

FOSSE GREEN ENERGY EXAMINATION

COMMENTS ON LINCOLNSHIRE COUNTY COUNCIL'S LOCAL IMPACT REPORT

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I am a resident of Bassingham and wish to make the following comments on Lincolnshire County Council's Local Impact Report (LIR).

1. Site Selection and Alternatives

Paragraph 7.19 of the LIR raises the Council's concerns regarding the applicant's site selection process in terms of the acknowledged starting point of landowner willingness, the preference for a contiguous site and the drive to avoid the need for compulsory acquisition. The Council is concerned to ensure that the site selection process is in line with EIA Regulations and policy requirements, rather than being a 'retrofit' exercise to align with landowner aspirations.

Paragraph 7.8 references the Site Selection Report (Appendix A to the Planning Statement – document AS-098) noting that the starting point for the selection of the site was the offer of land from a group of landowners (paragraph 2.3.1), rather than the applicant's contention that the selection of the site was '*driven by the availability of land and site suitability as well as available capacity in the transmission network and a grid connection.*' The LIR goes on to describe the site selection process articulated in the Site Selection Report in paragraphs 7.9 to 7.15, pointing out various issues with the robustness of the approach that the applicant has taken.

I concur with the LIR on these points, and offer the following comments to further support the Council's assessment of the site selection process:

- a) The initial selection of the site was clearly as a result of the approach from the landowners. It was not driven by a search for sites that would utilise the types of land that paras 2.10.29 and 2.10.31 of NPS EN-3¹ prioritise for solar deployment (brownfield, previously developed, contaminated and industrial land), or sites that could achieve a connection to the existing grid infrastructure, as prioritised by para 2.10.25 of NPS EN-3¹. 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.
- b) The Site Selection Report clearly represents a retrospective justification for the selection of the site based on a search for 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. There is no evidence that National Grid was already considering Navenby as a strategic location for a new substation on the national electricity network.
- c) The Site Selection Report outlines a search process that focuses on identifying a site of 1,000ha, but provides no clear rationale for taking this as the starting point. At ISH1, the applicant indicated a requirement for around 450ha for the energy generation hectareage. Logically, this should have been the starting point for the site search, accepting that larger sites than this would need to be considered to accommodate mitigation measures. The starting point of 1,000ha seems to have been more to do with justifying the selection of the Fosse Green Energy site, than a genuine attempt to

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find the most suitable site for 450ha of energy generation hectarage within the 15km radius of the proposed Navenby substation.

2. Grid Connection

Paragraph 8.1. states the Council's view that a crucial aspect of the Fosse Green Energy proposal is ensuring certainty about a grid connection. The LIR notes that there is no available existing grid connection and that the project relies on connection to a new substation proposed by National Grid at Navenby, which has yet to come forward as a planning application.

In paragraph 8.5 the Council rejects the applicant's assertion that there are no identified reasons why the planning application for the proposed Navenby substation might be refused, viewing the applicant's claims as *'high level comments that are not considered to provide sufficient evidence that there are no obvious reasons why the Navenby substation application would not be refused, as required by paragraph 4.11.8 of NPS EN-1.'*

I concur with the LIR on these points, but believe that the Council could be more robust in its comments about the Navenby substation. Approval of the substation will be key to the cumulative impacts of all the renewable energy infrastructure projects that are looking to connect to it. 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. I believe that the Council should be clearer on whether in its view the proposed Navenby substation is consistent with national and local planning policy for solar deployment, and the likelihood therefore of the planning application being approved by NKDC or the Planning Inspectorate at appeal. This would give the ExA much clearer guidance on this issue.

As I stated in the Written Representation that I submitted at Deadline 1, I believe that the Navenby substation proposal is contrary to almost all of the relevant planning policies in the Central Lincolnshire Local Plan, most significantly in terms of the cumulative harms that will result from the significant number of renewable energy projects that its approval will support. I also contend that the Navenby substation proposal is contrary to NPS EN-3² as it cannot support solar farm developments on the types of land that paragraphs 2.10.29 and 2.10.31 prioritise for solar deployment – brownfield, previously developed, contaminated and industrial land. 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.

The uncertainty regarding the likely approval of the Navenby substation casts doubt on the deliverability of the Fosse Green Energy solar farm proposal. The Council's proposal at paragraph 8.9 that a condition should be applied to the DCO consent barring the commencement of the Fosse Green Energy development until such time as planning permission has been secured for the Navenby substation, does not represent a robust way forward in determining the DCO application, as planning permission may never be secured.

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The uncertainty thus remains a material consideration for the ExA. The fact also remains that there was no existing or proposed substation that could provide a POC for the Fosse Green Energy scheme at the time when the site was initially selected in response to the approach from the landowners.

3. Landscape and Visual Impact

Paragraph 9.16 of the LIR states that *'by reason of its mass and scale, the Fosse Green Energy development would lead to Significant adverse effects on the landscape character and visual amenity at all main phases of the scheme 'and that 'the development has the potential to transform the local landscape by altering its character on a large scale across an extensive area'*. I wholeheartedly agree with this assessment.

4. Public Rights of Way

Paragraph 12.11 concludes that *'the overall effect on the PRoW network in the area is considered to be **negative**.*' I fully support this conclusion, but believe that the LIR should be more critical of the design of the Fosse Green Energy scheme insofar as it impacts the PRoW network. Para 2.10.43 of NPS EN-3 encourages solar farm applicants *'where possible to minimise the visual impacts of the development for those using existing public rights of way'*. Para 2.10.44 states that *'applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way'*. I maintain that the Fosse Green Energy scheme will have a significant detrimental impact on a number of promoted walks in the area, including the Stepping Out walk around Thorpe-on-the-Hill and the Aubourn and Bassingham Long Walk between Bassingham and Aubourn, which could have been significantly reduced with a more careful design approach and genuine attempts to mitigate the impacts and enhance these walking routes.

5. Socio-Economics – Visitor Economy

The LIR raises concerns in paragraphs 16.12 to 16.17 about the potential negative impacts of the Fosse Green Energy proposal on the visitor economy. I was formerly one of the leading tourism consultants in the UK. I have been involved in supporting the development of Lincolnshire's visitor economy for over 35 years. Based on my experience, I am concerned that the LIR fails to fully understand the likely impacts of the Fosse Green Energy project on the area's visitor economy. I have submitted separate comments on this matter, setting out my expert views.

6. Cumulative Effects

Paragraph 9.21 of the LIR expresses concerns that *'the scale and extent of existing and potential future energy developments across the district and region are likely to lead to a more transformative impact than the applicant suggests.'*

Paragraph 19.18 of the LIR states that *'the potential for significant inter-project effects to arise from the Fosse Green Energy development in combination with other developments is of particular concern, and as such the Council's position on cumulative impacts in the overall balance is negative'*.

I fully agree with these points. Accurately determining the likely cumulative effects of consenting the Fosse Green Energy proposal requires a thorough assessment of all of the renewable energy projects that are seeking a grid connection through the proposed substation at Navenby. It is currently unclear exactly what projects are proposed. In its pre-examination submission, National Grid states that seven generation projects are seeking to connect to the Navenby substation. This if a further four projects in addition to the already announced Fosse Green Energy, Springwell and Leoda solar farm projects. Full information is

needed on these additional generation projects. The proposed Navenby and Coleby (Brant) BESS projects are also seeking to connect to the Navenby substation, so need to be factored in. A BESS has also been mooted for a site at Wellingore, and there may be other BESS proposals in the area.