

From [REDACTED] Chair of the Cliff Villages Solar  
Action Group: Final submission



## **Response to**

### **7.3 Design Approach Document now to include the Design Commitments**

The new document will need its Executive Summary updating as well as including the new design commitments

### **Fosse Green Energy EN10154 Volume 7**

#### **False characterisation and inconsistency**

3.6.10 Appendix 10-**C Landscape Character Baseline** of the ES [EN010154/APP/6.3] sets out the key characteristics of the national, regional and local landscape character areas. Land Use 3.6.11

“The Site consists primarily of non BMV agricultural fields of poorer quality.” This is a false characterisation. Referring to grade 3b as “poorer” belies the fact these fields grow excellent grain. 3.6.16 describes the land as 27.8% BMV, with an additional 1.8% not counted and a further 1.8% not accounted for. Including all the land could realistically take the BMV land over 30%, an unacceptable level, even allowing for mitigations.

In addition, the cable corridor does seriously damage a wide section of topsoil, much of which is BMV, but details have been omitted here.

#### **Misleading in Land Use**

3.6.17 “50% of the land within the Principal site is currently used for non-food crop, (eg Biofuel, Biomass fuel, pet foods).” This is misleading. Taking this land out of energy production will wholly displace grain crops travelling further from the biodigesters, increasing their carbon footprint and reducing food crops. Grain is grown to feed beef and dairy cattle, and other livestock which provide food for people. It is seriously misleading to call this “pet foods”.

#### **Misleading in Flood Risk**

3.6.29 describes the location of the flood areas, but does not give any indication of their quantity, percentage nor significance. Even the detailed appendix is careful to exclude any indication of the scale of the problem. What percentage or area is affected by each flood zone?

How much of the area is likely to be flooded up to 2m and what impact does that have on their safety, operational capacity and is this included in the calculations for traffic

and disturbance during their reconstruction and repair? The map in the appendix shows extensive flood risk.

The appendix even in sanitised language reads; “Flood depths within the proposed solar farm site boundary were up to **2.0 m** in areas”, with more **widespread flooding** occurring in the western floodplain of the River Brant. • “solar panels on the River Brant floodplain which do flood to a depth of at most **0.5 m** above existing ground elevation.”

**Wrong location: Poor site choice based on a landowner and there is no grid connection here. Benefits are diminished as NESO have published that their target 2035 is already met. It does not include Fosse Green or they would have a gate 2 permission.**

Paragraph 2.10.25 of NPS EN-3 states “To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs, applicants may choose a site based on nearby available grid export capacity”.

2.10.29 of NPS EN-3 states that “Where possible, previously developed land should be favoured and where agricultural land is necessary, preference should be given to poorer quality land rather than high quality (Best and Most Versatile) land.”

If the substation was proposed in a disused quarry, would it make this application invalid?

#### **Fosse Green EN10154 9.35 Design Commitments (Clean)**

AM1 “A minimum offset of 50m from solar infrastructure will be included around all residential properties to minimise impacts to their visual amenity.”

“Solar infrastructure” **needs to be more specific to solar panels**. Otherwise it could suggest a very close proximity to 1,300 shipping containers of Lithium battery, or to a 30 acre field of substation. That would be entirely unreasonable. It should be 100m as around Witham St Hughs, more than 50m.

EC14 “Arable fields will continue as currently used for Maize, Barley or Wheat and, within these fields, Skylark plots will be provided a minimum of 25m between the plots and at least 50m from the field boundary.”

Maize is no good for skylarks, nor any other wildlife. What about beans/peas for crop rotation? Suggest replacing “maize” for a “legume crop, such as peas or beans”.

#### **New Information: MOD Objection**

The MOD have objected to the 2,075 acre Solar Industry on fields at the Drovers in Norfolk near RAF Marnham. They say solar panels could interfere with radar at RAF Marham, home of the UK's F-35 Lightning jets. The issue for Fosse Green is much worse.

Waddington Airbase has many foreign jets annually, exercising in new airspace. The Red Arrow and Typhoons travel at significant speeds in close proximity to each other and frequently upside down. How much more dangerous that is. In addition, any aircraft in distress must drop its fuel tanks before landing in an emergency. As Fosse Green is straight out from under the runway, it is in prime position, and especially worrying for the Batteries and substation. The MOD warned metal solar arrays would interfere with its radar system at RAF Marnham, as it would here with Waddington, Cranwell and Digby all in close proximity. The application should be treated by the Inspectorate appropriately, recognising this objection could apply to Fosse Green.

**Clearly, we believe this is the wrong location for a development of this scale and that the adverse impacts outweigh any possible advantages, especially without an extant grid connection.**

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