Loss of rural amenity
- Increased traffic on narrow lanes
- Perceived industrialisation of the local environment
- Stress and uncertainty caused by multiple overlapping NSIPs

For many residents, these impacts are not abstract — they affect daily life, mental wellbeing, and community cohesion.

8.6 The cumulative burden on Lincolnshire communities is not acknowledged

Residents in the affected area are already facing:

- Multiple solar NSIPs
- Grid reinforcement projects
- New substations
- Cable corridors
- Associated construction traffic

The applicant has not assessed how this project adds to the cumulative burden on communities who have already been required to engage with numerous consultations and examinations. This is a significant omission.

8.7 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide:

- A comprehensive community impact assessment covering all affected villages
- A cumulative assessment of community disruption across all relevant NSIPs
- A detailed construction traffic management plan suitable for rural lanes
- A full assessment of impacts on footpaths, bridleways and rural amenity
- A heritage setting assessment that considers cumulative landscape change
- Evidence-based analysis of health and wellbeing impacts

Until these issues are addressed, the community impacts of Fosse Green cannot be properly understood or assessed.

9. Environmental Risks: Drainage, Flooding, Water Environment, Biodiversity and Operational Disturbance

The Fosse Green Energy project presents a range of environmental risks that have not been fully assessed or robustly evidenced within the Environmental Statement. These risks include impacts on drainage and flood management, watercourses, biodiversity, ecological networks, and operational disturbance from noise and lighting. When combined with the cumulative effects of other NSIPs in Lincolnshire, these issues represent a significant environmental burden that has not been adequately addressed.

9.1 Drainage and flood risk assessments lack site-specific and cumulative detail

The site lies within an area characterised by agricultural drainage systems, field ditches, and watercourses that are integral to local flood management. The ES does not provide:

- Sufficient modelling of how large impermeable areas (panels, tracks, compounds) will alter runoff
- Evidence that existing drainage networks can accommodate increased flows
- Assessment of cumulative flood risk from multiple NSIPs altering hydrology in the region
- Long-term monitoring or maintenance plans for drainage infrastructure over a 60-year period

Given the increasing frequency of extreme rainfall events, the absence of robust hydrological modelling is a serious omission.

9.2 Impacts on watercourses and soil structure are understated The cable corridor and construction works involve deep trenching, soil displacement, and potential disturbance to watercourses and drainage channels. The ES does not adequately assess:

- Long-term soil compaction and reduced infiltration
- Disruption to agricultural drainage systems
- Risks of sedimentation and pollution during construction
- The cumulative effect of multiple NSIPs on local hydrology

These impacts can persist for decades and materially affect agricultural productivity and flood resilience.

9.3 Biodiversity assessments rely heavily on mitigation without demonstrating effectiveness The applicant proposes habitat creation and biodiversity net gain (BNG) measures, but:

- The effectiveness of these measures over a 60-year period is not evidenced
- The ES does not provide clear baselines for several ecological receptors
- Hedgerow removal along the cable corridor is downplayed
- Habitat fragmentation is not assessed cumulatively
- Long-term management plans are not secured or detailed

BNG cannot be assumed; it must be demonstrated.

9.4 The project contributes to fragmentation of ecological networks The generating area, fencing, security infrastructure, and cable corridor create physical and functional barriers for wildlife. The ES does not fully assess:

- Impacts on species movement
- Loss of connectivity between habitats
- Cumulative fragmentation from multiple NSIPs in the region

Lincolnshire's ecological networks are already under pressure; this project adds to that burden.

9.5 Noise, lighting and operational disturbance are under-assessed Operational impacts include:

- Inverter and substation noise
- Security lighting
- Maintenance traffic
- Disturbance to nocturnal species
- Loss of dark skies for rural communities

The ES does not provide sufficient modelling of noise propagation or lighting spill, nor does it assess cumulative operational disturbance from other nearby NSIPs.

9.6 The 60-year operational period magnifies environmental risks A six-decade lifespan means:

- Long-term soil degradation
- Permanent changes to hydrology
- Multi-generational ecological impacts
- Ongoing operational disturbance
- A need for management plans that extend far beyond typical planning horizons

The applicant has not provided the level of detail required to justify such a long consent period.

9.7 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide:

- Full hydrological modelling, including cumulative flood risk assessment
- Detailed drainage and watercourse impact analysis
- A complete ecological baseline and cumulative biodiversity assessment
- Evidence-based justification for proposed mitigation and BNG measures
- Noise and lighting modelling appropriate for a rural environment
- Long-term environmental management plans suitable for a 60-year DCO

Until these issues are addressed, the environmental risks of Fosse Green cannot be properly understood or assessed.

10. Compulsory Acquisition, Landowner Pressure and the Cumulative Burden Across Lincolnshire

The Fosse Green Energy application seeks extensive compulsory acquisition (CA) powers over land and rights across the generating area, cable corridor, and associated infrastructure. While CA is permitted under the Planning Act 2008, it must only be granted where the applicant demonstrates a **clear, compelling case in the public interest**, and where the extent of land sought is **necessary and proportionate**.

LAND submits that the approach taken to land acquisition for Fosse Green — when viewed alongside the numerous other NSIPs in Lincolnshire also seeking CA powers — places an unacceptable cumulative burden on landowners, tenants, and rural communities. This burden includes significant stress, uncertainty, and pressure on individuals who are repeatedly told that failure to agree voluntarily will result in compulsory purchase regardless.

10.1 The scale of CA powers sought is extensive and long-lasting The applicant seeks powers to acquire:

- Freehold land
- Permanent rights
- Temporary possession
- Access rights
- Rights for the cable corridor
- Rights associated with the new substation

Given the 60-year operational period, these powers represent a multi-generational imposition on landowners and tenants.

10.2 Landowners face significant pressure to agree voluntarily under threat of CA Across multiple NSIPs in Lincolnshire, landowners report being told that:

- “If you don’t sign voluntarily, it will be compulsory anyway.”
- “You may as well agree now to avoid worse terms later.”
- “The DCO will give us the powers regardless.”

While such statements may reflect the legal reality of CA powers, they create a climate of **pressure, fear, and inevitability** that undermines the principle of voluntary negotiation.

The Examining Authority cannot adjudicate on negotiation tactics, but it **can** consider whether the applicant has demonstrated:

- Good-faith engagement
- Proportionate use of CA powers
- Genuine attempts to minimise land-take
- Respect for the rights and wellbeing of affected individuals

LAND submits that these tests have not been met.

10.3 The cumulative burden of CA across Lincolnshire is unprecedented Fosse Green is not an isolated case. Multiple NSIPs across the county — solar farms, grid reinforcements, substations, and cable corridors — are simultaneously seeking compulsory acquisition powers. This creates:

- Repeated pressure on the same landowners
- Overlapping negotiations
- Conflicting access demands
- Long-term uncertainty about land use
- A sense of being “surrounded” by infrastructure proposals

The cumulative effect is **material**, even if each individual scheme claims its CA powers are justified.

10.4 The psychological and wellbeing impacts on landowners are real and significant The ES does not address the human consequences of CA, including:

- Stress and anxiety caused by prolonged uncertainty
- Fear of losing family land or livelihoods
- Strain on farming businesses already under pressure
- Mental health impacts associated with repeated NSIP engagement
- The emotional toll of facing compulsory purchase for the first time in a generation

These impacts are not abstract. They affect real people, many of whom have lived and farmed in the area for decades.

10.5 The applicant has not demonstrated that CA powers are necessary or proportionate LAND submits that:

- The extent of land sought is greater than necessary
- Alternatives have not been fully explored
- The cable corridor alignment has not been justified
- The applicant has not demonstrated that voluntary agreements were pursued in good faith
- The cumulative CA burden across Lincolnshire has not been assessed

Without this evidence, the “compelling case in the public interest” test is not met.

10.6 Requested actions LAND respectfully requests that the Examining Authority require the applicant to:

- Provide evidence of good-faith negotiation with landowners
- Justify the extent of land and rights sought
- Demonstrate that CA powers are necessary and proportionate
- Assess the cumulative CA burden across Lincolnshire
- Provide a wellbeing impact assessment for affected landowners
- Explain how long-term uncertainty will be minimised

Until these issues are addressed, the compulsory acquisition case for Fosse Green cannot be considered robust or justified.

Closing Summary

Lincolnshire Against Needless Destruction (LAND) submits that the Fosse Green Energy Development Consent Order cannot be recommended for approval in its current form. The proposal presents significant, long-term, and inadequately assessed impacts on agricultural land, rural landscapes, community wellbeing, environmental resilience, and the rights of landowners. These impacts are not isolated. They form part of a wider pattern of large-scale energy and infrastructure proposals that are placing an unprecedented cumulative burden on Lincolnshire's people, land, and rural identity.

Across the Environmental Statement and supporting documents, the applicant has not demonstrated:

- That agricultural land impacts have been minimised or justified
- That landscape and rural character effects have been properly assessed
- That the grid connection corridor and new substation have been evaluated in full
- That consultation has been meaningful, accessible, or proportionate
- That alternatives and site selection have been robustly considered
- That the evidence base is complete, consistent, or procedurally sound
- That community impacts have been fully understood or mitigated
- That environmental risks have been modelled with sufficient detail
- That compulsory acquisition powers are necessary, proportionate, or justified

The proposal seeks a **60-year operational period**, effectively removing productive agricultural land and altering rural landscapes for the majority of a human lifetime. This long-term industrialisation of the countryside cannot be considered “temporary” in any meaningful planning sense.

Furthermore, the cumulative context is critical. Lincolnshire is currently facing multiple NSIPs — solar farms, grid reinforcements, substations, and cable corridors — each seeking land, each requiring consultation, each imposing construction disruption, and many seeking compulsory acquisition powers. The combined effect is a level of pressure on communities, landowners, and local authorities that is not being acknowledged or assessed within the Fosse Green application.

LAND does not oppose renewable energy. It opposes **poorly planned, disproportionately located, and insufficiently justified** schemes that fail to respect the county's agricultural importance, rural character, and community wellbeing. Fosse Green, as currently proposed, falls into this category.

LAND therefore respectfully submits that the Examining Authority should:

- Require substantial further information and assessment
- Scrutinise the necessity and proportionality of compulsory acquisition powers

- Consider the cumulative burden on Lincolnshire as a material factor
- Apply the tests of NPS EN-1 and EN-3 rigorously and transparently
- Give significant weight to agricultural land protection, rural amenity, and community impacts

Unless and until the applicant can demonstrate a compelling case in the public interest — supported by complete, consistent, and robust evidence — the Development Consent Order should not be granted.

Regards

Cat Makinson

On behalf of Lincolnshire Against Needless Destruction