

WRITTEN RESPONSE TO THE EXAMINER, PLANNING INSPECTORATE

RE: APPLICATION BY FOSSE GREEN ENERGY LIMITED – EN010154

SUBMISSION FROM THERESA BREWER

IN RESPECT OF: ISSUE SPECIFIC HEARING 3

CONTENTS

3.2 LANDSCAPE & VISUAL EFFECTS

3.2 a Methodology Assessment Page 2

3.2 a Mitigation Page 2

3.2 a Cumulative Effects Page 2

3.2 a Permanent versus Temporary Page 3

3.2 b Landscape and Visual Effects for Residents Page 3

3.2 b Landscape and Visual Effects for Users of ProWs Page 4

3.2 b Landscape and Visual Effects for Non-motorised User Routes Page 4

3.3 POPULATION EFFECTS

3.3 a Methodology for Assessing Effects on Human Health and Wellbeing Page 5

3.3 c Effects of the Nature and Scale of Change on Health and Wellbeing Page 5

OVERALL PERSPECTIVE Page 6

ORAL SUBMISSION MADE AT OPEN FLOOR HEARING Page 7

3.2 a Methodology Assessment

The NPPF and National Policy Statement for Energy EN -1 have a requirement for a balancing exercise to take place, and this is emphasised in CLLP Policy S5 and CLLP Policy S16.

Part E of CLLP Policy S5 relates to Non-residential development in the countryside and states that proposals for such will be supported with provisos, the final one being:

d) The development is of a size and scale commensurate with the proposed use and with the rural character of the location.

The site of the proposed development is not commensurate with the area, which is a habited rural area. It is not an industrialised or previously industrialised area as recommended in EN-1, nor is it a remote rural area with virtually no inhabitants which would therefore cause little effect on residents.

This I would suggest is a straightforward method of assessing the overall effect of the proposed development.

3.2 a Mitigation

The Applicant claims that 181 hectares of arable land within the Order Limits will be retained, including 116 hectares of Grade 3a BMV land, and further stating that this is evidence that agricultural impacts have been minimised.

However, the agricultural baseline conditions have changed with the solar development area, as it sits within a landscape altered by panels and fencing, infrastructure and cabling, and a long-term change of character.

Central Lincolnshire LP Policy S16 states that 'proposals should take all reasonable opportunities to mitigate any harm arising ... and take care to select not only appropriate locations for such facilities, but also design solutions (see Policy S53) which minimises harm arising.

A major mitigation action and design solution would have been to not have so many solar panels close to the village of, and in the parish of Thorpe on the Hill, and also not around the PRoWs in that vicinity that have a direct effect on residents, but also visitors to the adjacent Whisby Nature Park.

3.2 a Cumulative Effects

Following on from the above, there is then a knock-on cumulative effect that affects Thorpe on the Hill in particular - extensive concentration of solar panels in the parish of Thorpe on the Hill, being on a hillside, will affect a wide landscape, many vistas will change to an industrialised presence of panels, fencing and lighting. The local PRoWs will become restricted visual corridors of industrial components. Any mitigation of hedgerows and trees will take a decade to make any significant presence, and will not then disguise any infrastructure, and even that relies on dedicated and constant maintenance taking place.

This application would result in a highly obtrusive and discordant form of development and would result in significant harm to the landscape. Moreover, through the scale and prominence of the proposed infrastructure, the Proposed Development will have the cumulative effect of undermining the experience and appreciation of nature and the great outdoors experience.

In the Response to Written Representations the Applicant concludes that there would be 'no notable difference' between the effects of the proposed development alone and the cumulative effects when considered alongside other schemes. However, it appears that this conclusion rests largely on the distance between schemes, the lack of intervisibility and Reports that were prepared for other solar NSIPs.

The information may all be technically correct, however, the strategy is very narrow.

The focus is on direct combined effects between the schemes named, or overlapping visual envelopes, and does not address the broader question: whether the clustering of multiple large-scale solar NSIPs across a rural area of North Kesteven changes the strategic character of the landscape over time. The analysis is not landscape-transition based, it is project-to-project based.

Finally, any calculations from the Applicant of cumulative effect should be based on the local area, not figures for Lincolnshire (as they supplied), these are not reflective of the real cumulative impact in planning terms.

The Applicant claims that this application is temporary, however the planning question is not solely about this term from a legal perspective. It is the weight and balance from a planning perspective that should be attributed to its effects during its operational life of 60 years, and the decommissioning aspect.

And to put that into perspective, someone just now turned 16 years old, will be 20 years old in 2030 when the Applicant hopes to begin works, so 60 years on at the end of the lifetime of the development, that 16 year old will be in his early 80's. All his adult life will have been dominated by the effects of the development – that is not a temporary situation. The Applicant is not engaging with that lived reality, there is a distinction between legal temporariness and practical permanence which remains unresolved.

In response to the ExA on permanent BMV loss (FS.1.08), the Applicant states that the ES treats planting as 'permanent loss' because it will be removed at decommissioning. It then states this loss is 'not permanent in the sense of the word' because a landowner could reinstate it. Firstly, this suggests the ExA should treat the 'permanent loss' figure as uncertain, and therefore weakens the Applicant's claim to clarity and robust assessment. Secondly, removal of planting totally relies on a Felling Licence to be able to remove more than 5 cubic metres of trees, which could likely be a contentious issue in the future, the same as it would be at this point in time.

It then also argues that a community orchard, part of the 'permanent loss' is 'unequivocally still an agricultural use' and therefore 'not strictly lost'. However, it may be classed as agricultural in planning terms in respect of business rates, or other financial benefits for the landowner or Applicant, however, in practical terms it is not continuing as land being farmed commercially growing crops for the nation, be it for food, animal feed or biomass crops. It is a 'community' facility for a relatively small residential area, part of an offset by the Applicant, not an agricultural business per se.

There are differing characterisations being used which are conflicting, and the 'permanent loss' figure is surely uncertain, there is no clarity, and the assessment does not appear to be robust.

The Applicant is also relying heavily on the concept of reversibility at decommissioning – the weight of the long-term operational impact must be assessed and balanced against benefit of the proposed development.

The argument is contingent on confidence in future decommissioning enforcement and soil restoration. The Applicant is relying on future compliance rather than on present impact magnitude. Where is the evidence that a BESS site can be returned to productive arable land?

In FS.1.09 the applicant claims that there is evidence of this, citing where pipelines or cables have been buried and then the soil has been reinstated. We have not long ago seen this in the area of the Cliff villages, when the Elsham to Lincoln Anglian Water pipeline was being installed. I did not take note then the exact amount of time works took place over, possibly a year, but it was obviously nothing like 60 years, and the type of work was digging trenches, installing pipes, then infilling the trench. The land was able to be ploughed immediately after this work had finished.

All this is a completely different scenario to working on the whole of a field, all the vehicles and people installing cables under that field, then the large vehicles installing the infrastructure that supports the panels, and finally installing the panels themselves. And then this above ground infrastructure being replaced in 30 years time, that then being in place for at least 60 years, shading the land underneath. The Applicants evidence is not applicable or comparable.

But the end thought on this is will the landscape character of the area need to be re-assessed if the project goes ahead? Is 60 years too long to have misleading and incorrect information in various official documents regarding the area, even though it is purported to be a temporary change?

3.2 b Landscape and Visual Effects for Residents

The importance of the Landscape is that it appeals to the senses, primarily the visual sense, the differing views depending which way you look, seeing different trees, or buildings, maybe something in the distance (like Lincoln Cathedral). These qualities of the local landscape next to your village or those that are nearby, are what gives the landscape a high value to residents. In some areas it will be the wildness and tranquillity, and the dark skies, and the wildlife that favours particular fields, hedgerows or trees.

The effect on residents within the developed footprint and beyond will be major, it covers such a wide area that it will be difficult to travel anywhere in the vicinity without coming across some part of the development.

The infrastructure – panels, fencing, lighting, BESS, sub-station – all these are industrial components, the area will become industrialised, which is not the type of area that the residents chose to live in. This is bound to have a detrimental effect on residents when the choice is not within their control, and there may be many boundaries that prevent them moving elsewhere. There will then be an effect on mental health, as well as other aspects of physical wellbeing.

3.2 b Landscape and Visual Effects for Users of PROWs

Public Rights of Way (PROWs), are a landscape feature and their importance is relative to what surrounds them now, major changes particularly industrialisation will remove their crucial benefits, which in turn removes many beneficial effects of the PROWs.

Public Rights of Way in the countryside are important and valued routes to enable seeing the local area. If you live in an urban area you can walk around all the streets in your locality, it is more restricted in rural areas as many roads do not have footpaths by the side of them, and so real access to walking and the countryside is on PROWs.

PROWs can be an easy and welcome break from your home, without having to get the car out or not travel very far in it. For some it will be a necessity for walking the dog, or for general wellbeing, and sometimes recovering from medical problems. The benefit of that experience relates to the surrounding scenes – of the countryside and nature - this is very important, and should not be minimalised (as has been by the Applicant) just because it is not classed as an outstanding view, or something exceptional and highly sought after. There are very few ‘bucket list’ or ‘box ticking’ types of views, so to class other more common views as insignificant is a blinkered viewpoint, and is not what planning rules are based on either.

If an outstanding view was being affected, then it should be afforded exceptional exemption, however that does not mean that any normal or common view, is of less worth to local residents and also visitors. They may not afford an exceptional status but that does not mean the value of their status should be automatically reduced to minimal insignificance. The views across the whole of the footprint of the proposed development is a typical rural scene within this part of Lincolnshire – and that is its massive value.

The importance and value of PROWs is greatly appreciated by residents, as well as visitors, as they are also a crucial means to connecting with nature, the open countryside, keeping fit and healthy, improving mental health and general wellbeing,

In rural areas, the expectation will be that walking a PROW will result in an experience commensurate with being in the countryside, being in a rural area. The visit will not fulfil expectations if the fields contain solar panels, fencing, lighting, and electrical substation infrastructure.

3.2 b Landscape and Visual Effects for Non-motorised User Routes

Cyclists who live in the urban areas to the south of the centre of Lincoln, Boultham, Bracebridge, Swallow Beck, Bracebridge Heath and North Hykeham, and who want to escape and ride in the countryside, can find an easy and safe route by joining the cycle path along Newark Road, and which continues alongside the A46 from the current ring road end to go south.

Cyclists usually choose to ride a circular route and finish with a tail wind if possible, so starting from the above areas, and continuing beside the A46 you would usually turn off at the Aubourn/Haddington exit, cross over the bridge and travel east to Thorpe on the Hill. This is because the prevailing winds are west and southwest.

There is a very popular cycle shop and café at Doddington Hall, which is a few miles north of Thorpe on the Hill, as well as a Cycling Club based there. Near the Hall there is access to the National Cycle Network Route 64, which runs from Market Harborough to Lincoln.

If cyclists had turned west from the A46, instead of going to Thorpe on the Hill, they would have travelled to Aubourn/Haddington, or to Thurlby and Bassingham.

If cyclists had continued on the A46 further south than the Aubourn / Thorpe bridge, then they would get to the end of the cycle path, and would then have two choices. To either turn east to Swinderby and Morton, or go west towards Witham St Hughs and Carlton le Moorland.

What you will note is that all the above villages are within the developed footprint of the FGE project. The changes to the landscape will affect the cycling experience in the same way as it will with walkers, the benefit of the experience is being in a rural area of countryside and getting away from industrial or commercialised areas, as well as riding on quieter country lanes. Another problem will be that during the construction period the associated traffic will increase, which will adversely affect the appeal of cycling in that area, and may disrupt the possibility of rides at all.

In summary, cycling routes from the south of the city in a wide area, spreading east and west, will be adversely affected by this development, and in some aspects – permanently.

Item 3.3 Population Effects

3.3 a Methodology for Assessing Effects on Human Health and Wellbeing

Nearby to Thorpe on the Hill is Doddington Hall, whose estate has a nature recovery scheme called Wilder Connections, and when they announced this scheme and its funding in July 2024 they revealed some of their research leading up to this point.

This included the fact that Lincolnshire’s population scores second from bottom for access to nature out of all the counties in England (this info came from the Gov Statistics, Monitor Engagement Natural Environment 2018-2019).

Meanwhile the Green Spaces Index indicates that Lincoln and surrounding areas do not meet the minimum standard of provision for green space in the UK. Evidence shows poorer communities and marginalised groups have less access to nature than more affluent ones (this is quoted in the Monitor Engagement report mentioned above).

Another quoted document from the Doddington Hall research was the National Library of Medicine, a report dated 30Apr21, headed ‘Associations between Nature Exposure and Health: A review of the Evidence’.

We found evidence for associations between nature exposure and improved cognitive function, brain activity, blood pressure, mental health, physical activity, and sleep. Results from experimental studies provide evidence of protective effects of exposure to natural environments on mental health outcomes and cognitive function. Cross-sectional observational studies provide evidence of positive associations between nature exposure and increased levels of physical activity and decreased risk of cardiovascular disease, and longitudinal observational studies are beginning to assess long-term effects of nature exposure on depression, anxiety, cognitive function, and chronic disease.

There are swathes of residential areas south and west of Lincoln, as mentioned at the start of 3.2 b, and as there is evidence of a lack of green spaces in the urban areas, then those wishing to visit the countryside will likely visit the nearest areas. Which would be unfortunate if the development is allowed, as that area will be industrialised with solar panels and infrastructure.

As there is evidence of green spaces and exposure to nature being beneficial, then there must be a reverse situation, that is, removing exposure to nature by industrialising a rural area will surely have a negative effect on mental health as well as many other aspects of physical wellbeing.

3.3 c Effects of the Nature and Scale of Change on Health and Wellbeing

Based on the evidence quoted in the previous section, the effects of the nature and scale of change to the health and wellbeing of residents will be extensive but also varied.

A negative impact on mental health will happen to those who find they cannot cope with the type of changes happening near their homes by the proposed development, and also the scale of it all, the area in the locality that it covers. Anxiety, depression and stress affect sleep patterns, this can lead to less physical activity being pursued, which all becomes a vicious circle and problems get worse.

So, people who find themselves in this situation and go to their GP to seek advice may well now receive ‘Green social prescribing’. This connects people to nature-based activities—such as community gardening, walking, and conservation—to improve mental wellbeing. NHS Link Workers and GPs refer patients to these non-clinical, local, outdoor initiatives to reduce anxiety, stress, and social isolation.

However, those residents living within the footprint of the proposed development will not have access to nature and the countryside views to improve their wellbeing. This will affect some areas more than others, Thorpe on the Hill

with the quantity and close proximity of the solar panels will be an example of the worst-case scenario. But this will also affect the wider area of adjoining villages.

The extensive construction period, can cause a range of physical and mental health consequences, primarily driven by air pollution, traffic-related noise, and environmental disruptions during construction and operational phases. It often disproportionately affects the health of nearby residents, particularly through increased respiratory, cardiovascular, and mental health issues. (This was found on the website of National Library of Medicine).

It also states that studies on large infrastructure projects, such as urban motorways, have documented significant reductions in mental wellbeing over time for nearby residents. This is often caused by noise pollution, loss of green space, and visual intrusion. The noise pollution from this proposed development, may in some areas only be during the construction phase, however, this is still an extensive time period. The loss of green space and the visual intrusion is permanent.

The research also states that chronic, long-term exposure to operational emissions leads to more severe impacts than temporary construction noise. And that the impact is often more severe for vulnerable groups, including children, the elderly, and individuals with existing chronic conditions.

The paper also states that conversely, investment in green infrastructure (parks, wetlands) has been shown to improve mental wellbeing, increase physical activity, and reduce mortality rates in urban areas. So, I make the point again that removing the green spaces, the fields of arable farmland, from an area will have a detrimental effect on the wellbeing and physical health of residents.

OVERALL PERSPECTIVE

The NPPF and National Policy Statement for Energy EN -1 have a requirement for a balancing exercise under section 38(6) of the PCPA with careful consideration to be given to the harm which may arise, both individually and cumulatively.

The huge change in the landscape and the cumulative effects should be fully recognised, whilst also taking into account the loss of productive arable farmland, including BMV land, contrary to EN-3 advice.

But apart from that, Food Security is a priority of the Government, in July 2025 a Policy Paper was published headed: A UK government food strategy for England, considering the wider UK food system. The Ministerial Forward finishes with these words:

We want everyone to enjoy healthy, delicious British food. We want to support our food workers, grow the economy, and build a fairer future. By creating a better food system, we can make sure everyone benefits from and celebrates the best of British food.

Continually taking productive arable farmland out of the food chain, is counterproductive to this policy.

Visual harm to the landscape, heritage assets and Public Right of Ways, plus the loss of BMV and productive farmland, do conflict with a number of policies made at national and local levels, as already mentioned by Dr Caroline Johnson and Cllr Marianne Overton whose comments I endorse.

Weight should be given to the detrimental effect this will have, industrialisation of the area, the loss of productive arable farmland affecting national food security, the loss of arable farmland producing crops for animal feed or biomass energy plants.

Cumulative impact is of serious concern, the proposed Navenby Sub Station and those potential projects wishing to connect to it, are all on BMV and productive farmland, and all in rural locations.

The other projects in the vicinity are Springwell Solar, Navenby BESS, Coleby BESS, and Leoda Solar – the relative close proximity of these developments will change a massive area of the District, with knock on impacts in many ways, like traffic problems over the many years of construction.

‘Temporary’ is a favourite word of the Applicant, for example saying that agricultural land is only temporarily unavailable for 60 years. They rely on an assumption of reversibility being achieved.

Turning the fields of solar panels, or banded areas of BESS back to quality productive farmland. Where is the evidence for this? Where are those fields in this country where once stood a solar farm on productive farmland many years ago? Where are there any ex-industrial sites in this country where the land is now arable productive farmland? I could find many that are nature reserves, sporting venues, even residential.

Which makes sense, as the definition of greenfield land is land that has yet to be developed, therefore once there has been a solar farm or BESS, it has been developed, and it is then classed at best brownfield land, or at worst – a toxic wasteland.

And how can it be temporary, if all the cabling and underground infrastructure is being left there, as well as the sub-station?

And the fire in Glasgow on Sunday is opportune to remind the huge concerns over the proposed large presence of BESS.

To put in perspective - someone just now turned 16 years old, will be 20 years old in 2030 when the Applicant hopes to begin works, so 60 years on at the end of the lifetime of the development, that 16 year old will be in his early 80's. This 16 year old, not old enough to vote, may never see the decommissioning stage. All his adult life will have been dominated by the effects of the development – that is not a temporary situation.

Public Rights of Way have been mentioned at this afternoon's hearing, but I wish to draw attention to cycling.

The close proximity of Lincoln City and North Hykeham and therefore intense residential developments in the south and west, means that leisure cyclists can use the dedicated cycle path to access the bridge over the A46 and then get to quieter country roads. Thorpe on the Hill is a popular route, it is also a route through to Doddington Hall with a cycle shop and café, and then access to the National Cycle Network Route 64.

The dedicated cycle path by the side of the A46 carries on further south, after the Aubourn/Thorpe on the Hill bridge, as far as Swinderby roundabout. Again the cyclist can currently access quieter country roads from here either west to Witham St Hughs, Carlton le Moorland and Bassingham, and east to Swinderby and Morton. Villages that will all be affected by this proposed development, spoiling not only the cycling in the countryside experience when the works are completed, but disrupting the possibility of rides during the years of construction.