Application for DCO by FOSSE GREEN
Representation by Interested Party reference [redacted]
Deadline 4

Summary of Submissions

The submission is divided into sections as follows:-
A Procedural Issue
B Comments on REP3-045- Applicant's response to ExQ2:-
DCO.2.28 Requirement 20 and funding for decommissioning
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PE.2.02 Mental Health
TT.2.02 Use of PRoWs affected by the proposed development
C Comments on Technical Note for the proposed National Grid Substation near Navenby REP3-046

Section A Procedural Issue

1.0 I requested an extension of the time between the closing dates for Deadline 3 and Deadline 4 submissions as there were only 5 working days between these deadlines (PDA-009). In response the ExA separated Deadline 3 into Deadlines 3 and 3A, bringing forward Deadline 3 to Friday 20 March 2026 with Deadline 3A remaining at 24 March 2026 (PD-0010). This was to allow additional time for the parties to review documents.

1.2 The Deadline 3 submissions were published at 5.32 pm on 24 March 2026 and the Deadline 3A submissions at 6.29 pm on 26 March 2026. This allows only 5 working days for parties to review and respond to the Deadline 3 submissions and 3 working days to review and respond to the Deadline 3A submissions by Deadline 4 on 31 March 2026.

1.3 This timeframe is inadequate for me to review and fully respond to hundreds of pages of technical documents that have been submitted at Deadlines 3 and 3A. I am therefore submitting some comments on Deadline 3 submissions now but intend to submit at Deadline 5, any further comments that I may have on the Deadline 3 and 3A submissions.

Section B Comments on REP3-045- Applicant's response to ExQ2

DCO.2.28 Requirement 20 and funding for decommissioning

2.1 Applicant's response
The amount included for decommissioning at this stage is 3 pence per watt.

2.2 Comments in reply

Amount of decommissioning costs
2.2.1 The Applicant has included an amount of 3 pence per watt as the decommissioning costs. It is assumed that the "watt" relates to the grid connection capacity of 240MW of the

proposed development (paragraph 5.3.3 of REP2-033 refers). This gives a total figure of £7.2M or £30,000 per MW. The Applicant has not explained how it has produced this figure but coincidentally Google AI suggests that decommissioning costs may range from £30,000 to £50,000 per MW so it may be the case the Applicant has used the lower end of the range of costs estimates. The Applicant pointed out in its response to RR-222 at REP1-047 regarding estimates of decommissioning costs that, "given the timeframe (60+years) any such estimate is likely to carry significant assumptions and limitations whereby advancements in technology by the late 21st century have the potential to significantly affect costs estimates". It is surprising then that the Applicant is now able to assert that the decommissioning costs will be £7.2M.

Funding Statement

2.2.2 The capital cost of the proposed development was originally stated to be £340M and did not include the decommissioning costs (the Applicants response to RR-222 at REP1-047 page 352 refers). The Funding Statement has since been amended to state that decommissioning costs **are** included in the capital cost (REP2-009) even though the amount of the capital costs remain the same. The capital amount in the Funding Statement should therefore be amended to reflect the amount of the decommissioning costs now provided by the Applicant.

2.2.3 Paragraph 17 of the "Guidance related to procedures for the compulsory acquisition of land" DCLG Sept 2013 says that the funding statement "should provide as much information as possible about the resource implications of both acquiring the land and implementing the project for which the land is required". The funding statement should therefore show that the project is viable. As the project for the proposed development includes decommissioning, the Funding Statement should identify how those costs will be met. For example, paragraph 2.2.1 of the Funding Statement for Tillbridge Solar states that decommissioning costs will be covered by an agreement with the landowner to create a form of security to ensure that there are funds available for decommissioning. In Oaklands DCO the Funding Statement (APP-020) stated that the pre-application costs had been funded from the applicant's balance sheet and that "this model will continue to apply through the DCO determination period, construction, operation and ultimately decommissioning of the Proposed Development". As the Applicant has stated that the decommissioning costs will be accrued over the lifetime of the proposed development, the Funding Statement should be amended to reflect this.

2.2.4 If, as the Applicant proposes, the decommissioning costs of £7.2M will be accrued over the lifetime of the proposed development, there needs to be a mechanism for reviewing the amount of the funds which have been set aside, given the uncertainty of the accuracy of the estimate and these details should also be included in the Funding Statement and this should be made an enforceable provision in the DCO.

FS.2.02 Temporary and Permanent loss of agricultural land

3.1 Applicant's response

The Applicant is not aware of other solar NSIPs including areas of built "hard" infrastructure (access roads, compounds, BESS, substations) within the calculation of land permanently lost, except where an applicant is not proposing to decommission these works.

3.2 Comments in reply

3.2.1 It would appear that the Applicant has not read my Deadline 1 submission (REP1-106) which sets out examples of other solar NSIPs where areas of hard infrastructure were determined to be permanently lost and where the applicant was proposing to decommission these works. This includes Mallards Pass, the Applicant's own development. An extract of my submission is set out below:-

"Mallard Pass – this was a 60 year time limited consent although the EIA was originally carried out on the basis that the proposed development would be permanent (paragraph 4.9 to 4.17 of the SoS Decision letter). The Applicant subsequently advised that the 60 year time limit did not alter the conclusions in Chapter 12 of the ES (paragraph 3.7.96 of the Recommendation Report refers). Table 12-4 of Chapter 12 Land Use and Soils (APP-042) states that the areas of access tracks and solar stations on the site amounts to 8 ha. Paragraph 12.4.16 acknowledged that these areas will be treated as permanently sealed over. It was accepted in paragraph 12.4.20 that even though the outline Decommissioning and Environmental Management Plan required the solar station and tracks to be restored to agricultural use at the end of the operational phase, "it is assumed that restoration may not be back to comparable quality, at least initially, following decommissioning". The onsite substation containing 6.4 ha (Table 12-5 refers) was also considered as permanently sealed over for the same reasons as the access tracks and solar stations. Of the 14.4ha of agricultural land affected by the substation, access tracks and solar stations, 4.2ha was BMV land (Table 1 of the ExA Recommendation Report refers).

Heckington Fen -this was a 40 year time limited consent. Paragraph 16.6.30 Chapter 16 Land Use and Agriculture (APP-069) states "only those areas of land proposed for the fixed equipment and substations, should be treated as sealed-over or irreversibly lost. The final Construction Management plans can require those areas to be restored to agricultural use at the end of the operational phase, but a cautious approach is taken in this ES and it is assumed that restoration may not be back to comparable quality, at least initially, following decommissioning". Paragraph 3.6.42 of the ExA report noted that of the 20.2ha of agricultural land proposed for the tracks, solar stations and substation, less than 3 ha would be BMV land. Paragraph 4.52 of the Secretary of State's decision letter acknowledges that the permanent loss of 2.8ha of BMV is a harm of the proposed development.

Gate Burton- this was a 60 year time limited consent. Paragraphs 12.8.8 of Chapter 12 Socio Economics and Land Use (REP4-010) stated that "the Solar Energy and Solar Park contains 73.6 ha of BMV and 6.8 ha of estimated BMV of which approximately 2 ha will be permanently lost due to the construction of the substation and permanent planting on site…

The remainder and vast majority of BMV land affected (approx 73 ha) will be temporary and reversible following decommissioning". There was a clear distinction made between the temporary loss of agricultural land for the solar arrays during the operational phase of 60 years where the use could revert back to agriculture and the permanent loss of agricultural land for the permanent planting and substation which was not reversible. Paragraph 1.1.2 of the Decommissioning Environmental Management Plan (APP-026) stated that the future of the substation and associated control buildings would be agreed with the LPA prior to commencement of decommissioning. Paragraph 4.174 of the Secretary of State's decision letter states "The Secretary of State agrees with the ExA that 2 ha of BMV would be permanently lost and around 73ha would be out of arable use for 60 years".

Beacon Fen (yet to be decided) -time limited consent 40 years. Paragraph 14.7.3 Chapter 14 Soils and Agricultural Land (APP-065) says that the permanent land take is the footprint of the built development including the BESS, substation, transformer stations, construction compounds and the access tracks and roads, a total of 23.31 ha. A distinction is made between this permanent loss of land and the temporary nature of the loss of agricultural land for the solar arrays where the land can be returned to agriculture after decommissioning (paragraph 14.7.2 refers). Paragraph 1.4.9 of the Outline Decommissioning Plan (APP-078) states that all solar infrastructure will be removed on decommissioning.

The intention in all of the cases referred to above, with the exception of Gate Burton (where the future of the substation was to be decided at the time of decommissioning), was to remove the infrastructure and revert the use of the land to agriculture on decommissioning. In all cases there is an acknowledgement that there would be a permanent loss of agricultural land for the areas of the substations, BESS etc. In Mallard Pass and Heckington Fen, the applicants acknowledged that even though their intention was to remove the infrastructure, there was doubt as to whether the soils under these areas could be returned to their former ALC quality and adopting a cautious approach, they considered that these areas were permanently lost."

LV.2.03 Perception of solar panels in the landscape

<u>4.1 Applicant's response</u>

The appeal decision at Land at Park Farm, Gillingham, Dorset (Appeal ref APP/D1265/W/22/3300299) is authority for the proposition that solar farms are becoming gradually accepted in rural areas.

The authors of the Lancaster University study of 32 sites wrote on their website that "ground-mounted solar have become a familiar sight across the UKs agricultural landscape".

The "washed over" appearance of the proposed development is evident from the Viking Way, over 4.4km away.

The overall scale of the proposed development is not evident from people's views of a relatively small part of the wider site from an individual location.

4.2 Comments in reply

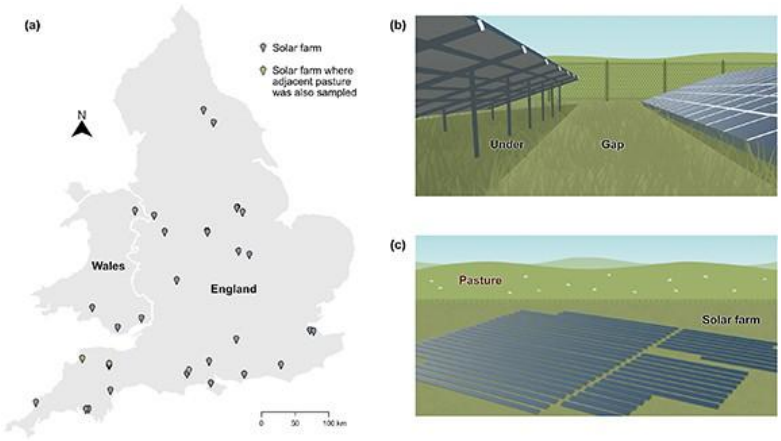
4.2.1 The appeal decision referred to by the Applicant was in relation to a proposal for a solar PV farm battery storage and associated infrastructure, including inverters, batteries, substations, security cameras, fencing, access tracks and landscaping on a 33ha site at Park Farm, Gillingham. At paragraph 33 of appeal decision, the Inspector commented on the contrasting views put forward by the appellant and Dorset Council about the character of the proposed development. The Inspector wrote:-

"There was an argument put forward by the appellant that the proposed solar farm would be inherently rural in nature. But although many solar farms are now located in rural settings, I do not consider that they are so common that the have come to be regarded as a form of development which is inherently rural. But nor do I accept the Council's assertion that they are industrial in visual terms, as they have little in common with industrial development and are becoming gradually accepted in rural areas".

4.2.2 It is not clear on what basis the Inspector was asserting that solar farms were becoming gradually accepted. Certainly the proposed solar farm at Park Farm, Gillingham was not accepted by Dorset Council who refused the application. It was not accepted by Motcombe Parish Council who objected to the planning application. It was not accepted by Gillingham Town Council who objected to the planning application. It was not accepted by 74 members of the public who objected to the planning application.

4.2.3 If the term "acceptance" was being used by the Inspector to suggest that large scale solar farms are becoming seen as a common characteristic of the agricultural landscape, this cannot apply to Lincolnshire as no large scale solar farm has yet been constructed. According to the Renewable Energy Planning Database, there are about 25 small scale operational developments with solar arrays (for which planning permission has been granted) in Lincolnshire, 12 of these under 5MW capacity, 10 of these being between 6 and 25MW, with the largest being 32.5 MW.

4.2.4 The comment on the Lancaster University website that "ground-mounted solar have become a familiar sight across the UKs agricultural landscape" relates to a study of 32 solar farms in England and Wales during 2021 (F Carvalho *et al* "Plant and soil responses to ground-mounted solar panels in temperate agricultural systems" Environmental Research Letters Vol 20, Number 2 10 January 2025). No information is given in the research paper about the size or capacity of the solar farms. Figure 1 of the paper shows the location of the 32 sites, none of which appear to be in Lincolnshire:-



Location of the 32 solar farms sampled in 2021 (Carvalho *et al* 2025)

4.2.5 The Applicant concedes that the "washed over" appearance of the proposed development "beyond a certain distance" relates to views from the Viking Way, over 4.4km away. LCC and NKDC in their responses to the ExQ point out that even at a distance, when viewed side on, the solar panels look like jagged rows of man-made structures in the landscape and that whilst farmed fields will change colours through the seasons, the "faded" colour of the solar panels will remain as a contrast to these natural colours (REP3-050 and REP3-055). The analysis of the appearance of the solar panels by the Applicant fails to consider the visual impact of the infrastructure associated with the solar panels, such as the fencing, lighting columns, 84-100 solar station compounds, the 328 distributed or centralised BESS with control room and compounds or the onsite substation up to 13.5 m high. The scale and size of this associated infrastructure is of course absent from the smaller solar sites in Lincolnshire.

4.2.6 The Applicant's assertion is that the overall scale of the proposed development is not evident from views of a relatively small part of the wider site from an individual location. This ignores any analysis of sequential views of the proposed development along footpaths and roads around the site.

PE.2.02 Mental Health

5.1 Applicant's response

Reference is made to a number of studies which demonstrate that positive environmental conditions deliver mental health benefits. In providing leisure opportunity and new permissive paths, the proposed development will have an inherent mental health benefit.

5.2 Comments in reply

5.2.1 One of the studies referred to by the Applicant is Ahmadi *et al* 2026 "Exploring the relationship between mental health and urban green space soundscapes: A scoping review" PLoS One 21(3) which shows that natural soundscapes such as birdsong and water promote

stress reduction and cognitive restoration, while mechanical noise is associated with adverse mental health problems.

5.2.2 The route of the proposed new permissive paths mainly around Thorpe on the Hill will be around the edges of solar array fields where there will be noise from the BESS battery containers (if decentralised) and from the inverters, along the noisy A46, and along the existing busy Fosse Road running into Thorpe on the Hill. Rather than experiencing natural soundscapes, the predominant noise will be from vehicles and solar infrastructure which will adversely affect mental health rather than having inherent mental health benefits as the Applicant claims.

TT.2.02 Use of PRoWs affected by the proposed development

6.1 Response by the Applicant, NKDC and LCC

The Applicant has not carried out surveys of PRoW users. LCC state that it does not have count data (REP3-050). NKDC say that it holds some data which it has not been able to interrogate and collate (REP3-055).

6.2 Comments in Reply

NKDC produced 2024/25 footfall counter data for the Stepping Out network as part of the Springwell DCO (REP1-103):-

2024-25	April	May	June	July	August	September	October	November	December	January	February	March		Sub Total
Hill Holt Wood Total	**14091**	**22887**	**23593**	**25741**	**24535**	**20725**	**18143**	**19527**	**22393**	**15555**	**19401**	**24991**		**251582**
ountryside NK Events	0	34	6			32	25	20	15	20	20	8		180
Valking Festival	0	0	1167	0	0	0								1167
tepping Out Network	14091	22853	22420	25741	24535	20693	18118	19507	22378	15555	19401	24991		250283
Skellingthorpe Old Wood	843		912	351	361	223	561	882	1111	1737	746	634		8361
Aubourn & Haddington			846	2331	1221	1437	1456	1944	1737	373	758	1007		13110
River Witham				470	716	529	560	610	577	600	580	678		5320
Thopre on the Hill & Tunman		752	441	774	964	598	705	691	814	603	488	764		7594
Haverholm/Eastern Slea	90	454	211	331	201	120	202	148	210	220	268	223		2678
Slea Riverside Walk			171	50	102	262	221	181	230	158	121	262		1758
Rauceby	690	881	721	609	558	894	379	620	980	740	791	1021		8884
Welbourn	315	370	410	441	565	479	328	468	320	364	542	577		5179
Wellingore & Temple Bruer	439	697	467	482	665	442	471	684	476	535	708	551		6617
Bloxholm & Brancewell														0
Car Dyke by Wood & Fen	133	766	958	1012	1040	1241	728	671	713	612	806	772		9452
Martin/Metheringham barff	418	658	613	426	525	413	488	332	408	446	416	428		5571
Nocton & Dunston	301	134	219	120	212	424	144	360	241	334	222	208		2919
Blankney	44	64	927	710	721	969	902	836	592	447	430	563		7205
Scopwick & Kirkby Green	231	517	300	574	633	274	296	328	506	370	440	434		4903
Culverthorpe	998	2769	1330	1558	1363	1091	1041	1555	1459	1154	857	1068		16243
Heckington	1439	4657	1348	1236	1134	1298	1398	902	1218	1104	978	1544		18256
Hill Holt Wood	640	401	825	439	385	681	599	568	301	537	484	585		6445
Big Wood	832	1015	801	263	617	396	345	540	496	754	647	493		7199
Lollycocks	2276	2591	4832	6682	7251	4168	3894	2131	3640	3751	4078	5012		50306
Milennium Green	4402	6127	6088	6882	5301	4754	3400	5056	6349	716	5041	8167		62283

Section C Comments on Technical Note for the proposed National Grid Substation near Navenby REP3-046

Paragraph 2.1.9
"Similar to the DCO Application for the Proposed Development, other solar NSIP schemes are coming forward with connections at new substations where their consent is not included in the DCO"

1.0 These schemes are stated to be :-

> North Humber to High Marnham [EN020034] :- This application is at pre-app stage, it is not a solar NSIP, it is a proposal to reinforce the electricity transmission network by building a new 400kV connection between two proposed substations, the Birkhill Wood Substation which already has planning permission (25/01898/STPLF) and High Marnham Substation in respect of which a planning application has already been submitted to Bassetlaw District Council (25/01302/FUL).
>
> Rosefield Solar Farm [EN010158] :- NGET are proposing to replace their existing East Claydon substation located directly west of the existing substation site into which the proposed solar development will connect. NGET will submit a TCPA planning application for the replacement substation to Buckinghamshire Council. As the principle of development of the substation has already been established in this location, there would presumably be no obvious reason why this element of the project is likely to be refused.

1.1 The Applicant has made reference to Botley West Solar Farm [EN010147]. The DCO application includes the proposed NGET substation within the order limits with the construction of the substation being included as part of the DCO. NGET's preference is for a substation just outside the order limits and intends to pursue the necessary land rights and consents but if unsuccessful the fallback position is that the DCO would authorise the substation within the DCO order limits.

1.2 None of the schemes referred to by the Applicant are analogous to the Fosse Green DCO which does not include the construction of the proposed substation within the DCO, the proposed NGET Navenby substation does not already have planning permission, a planning application for the Navenby substation has not yet been submitted, the proposed Navenby substation does not adjoin an existing substation where the principle of development has already been established.

Paragraph 3.4.20
"Given the above appraisal, it is considered that there is no obvious reasons to conclude that the proposed Navenby substation would conflict with the Development Plan as a whole"

2.0 I have previously set out the potentially significant effects of the proposed Navenby substation development which could not be realistically mitigated in REP1-106 paragraphs 1.5 to 1.7. The Applicant has failed to acknowledge that these environmental impacts may

tip the planning balance against the granting of planning permission for the Navenby substation.

3.8 Precedent Schemes
"For a wider context, a search was conducted for other recent planning application approvals for NGET substations. High level summaries of two cases are set out below."

3.0 Whilst the Applicant has referred to two recent planning approvals for substations sites, there are equally a number of planning applications for substation sites that have been refused as follows:-

Emmock Substation in Angus (24/00699/FUL) refused by Angus Council on 16 December 2025 for the following reasons:-

(1) The Application is contrary to NPF4 Policy 11(c) because it has not been demonstrated that the proposal would maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities for the Angus economy;
(2) The Application is contrary to NPF4 Policy 11(e) ii, 14 and 29(b) because insufficient detail has been submitted to demonstrate that appropriate design mitigation has been applied to the proposal to mitigate significant adverse landscape and visual impacts, and the proposal would be detrimental to the amenity of the area and is not suitably scaled, sited and designed; and
(3) The proposed development combined with other existing, consented and proposed transmission and energy development in the surrounding area would give rise to significant and unacceptable cumulative landscape and visual impacts contrary to NPF4 Policy 11 (e) (xii)

SSEN Stores Fanellen (25/00826/FUL) refused by Highland Council on 5 February 2026 for the following reasons:-

(1) In terms of EIA Regulations, the human health of this proposal should not have been scoped out.
(2) The cumulative landscape and visual impacts have not been adequately addressed.
(3) The environmental impacts of the replacement Black Bridge to access the site have not been assessed, and the Committee is unable to ensure that the likely significant effects of the proposed development have been identified, described and assessed. This information is required to enable a reasoned conclusion to be reached on those effects before planning permission is granted. This is a requirement of the EIA Regulations and a statutory duty placed on the decision maker.
(4) The site is a greenfield site and NPF Policy 9(b) does not support development proposals on greenfield sites unless the site is allocated or supported by policies in the LDP which it is not.

Loch Buidhe Substation (24/05062/FUL) refused by the Highland Council on 9 January 2026 for the following reasons:-

- The proposed development does not comply with NPF4 Policies 1,2, 5(c)(ii), 11(e)(xiii) and 13 and Policy 56 and 67 of the Highland-wide Local Development Plan
- The proposed development forms a functionally interdependent component of the wider Spittal-Loch Buidhe -Beauty 400kV electricity transmission project. The assessment identifies moderate adverse and significant cumulative landscape and visual effects, which are assessed on the assumption that construction of the substation and the associated overhead line would not overlap; however that assumption is not secured by way of planning condition. In the event of overlapping construction, cumulative landscape and visual effects would be of greater magnitude and longer duration than those assessed resulting in significantly detrimental effects on the upland and upland fringe landscape character around Carnaig and Loch Buidhe, and the visual amenity of residents of Bonar Bridge, residents of scattered rural properties along Migdale Road and the U3521 (Loch Buidhe Road), and road users and recreational users of the surrounding area. In these circumstances, the proposal does not demonstrate how cumulative landscape and visual impacts would be appropriately mitigated and therefore the proposal fails to comply with Policy 11(e) (xiii) of NPF4 and Policy 67 of the HwLDP.
- The assessment acknowledges the potential for cumulative construction traffic arising from the combined construction of the substation and the overhead line. These impacts are considered to be substantial given the nature and scale of the development. However, while cumulative traffic effects are identified, the assessment does not provide a sufficiently robust assessment of the combined effects of HGV and abnormal load traffic on constrained local routes, including Bonar Bridge, Migdale Road and the U3521 (Loch Buidhe Road). In particular, the assessment does not identify, define or assess the specific transport mitigation measures required to accommodate this level of cumulative traffic, including the extent of road widening, strengthening and reconstruction works identified by the Council's Transport Planning advice as likely to be necessary along Migdale Road and associated sections of the local road network. The proposal therefore fails to demonstrate how the cumulative impacts on road safety, residential amenity and network capacity for residents in Bonar Bridge and for those living in scattered rural properties along Migdale Road and the U3521 and on Bonar Bridge itself would be adequately addressed. As such, the proposal fails to comply with Policies 11(e)(xiii) and 13 of NPF4 and Policy 56 of the HwLDP.
- The proposed development would involve the disturbance and removal of a substantial quantity of peat, resulting in a carbon loss of approximately 110,590 tonnes of CO^2e. While the proposal relates to renewable energy infrastructure, it has not been demonstrated that peat disturbance has been avoided or minimised through appropriate siting, layout or design, nor that the resulting carbon loss would be fully mitigated so as to optimise greenhouse gas emissions reductions.

As such, the proposed development does not comply with NPF4 Policies 1,2 and 5(c) (ii).

Fetterso Substation (APP/2024/1951) refused by Aberdeenshire Council on 30 January 2026 for the following reasons:-

The application is considered by the Planning Authority not to comply with the Aberdeenshire Local Development Plan 2023 and NPF4. The proposal does not comply with the following planning policies:-

- NPF4 Policy 11e ii as the proposal will have significant landscape and visual impacts that are unacceptable and cannot be mitigated
- NPF4 Policy 11xiii as regards to the cumulative significant landscape and visual impact of consented applications
- NPF4 Policy 3 d as regards to potential adverse impacts including adverse impacts of development proposals on biodiversity, nature networks, and the natural environment
- NPF4 Policy 22 c i as the proposal has not demonstrated that there will be an increase to the risk of surface water flooding to others or itself

Matford Home Farm Substation Exeter (23/00936/MAJ) refused by Teignbridge District Council on 3 May 2024 for the following reason:-

The application site currently consists of a mix of uses and buildings and has an industrial/agricultural appearance within a rural location currently undergoing significant planned change as part of the South West of Exeter Urban Extension. The application site is identified within the South West Exeter Development Framework (2014) as Development Plan Area E1 for Mixed Use development and Community Facilities and has outline planning permission granted for such a development. Whilst the need for electricity infrastructure to serve the new dwellings at South West Exeter is acknowledged it is considered that the proposed development on the application site would result in a large, overbearing and alien structure, which by its nature is uninviting and hostile, within the landscape immediately adjacent to both existing and proposed residential properties. Whilst some attempt has been made to mitigate the impact, the depth of landscape buffer proposed is not considered sufficient to screen a development of the size and nature proposed in such close proximity to the existing dwellings. The proposed development would not be consistent with the comprehensive approach to development as set out in policy SWE1 and the South West Exeter Development Framework and would result in significant harm to the character and appearance of the area and the amenity of both existing and future residents. The proposed development is therefore contrary to policies S1, S2 and SW1 of the Teignbridge Local Plan 2013-2033 an the NPPF.