

RESPONSE FROM THORPE ON THE HILL PARISH COUNCIL ON THE FOSSE GREEN SCOPING CONSULTATION

July 17th, 2023

Firstly, while not directly germane to the Environmental Statement for Fosse Green, the Parish Council would like to endorse the following statement from Lincolnshire County Council, in relation to the cumulative effects of solar developments on our county.

The County Council informs the Examining Authority in its written response that whilst the project would produce clean renewable energy that would support the nations transition to a low carbon future and deliver significant biodiversity net gain benefits through the creation of mitigation and enhancements as well as other more limited positive impacts (as identified within our Local Impact Report), these positive impacts are not outweighed by the negative, some significant, impacts that arise given the overall size and scale of the development both on its own and in combination with the three other solar projects proposed in this geographical area.

This is due to the long term and negative impacts that this proposal would have on the landscape character and appearance of the area through the replacement of large areas of agricultural with Solar development together with the cumulative impact from the other three solar projects in this area.

The cumulative change to the landscape will be considerable, and the combination of two or more solar projects has the potential to change the local landscape character at a scale that would be “of more than local significance” or would be “in breach of recognised acceptability, legislation, policy or standards”.

The cumulative impact of the four adjacent NSIP solar sites has the potential to affect the landscape at a regional scale through predominantly a change in land use: from arable to solar, creating an “energy landscape” as opposed to rural/agricultural one at present.

This also has the potential to change the character from an agricultural landscape to that of an “energy” landscape when traveling through the area, and the sequential effects of multiple large scale solar sites, of which some are spread over extensive, fragmented redline boundaries, exacerbating the perception of being surrounded by solar development.

In addition, the loss of arable agricultural land classed as Best and Most Versatile would have a cumulative or defined negative impact that will result in the loss of agricultural production in the development area generally and/or the permanent loss of production from mostly medium quality agricultural Page 13 land.

A county-level alternative assessment area should be applied which as a minimum should consider scope for connection into the National Grid at the locations proposed by the registered NSIP solar projects locally, and with specific consideration of agricultural land impacts. That if the Secretary of State grants the Development Consent Order a comprehensive and appropriate package of Community Benefits is secured and delivered to compensate for the identified negative impacts that the proposed development would cause to the communities affected by this project.

SPECIFIC REQUESTS FOR ADDITIONAL CONTENT TO BE INCLUDED IN THE ES

SUMMARY OF REQUESTS

Thorpe on the Hill Parish Council request that an Agricultural Land Classification Report should be submitted as part of the ES, setting out the justification for the loss of BMV land and how criterion b of Policy 67 has been met. As required under Central Lincolnshire Local Plan 2023, Policy 67.

Thorpe on the Hill Parish Council request that the ES contains a full comparative analysis of all alternative technologies that could be employed, including wind turbines.

Thorpe on the Hill Parish Council request the ES contains full details of other sites considered, particularly brown field sites and those not including a high proportion of BMV land, and full details of why those sites were considered less suitable.

Thorpe on the Hill Parish Council request that the A46 woodland belt and other woodland as listed should be identified and included in the ES. It is further requested that trees and hedges along highway verges and field hedgerows should also be identified and included in the ES.

Thorpe on the Hill Parish Council request that the impact on birds, particularly water birds, is not scoped out of the ES.

Thorpe on the Hill Parish Council request that Stocking Wood be listed as a non-statutory site and, as such, the site boundary be redrawn to exclude Stocking Wood.

Thorpe on the Hill Parish Council request that a full assessment of the potential hazards and risk to life of placing an estimated 192 batteries, each 6.5m by 2.5m by 3m in proximity to residential housing be included in the ES. This should include a full impact assessment of a fire and explosion, not just a dismissal of these events as unlikely to happen. This assessment should take note that the UK's record temperature, 40.3 degrees centigrade, was recorded within 35 km of the proposed site.

Thorpe on the Hill Parish Council notes that no reference to Witham Valley Country Park is made in the scoping document. We request that the importance of the park is acknowledged in the ES. We further request that a full assessment of the environmental and socio-economic impact of placing a large solar farm in the centre of the park is included in the ES.

Thorpe on the Hill Parish Council requests that the scope of the LVIA be extended to cover views from the limestone ridge and the cliff villages, with full consideration of both normal visual impact and the enhanced impact created by glint and glare from the panels.

Thorpe on the Hill Parish Council request that, to allow consultees to fully appreciate the visual impact the solar farm will have on local walking routes, the Thorpe on the Hill Stepping out Leaflet is reproduced, replacing the current images with artist impressions of the views available should the development be completed.

Thorpe on the Hill Parish Council request that the ES contains an assessment of the aesthetic impact on public footpaths and bridleways within the boundaries, should the development be completed, and recognises the need to protect these vital public amenities.

Thorpe on the Hill Parish Council requests that the ES clarifies what the phrase 'have regard to' (11.3.11 of the scoping document) means in practice in relation to the ten protected views recorded in the Neighbourhood Plan. The Council further requests that artists impressions are

included in the ES showing the likely impact on these views should the development be completed.

Thorpe on the Hill Parish Council requests that the ES contains a full consideration of the impact the loss of 2,500 acres of BMV land will have on the GLLEP agri-food priority and further, that this impact assessment be set in the context of the cumulative land loss effect of other solar farms proposed in the area.

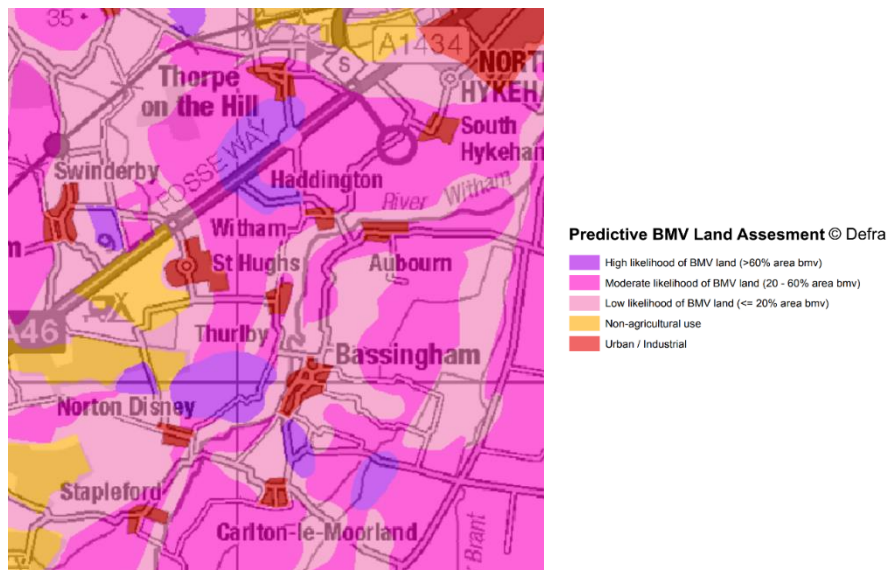
Thorpe on the Hill Parish Council request that a summary of a full consultation with the Ministry of Defence be included in the ES.

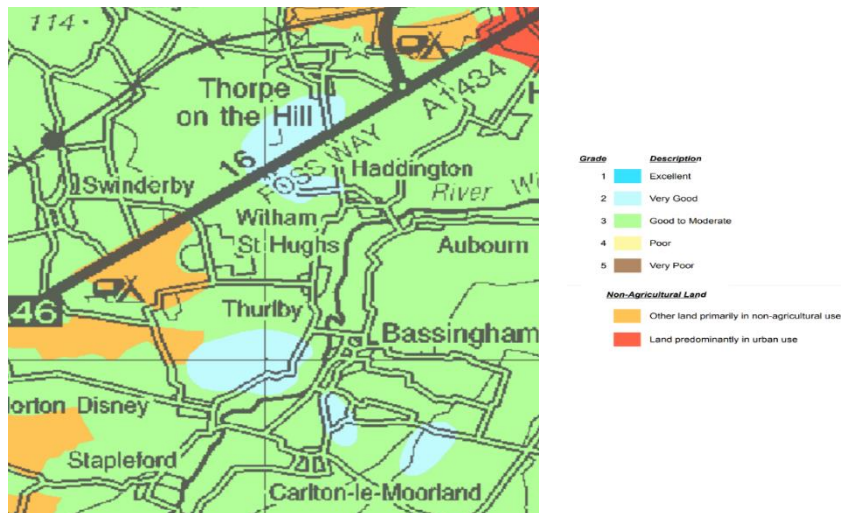
JUSTIFICATION FOR THE PARISH COUNCIL'S REQUESTS

USE OF BMV LAND

Thorpe on the Hill Parish Council consider the scoping report pays insufficient attention to BMV land.

The maps below show the probabilities that land is designated BMV (Best and most Versatile) within the proposed boundaries of Fosse Green. Most of the land earmarked for the solar farm falls into that category.





Thorpe on the Hill Parish Council believe the relevant policies include:

Overarching National Policy Statement for Energy (EN-1) 2023

5.11.12 Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).

5.11.34 The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

Central Lincolnshire Local Plan (2023), Policy 67 **(not mentioned in the scoping document)**

Policy S67: Best and Most Versatile Agricultural Land Proposals should protect the best and most versatile agricultural land so as to protect opportunities for food production and the continuance of the agricultural economy. With the exception of allocated sites, significant development resulting in the loss of the best and most versatile agricultural land will only be supported if:

- a) The need for the proposed development has been clearly established and there is insufficient low grade land available at that settlement (unless development of such low grade land would be inconsistent with other sustainability considerations); and
- b) The benefits and/or sustainability considerations outweigh the need to protect such land, when taking into account the economic and other benefits of the best and most versatile agricultural land; and
- c) The impacts of the proposal upon ongoing agricultural operations have been minimised through the use of appropriate design solutions; and
- d) Where feasible, once any development which is supported has ceased its useful life the land will be restored to its former use (this condition will be secured by planning condition where appropriate). Where proposals are for sites of 1 hectare or larger, which would result in the loss of best and most versatile agricultural land, an agricultural land classification report should be submitted, setting out the justification for such a loss and how criterion b has been met.

Thorpe on the Hill Parish Council request that an Agricultural Land Classification Report should be submitted as part of the ES, setting out the justification for the loss of BMV land and how criterion b of Policy 67 has been met. As required under Central Lincolnshire Local Plan 2023, Policy 67.

ALTERNATIVES CONSIDERED

Thorpe on the Hill Parish Council consider Section 4 of the scoping report to be very limited in ambition. This is the relevant section.

4.1.5 The ES will include a description of the alternatives relevant to the Proposed Development that have been considered, including their specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. This will include alternative site layouts, which will be considered during the design process. A full detailed appraisal of the options considered will be presented as part of the ES, discussing the rationale for the final site layout and design selection, as well as explaining the flexibility sought within the consent in this regard.

Thorpe on the Hill Parish Council request that the ES contains a full comparative analysis of all alternative technologies that could be employed, including wind turbines.

SITE SELECTION

The very brief reference in the Environmental Impact Assessment Scoping Report to site selection is shown below. This, particularly 4.2.2, which indicated the application boundaries may change, severely limits the opportunity to respond at this stage.

4.2.1 The evaluation process for site selection explored a range of possible alternatives, considering key environmental, planning and access constraints, and including liaison with landowners. The reasons for selecting the site will be presented in the ES.

4.2.2 Further refinement will be undertaken as the Proposed Development design progresses to determine the DCO application boundaries and layout for the Site submitted with the DCO application.

Thorpe on the Hill Parish Council request the ES contains full details of other sites considered, particularly brown field sites and those not including a high proportion of BMV land, and full details of why those sites were considered less suitable.

ECOLOGY AND BIODIVERSITY

The extract below is from Section 9.7 of the Environmental Impact Assessment Scoping Report, listing items scoped out;

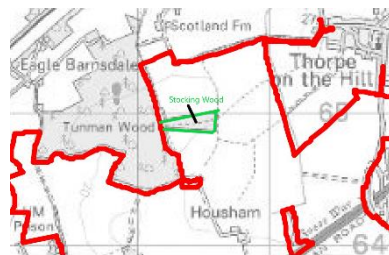
9.7.2 The following potential operational effects are scoped out of further assessment.

Attraction of birds to solar panels – there is no evidence from operational solar Proposed Developments in the UK that the solar panels attract congregations of birds, which may lead to displacement of populations and increase the risk of mortality (through collision with solar panels and infrastructure). In addition, the Proposed Development is not located near areas, such as wetlands, which support large congregations of birds, nor is the Proposed Development located on a migratory flyway or on a flightpath between areas supporting congregations of birds. As such this potential impact pathway is scoped out of further assessment.

The proposed development is not near wetlands, but it is very close to many lakes (former gravel workings), the Whisby Nature reserve, and the Eric East Memorial Lake, an environmental 'lung' for residents, all well populated with water birds. While recognising that the evidence that large numbers of bird deaths are caused by mistaking solar panels for water is not well established, the council still feel this issue should not be simply be scoped out.

Thorpe on the Hill Parish Council request that the impact on birds, particularly water birds, is not scoped out of the ES.

Stocking Wood has not been listed in the Environmental Impact Assessment Scoping Report as a non-statutory site and has been included within the site boundary. Stocking Wood is a small wood, extending out to the East from Tunman Wood. It appears to have been overlooked by the developers and included within the development boundary.



Thorpe on the Hill Parish Council request that Stocking Wood be listed as a non-statutory site and, as such, the site boundary be redrawn to exclude Stocking Wood.

There is also a significant small belt of woodland located alongside to the north of the A46 in the vicinity of the radio/telephone mast included within the site boundary. There are further small, but significant patches of woodland (e.g. to the east of Morton Grange and Ash Holt (North-east of Halfway Houses) within Thorpe on the Hill Parish. Moreover, some verges of public highways and hedgerows within the area have trees and these should be protected against removal.

Thorpe on the Hill Parish Council request that the A46 woodland belt and other woodland as listed above should be identified and included in the ES. It is further requested that trees and hedges along highway verges and field hedgerows should also be identified and included in the ES.

BATTERY SAFETY

The Environmental Impact Assessment Scoping Report is almost dismissive of any potential hazards associated with placing an estimated 192 batteries, each 6.5m by 2.5m by 3m in proximity to residential housing. It reads as if the technology to control any risk is proven and well established. This view is contradicted by reports such as Safety of Grid Scale Lithium-Ion Battery Energy Storage Systems by Professors Edmund John Fordham, Energetics Research and Consulting Limited, and Wade William Magill Allison, University of Oxford. Consequently, there is no indication that the risk to life, if a fire or explosion were to occur, will be assessed.

These are relevant extracts from the scoping report.

Fire Local residents, habitats and species. There may be some potential for fire as a result of the battery storage element. However, the battery energy storage system will include cooling systems, which are designed to regulate temperatures to within safe conditions to minimise the risk of fire

While impacts are expected as a result of projected temperature increases (due to climate change), these temperature increases are not expected to have a significant impact on the Proposed Development. It is anticipated that the cooling systems for the battery energy storage systems, will regulate temperatures to within safe conditions.

There may be some potential for fire because of the battery storage element of the Proposed Development. However, the battery energy storage system will include cooling systems, which are designed to regulate temperatures to within safe conditions to minimise the risk of fire. In addition, the Proposed Development design will include adequate separation between battery banks to ensure that an isolated fire would not become widespread and lead to a major incident. Fire detection and suppression features would be installed to detect (e.g. multi-spectrum infrared flame detectors) and suppress fire (e.g. water base suppression systems) to minimise the effect of any fire.

Thorpe on the Hill Parish Council request that a full assessment of the potential hazards and risk to life of placing an estimated 192 batteries, each 6.5m by 2.5m by 3m in proximity to residential housing be included in the ES. This should include a full impact assessment of a fire and explosion, not just a dismissal of these events as unlikely to happen. This assessment should take note that the UK's record temperature, 40.3 degrees centigrade, was recorded within 35 km of the proposed site, and predictions that Europe's climate is highly likely to face further increases in record temperatures.

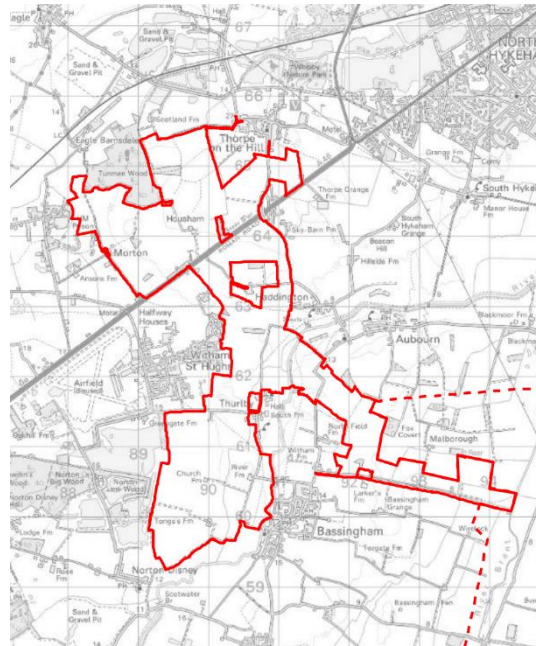
WITHAM VALLEY COUNTRY PARK

There is no mention in the scoping document of Witham Valley Country Park

Connecting a variety of public green spaces in the heart of Lincolnshire, Witham Valley Country Park covers around 40 square miles of high quality, unspoilt countryside, rich in wildlife and history.

The concept of WVCP came out of a partnership between City of Lincoln Council, Lincolnshire County Council, North Kesteven District Council, West Lindsey District Council, Natural England, the Environment Agency and the Lincolnshire Wildlife Trust. In creating a single, marketable identity the idea is to encourage more people to explore the green spaces in that part of Lincolnshire, especially the less well-known ones.

Witham Valley Country Park is promoted by the City of Lincoln Council, Visit Lincoln, North Kesteven District Council, and the Greater Lincolnshire Nature Partnership as a significant tourist attraction, an amenity for residents, and a sanctuary for wildlife.



Thorse on the Hill Parish Council notes that no reference to Witham Valley Country Park is made in the scoping document. We request that the importance of the park is acknowledged in the ES. We further request that a full assessment of the environmental and socio-economic impact of placing a large solar farm in the centre of the park is included in the ES.

VISUAL IMPACT

We consider that Section 11.2 of the scoping report is complete inadequate in the limits it places on the LVIA.

1.2.3 Based on the desk based review undertaken to date, and the fieldwork undertaken in April 2023, the extent of visibility of the Proposed Development will vary in different directions, dependent on surrounding landform, woodland, field boundaries, roadside vegetation and built features. The preliminary study area relating to the Solar and Energy Storage Park therefore extends up to 2km from its boundary to cover:

- *Land between Swinderby, Eagle and North Hykeham in the north; and Fosse Green Energy EIA Scoping Report June 2023 Prepared for: Fosse Green Energy Ltd AECOM 138*
- *Land between Stapleford, Carlton le Moorland and South Hykeham in the south.*

11.2.4 Although the Proposed Development may be visible beyond 2km, it is unlikely to result in any notable change to people’s views given the intervening distance, vegetation, built form and overall visibility.

11.2.5 The study area will also cover land up to 500m from the potential connection corridors. In the event that the option of an overhead line, as set out in Section 3, forms part of the Proposed Development, the study area will be increased through consultation with LPAs to an extent defined by the potential for the overhead lines and associated infrastructure to have significant effects on landscape character and visual amenity.

11.2.6 The extent of the LVIA study area will be reviewed throughout the iterative design process, informed by ongoing desk based research and field based analysis during winter and summer

conditions, to account for when deciduous vegetation is not in leaf. The extent of the LVIA study area will be consulted upon with the LPAs and the justification for its final extent provided in the ES.

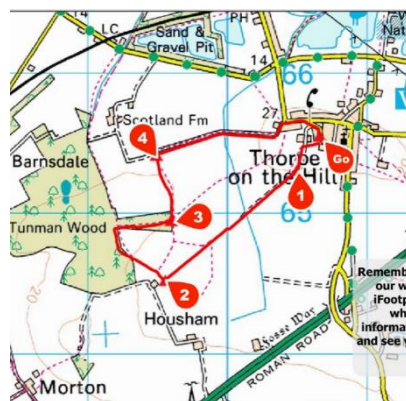
The Cliff Villages are in a locally designated Area of Great Landscape Value. Regarding the local landscape character, consideration should be given to the Natural England publication 'National Character Area Profile: 47 Southern Lincolnshire Edge.' The local landscape is characteristically open with gently undulating topography. Longer distance vistas across arable field systems sporadically delineated with low hedgerows and drystone walls are typical.

The proposed Fosse Green site can be clearly viewed from the limestone ridge and cliff villages. This escarpment encompasses the designated Lincoln Cliff Landscape Character Area. On sunny days, the visual impact may well be greatly magnified by glint and glare from the panels.

Thorpe on the Hill Parish Council requests that the scope of the LVIA be extended to cover views from the limestone ridge and the cliff villages, with full consideration of both normal visual impact and the enhanced impact created by glint and glare from the panels.

STEPPING OUT ROUTE

Thorpe on the Hill is the start and finish of a North Kesteven District Council Stepping Out Route, described as a 3 mile (4.5km) circular walk from the village of Thorpe on the Hill near Lincoln in Lincolnshire, shown below. This route, very well used by residents and visitors, is almost entirely within the proposed solar farm.



This statement is from the NKDC website.

Open spaces are hugely important and valuable assets, and are proven to improve public health, wellbeing and quality of life. They make our communities enjoyable places to live, work and visit, and provide opportunities for all people to engage in healthy and active lifestyles.

High quality and accessible open spaces are essential to the success of our existing Sport and Physical Activity Strategy and Cycling Strategy, and we aim to use these strategies to deliver our ambition of a healthy, fit and vibrant district.

The leaflet for the walk is available from NKDC ([Stepping Out Thorpe on the Hill \(hillholtwood.co.uk\)](http://hillholtwood.co.uk)) and contains a series of images of the views that walkers will experience. Part of the purpose of the ES is surely to give planners, residents, and ramblers' groups clear information about the visual impact the solar farm will have on vital recreational walks.

Thorpe on the Hill Parish Council request that, to allow consultees to fully appreciate the visual impact the solar farm will have on local walking routes, the Thorpe on the Hill Steeping out Leaflet is reproduced, replacing the current images with artist impressions of the views available once the farm is constructed.

There are a significant number of other public right of way, footpaths and bridleways, within the proposed solar farm boundaries. These are shown on a map in the scoping report, but the only written reference to these rights of way is as follows.

Traffic and Transport

2.2.10 The northern part of the Solar and Energy Storage Park intersects the A46. The Solar and Energy Storage Park crosses several Public Right of Ways (PRoW), comprising bridleways, footpaths and a byway. The PRoWs are located primarily in proximity to Thorpe on the Hill and along the River Witham

Currently, these are largely pleasant country walks or rides. They are essential to public wellbeing and were a major benefit to the area during the pandemic. The parish council can find no reference in the scoping document as to how these essential recreational amenities will be protected should the development go ahead.

Thorpe on the Hill Parish Council request that the ES contains an assessment of the aesthetic impact on public footpaths and bridleways within the boundaries, should the development be completed, and recognises the need to protect these vital public amenities.

NEIGHBOURHOOD PLAN

The scoping document makes a very brief reference to Thorpe on the Hill Neighbourhood Plan

11.3.11 The LVIA will also have regard to the following neighbourhood plans:

•*Thorpe on the Hill (Made Plan), noting Policy 5: Landscape and Views (Ref. 84);*

The Neighbourhood Plan contains an appendix of ten images, describes as:

The Parish Council considers the views identified in the publication Views from the Hill (100th Edition) to be the most distinctive within the Parish and worthy of protection from inappropriate development that would significantly alter these. A description of the views is provided below and is supported with photographs. The location and direction of the views are shown on Map 5 of this Neighbourhood Plan.

Thorpe on the Hill Parish Council requests that the ES clarifies what the phrase ‘have regard to’ (11.3.11 of the scoping document) means in practice in relation to the ten protected views recorded in the Neighbourhood Plan. The Council further requests that artists impressions are included in the ES showing the likely impact on these views should the development be completed.

GREATER LINCOLNSHIRE LOCAL ENTERPRISE PARTNERSHIP

The scoping report is very selective in its references to the Greater Lincolnshire Enterprise Partnership, referring only to Industrial strategy and not agricultural strategy, reflected in the fact that the agri-food sector is a top priority for the GLLEP.

Regional Planning Policy • Greater Lincolnshire Local Enterprise Partnership Local Industrial Strategy (Ref. 208) with reference to aspirations to pioneer the industrial decarbonisation sector, building upon local industrial specialisms. Reference is also made to employment and skills ambitions.

This statement is from the enterprise partnership website.

The agri-food sector combines agriculture and food manufacturing with a strong focus on agri-tech (robotics) and the supply chain. Greater Lincolnshire has an international reputation for food, fish, and farming and has one of the largest concentrations of food manufacturing, research, storage and distribution areas in Europe.

Our region is responsible for growing 30% of the nation's vegetables and producing 18% of the poultry, with a total agricultural output of over £2bn in 2019, representing 12% of England's total production. This strength in agriculture is replicated in food processing, with the UK's largest fish processing cluster located on the Humber, the centre of the UK's fresh produce industry in South Lincolnshire and major arable, poultry and meat processors spread right across the area.

In total the food chain provides 24% of jobs throughout Greater Lincolnshire (as compared with just 13% nationally) and 21% of its economic output (7% nationally).

The future of the food chain is therefore absolutely vital to Lincolnshire and its population, and we are strategically important to national [food security](#).

Boasting more Grade 1 agricultural land than any other LEP in England, the Greater Lincolnshire agri-food sector will double its contribution to the economy by 2030 through an ambitious programme of investment in productive capacity, skills and knowledge to drive an increase in high- value- added sales to UK and export markets.

Thorpe on the Hill Parish Council requests that the ES contains a full consideration of the impact the loss of 2,500 acres of BMV land will have on the GLLEP agri-food priority and further, that this impact assessment be set in the context of the cumulative land loss effect of other solar farms proposed in the area.

MINISTRY OF DEFENCE FACILITIES

There are several MOD facilities within 10 miles of the development, some of a highly sensitive nature. There is clearly a potential for the development to impact upon the operation of these facilities.

Thorpe on the Hill Parish Council request that a summary of a full consultation with the Ministry of Defence be included in the ES.