

7000Acres

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Written Representation - Landscape

August 2023

Executive Summary

The Gate Burton Energy Park Ltd has impacts on the landscape character and visual amenity of the proposed site and surrounding landscape.

The 7000 Acres Group is concerned that the Applicant has not fully assessed the harms associated with the proposed development.

The following areas for discussion cover certain issues where questions are left unanswered and evidence is questioned.

Planning Issues. The importance and precedence of Local Impact Reports is raised in relation to section 105 of the Planning Act 2008.

Landscape and Visual Impact Methodology. Inaccuracies and anomalies in the Zone of Theoretical Visibility are considered.

Landscape and Visual Effects. Impacts of the Gate Burton Energy Park Ltd on Landscape Character and Visual Amenity are highlighted. Negative impacts are caused due to failings in the Applicants Landscape Character Baseline. The submitted Landscape and Visual Impact Assessment shows significant harm for both Landscape and Visual Effects.

Mitigation. This is based on the successful implementation of vegetation. The flaws in this approach are discussed and negative impacts on landscape character highlighted. Extensive removal of existing vegetation and the impact of localised browsing compound the negative effects.

Biodiversity and Biodiversity Net Gain. The Applicant does not explain how they will achieve improvements in biodiversity and meet targets of biodiversity net gain. The impact of landscape change is discussed in relation to biodiversity and the feasibility of the Applicants claims assessed.

Soils. The ALC findings supplied by the Applicant are not complete or robust. Damage to soils during construction is highlighted. Long term soil quality cannot be fully assessed as the Applicant has not provided a soil management plan.

Mental health and wellbeing. The positive impact of landscape and green space on mental health and wellbeing is explored. Loss of these benefits has a harmful effect. The Gate Burton Scheme (GBS) proposes to infringe the use of Public Rights of Ways (PRoW's).

Tranquility. Peace and quiet is experienced by residents at the site. The GBS will disturb this peace.

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1. Introduction

- 1.1 The 7000 Acres Group is a collection of local residents and community groups against the vast solar industrialisation of the countryside in the District of West Lindsey, Lincolnshire. Many of our members will be directly and adversely affected by the solar proposals.
- 1.2 The collective opposition to the proposal from members has provided the 7000 Acres Group with a mandate to represent their views.

2. Scope

- 2.1 The purpose of this written representation is to provide the Examining Authority with the perspective of residents and users of the countryside in and around the proposed development of the Gate Burton Energy Park, to express the concerns our members have in relation to the significant loss of landscape character, visual amenity and beauty of the landscape in the area they live.

No arbitrary line has been drawn here to determine any field of influence as residents and users perceive the landscape beyond these lines and in an experiential manner. Therefore, any negative impact is also perceived in this way.

The approach of this written representation is to provide the viewpoint of the people effected by the Gate Burton Scheme (GBS) for the Examining Authority. The contents of this document highlight certain issues, further elements may be added in subsequent written representations as more information comes to light through Examination process.

- 2.2 The issues raised in this written representation will cover aspects regarding:

Landscape and Visual Effects

Mitigation

Biodiversity and Biodiversity Net Gain

Soils

Health & Wellbeing

Tranquility

3. Size and Location of the Gate Burton Energy Park

- 3.1 The Site is 824 hectares (Ha) (2036 acres) of land for solar PV, battery storage, a grid connection and associated infrastructure with landscaping and biodiversity measures. The Order Limits include the 500MW Solar and Energy Park itself which has a 652Ha area, which is proposed for solar photovoltaics and a battery storage energy plant with associated infrastructure. The Grid connection corridor covers 172Ha and connects the proposed solar and energy park to the existing substation at Cottam Power Station in Bassetlaw District.
- 3.2 The location of the solar energy plant is approx. 4km south of Gainsborough, situated on land south of Knaith Park, west of Willingham by Stow, and north of Marton. It is situated closest to the village of Gate Burton with Kexby village at a distance of 1.8km.
- 3.3 The grid connection corridor route would run south, crossing the A1500 (Tillbridge Lane) and running to the east and south of Marton, crossing the A156 (Gainsborough Road). It would then cross the River Trent into Bassetlaw District and would connect to the substation at Cottam Power Station.
- 3.4 The Lincoln to Doncaster railway line is straddled by the proposed development. The B1241 and Willingham Road at Willingham by Stow runs from the north-south to the east of the order limits, while Marton Road and Willingham Road border it to the south.
- 3.5 There is one Public Right of Way (PRoW) crossing the development, and three further PRoW's which run near its boundary. Around the grid connection corridor, footways are limited to the northern side of Cottam Road and the western side of Town Street both near and through the village of Cottam, as well as both sides of Torksey Ferry Road.

- 3.6 The assessment of site alternatives has been carried out on a national scale and not a local scale. This suggests that the location, design and layout of the proposed scheme may be different if addressed locally. There is a requirement in the Environmental Impact Assessment (EIA) Regulations 2017, that information for reasonable alternative sites are provided. The applicant has failed to do this.

4. Planning Issues

- 4.1 It is clear that no National Policy Statement (NPS) has effect in relation to section 104 of the Planning Act 2008 (as recognised by the Applicant) and that section 105 is paramount.

The Local Impact Reports submitted by Lincolnshire County Council (LCC) and West Lindsey District Council (WLDC) take precedence within section 105 above “(b) any matters prescribed in relation to development of the description to which the application relates, and (c) any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State’s decision.”

The above statements set out the hierarchy for assessment and judgement and as such show that Local Impact takes precedence above other matters, therefore, it can be argued that the local impact as described in this written representation forms part of that submission.

- 4.2 National Planning Policy Framework (NPPF), July 2021

The NPPF sets out at paragraph 130 that development should be “visually attractive and sympathetic to local character”. Also, in paragraph 28 it recognises the need to support diversification of agricultural land that helps to sustain an agricultural enterprise. This policy position should be taken into account when identifying sites for large scale solar panel development.

- 4.3 The Central Lincolnshire Local Plan 2023 – 2043 was adopted April 2023 and replaced the Central Lincolnshire Local Plan (adopted 24 April 2017).

The earlier 2017 document has been quoted and measured against by the Applicant, (EN010131/APP/3.1 Environmental Statement Volume 1 Chapter 10: Landscape and Visual Amenity).

- 4.4 It is considered by both Lincolnshire County Council and West Lindsey District Council that the current Central Lincolnshire Local Plan 2023 – 2043 is deemed ‘important and relevant’ for the purposes of section 105 and should be afforded significant weight in the decision making process. The 7000 Acres group agree with this assessment.
- 4.5 The 7000 Acres Group also agree that the DCO submission be examined in light of the relevant Local Plan Policies as cited by the Councils.
- 4.6 The Neighbourhood Plan of Lea is adopted and spans the period of 2017 – 2036. Lea is to the north of the Gate Burton site and covers the village of Lea and its surroundings to the end of Knaith Park. The Neighbourhood Plan provides ‘Community Objectives’. Objective 6 aims ‘to protect and, where possible, enhance the natural environment and open countryside and avoid coalescence with nearby settlements’.

5. Landscape and Visual Impact Methodology

Zone of Theoretical Visibility

- 5.1 The Zone of Theoretical Visibility (ZTV) identifies viewpoints and receptors affected by the Scheme. The ZTV covers a buffer zone up to 5km. The Applicant has based the ZTV on the height of the Solar Panel Areas at 3.5m and the height of observation at 1.5m.
- 5.2 To apply one observation height in the ZTV is inadequate in terms of study. There are many visual receptors, within this identified zone, that will observe and experience the GBS at varying heights. For example; travelling by train, in vehicles such as buses, vans or trucks or on horseback. There is a bridleway joining the corner of Marton Road, running parallel with the B1241, which travels up to the Order Limits of the development. Therefore, any visual

receptors along this bridleway will experience significant visual impact of the GBS. By excluding visual receptors at other heights (than 1.5m), the Applicant has failed to measure any impact on other visual receptors and so has not presented adequate information for the Examining Authority or Interested Parties.

- 5.3 Also, it is identified by AHH that there are anomalies in the methodology, parameters and modelling of the ZTV and subsequent lack of clarity in the presentation of visualisations.

6. Landscape and Visual Effects

Landscape Receptors

- 6.1 The West Lindsey area is a rural district with a largely agricultural landscape. The region grows significant quantities of high quality arable crops for the nation. The area is described as being 'a relatively expansive landscape, characterised by long views and dramatic skies', (West Lindsey Landscape Character Assessment (1999). This appraisal, although written some twenty four years ago, largely still stands the test of time and illustrates the unique landscape qualities of this area, which in themselves are timeless. The immediate and wider rural landscape is highly valued by residents and users. The locality is distinctive and has a sense of place.
- 6.2 The Landscape Character Baseline is submitted by the Applicant in volume 3, chapter 10-C Landscape Baseline EN010131/APP/3.3. It is a desk top study examining the National, Regional and Local Character Areas. Some field analysis of the Local Landscape Character Areas (LLCA) has been carried out by the Applicant.
- 6.3 The East Midlands Regional Landscape Character Assessment shows two defined Landscape Character Types as having a medium sensitivity of landscape receptors.
- 6.4 The Local Landscape Character Area 01: Gate Burton Estate has been identified as being of a high sensitivity. LLCA 02: Ancient Woodland Ridge, LLCA 05 - Somerby and Knaith Woodlands, LLCA 06 - Clay Farmlands, and LLCA 11 - Rampton Fringe and Hawk Hills have

been assessed as being of a medium sensitivity. The Applicant states that the 'Gate Burton estate and its associated landscape features are in good condition and give rise to a clear sense of place, due to the prominence within this LLCA. Therefore, overall, the value is High'. They go on to say that, 'susceptibility to change is High' and so there is a 'High value and High susceptibility to change' and 'overall sensitivity to the Scheme is High'. The 7000 Acres Group agree with the Applicants findings.

- 6.5 Both LLCA 01: Gate Burton Estate and LLCA 02: Ancient Woodland Ridge are within the Area of Great Landscape Value designation (AGLV).
- 6.6 There are two designated Areas of Great Landscape Value in the District. These are the Lincoln Cliff and the land to the north, east and south of Gainsborough. The majority of the Solar and Energy Storage Park to the west of the railway line is within the AGLV south of Gainsborough. It has been noted within the Landscape and Visual Review carried out by Lincolnshire County Council's appointed Landscape Consultants, AHH, that this area 'has not been identified as a receptor in its own right within the baseline' and concluded that they 'would expect this local designation would increase the value and susceptibility of landscape character within these areas'. This shows an omission in the assessment of the baseline and consequently any impacts and also measures to mitigate harm.
- 6.7 In addition, the radius of study area applied by the Applicant is an 8 km area. This zone falls short in some areas by only approx. 1km of the AGLV along the Lincoln Cliff. A wider study area has been considered up to 10km but has not been included in the main study area. Therefore, the extent and character of the Lincoln Cliff AGLV has not been incorporated into the LVIA in full and as such the true character of the surrounding area is not assessed, measured nor mitigated. We believe this is a major failing in the assessment and has consequential implications throughout the design proposals.

This lack of a full assessment is conveyed by the Applicant's own statement that the area has a 'lack of sense of remoteness'. However, AHH found that the area around Park Plantation and the PRoW along Knai/44/2 'have a character and perception very different than the surrounding open landscape'.

In light of this finding, the 7000 Acres Group argue that the qualities of the landscape character has not been fully assessed by the Applicant.

- 6.8 It is considered by the 7000 Acres Group that the capacity for landscape character change in the area is minimal due to the agricultural and open nature of the wider landscape. As such any material change in the landscape constitutes a notable change in the character.
- 6.9 It is apparent that sensitivity of landscape receptors at Regional and Local levels determines that a proposal of the scale and nature of the Gate Burton Scheme will have significant effects on the Regional and Local landscape character. The LCC LIR report adds that the Gate Burton scheme will have ‘a permanent and negative impact upon the landscape character and the appearance of the area as a consequence of changes to the current arable agricultural land use’. This in turn affects ‘the wider landscape character by replacing large areas of agricultural or rural land with solar development which affects the current openness and agricultural character of the area’.
- 6.10 West Lindsey District Council’s Written Representation states that the, ‘assessment of landscape assets does not appear to show regard for the local landscape character, including the impact on the designated Area Of Great Landscape Value (AGLV), and visual effects.’ In addition the Council continue that they, ‘are unclear as to why the applicant has continued to promote a project that has direct negative impacts upon it’.
- 6.11 The 7000 Acres Group agree with the Council’s statements. We believe the potential harm of the Gate Burton Scheme on the landscape character will be highly significant and lasting.
- 6.12 The design proposals of the scheme are evolving and elements of the scheme will change. As such, it is evident that the Applicants current Landscape and Visual Impact Assessment will not be reliable. The 7000 Acres Group requires the Applicant to carry out assessments and updates of the LVIA so that any changes to the scheme are clearly conveyed so that implications of these changes can be reviewed by all Interested Parties.
- 6.13 Both the landscape and visual effects are measured at four stages of development of the GBS. The four phases are; construction, operation (at year 1), operation (at year 15) and at decommissioning. At the stages of construction, operation (year 1) and operation (year 15), the Applicant has identified significant effects on three landscape character types within the

GBS. In addition to this, at year 15, two landscape character areas will suffer major and moderate adverse effects with established mitigation in place.

- 6.14 AHH convey that landscape character receptors will go through on the whole 'large alterations' and as such will suffer change of more than local significance' which in turn will be 'in breach of recognised acceptability, legislation, policy or standards'.
- 6.15 Also, the impact of significantly increased traffic on the rural landscape has not been fully assessed by the Applicant in the LVIA. Detail regarding vegetation loss and effects of transport on the wider landscape, have not been provided.
- 6.16 The 7000 Acres Group argue that this issue alone will have a negative impact on landscape and visual receptors far beyond the GBS Order Limits.

Visual Receptors

- 6.17 The Lincoln Cliff Edge is a well-known, distinctive and much admired landscape feature in the region. Views from the Cliff extend down to the Trent Plain and into Nottinghamshire. Fields of view are open and far reaching from the Cliff and from the plain back up towards the escarpment.
- 6.18 As discussed, the Zone of Theoretical Visibility (ZTV) specified by the Applicant covers a buffer zone up to 5km. The ZTV identifies receptors affected by the Scheme and viewpoints within this study area only. It has long been contended by residents that the visibility of the GBS is far reaching and beyond the limits defined by the Applicant.
- 6.19 AHH state that within the LVIA, seven groups/viewpoints were 'assessed as being of high sensitivity'. These include recreational users, vehicle users and pedestrians.
- 6.20 The assessment of visual effects carried out by the Applicant is along the same timeframe as the landscape effects, namely at; construction, year 1, year 15 and decommissioning. The LVIA has shown significant landscape and visual effects at all of the above stages of the proposed development.

- 6.21 The effects on views and visual receptors at close range to the GBS will be highly significant.
- 6.22 At year 15, when vegetation is mature, three visual receptor groups will experience significant residual effects at the southern extent of the site.
- 6.23 The Landscape and Visual Review by AHH, also states that the LVIA carried out by the Applicant ‘underplays the Magnitude of visual effect and subsequent of effect’ on various viewpoints.
- 6.24 The viewpoints discussed in the above report highlight a dependence of establishment and maturation of advanced planting and removal of vegetation for construction access creating ‘a large change in view’.
- 6.25 There is some criticism of the representation of the selected viewpoints in that the Applicant has not clearly represented the view.
- 6.26 The 7000 Acres group argue that the impact on visual receptors amounts to being highly significant. Residents and other users enjoyment of the landscape will be severely affected.

Cumulative Landscape and Visual Effects

- 6.27 The West Burton Solar Project, Cottam Solar Project and Tillbridge Solar Farm are proposed in close proximity to the Gate Burton Scheme.
- 6.28 The Applicant’s LVIA finds that there will be adverse cumulative effects with the above schemes. LCC’s landscape consultants assess that the ‘cumulative change to the landscape will be considerable, and the combination of two or more sites 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”.
- 6.29 The land use of the landscape will change from arable to solar, creating an “energy landscape” as opposed to rural/agricultural one at present. They add that 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’.

- 6.30 It has been understood by our members since they became aware of these proposals that the landscape in the region would drastically change from a rural, agricultural landscape to a solar landscape. This degree of change is not tenable. The subsequent degree of long term harm is not measurable.

7. Mitigation

- 7.1 The Mitigation of the GBS is dependent on findings in the current LVIA. If, as highlighted, changes are made to the Scheme then the LVIA and subsequent measures such as mitigation will be affected. In this instance, the current ‘worse-case’ scenario’s for the proposed and existing vegetation will no longer apply. Therefore, mitigation measures will need to be re-assessed and re-examined.
- 7.2 It is noted that the landscape screening for the GBS is the only mitigation utilised. The screening of the Scheme is subsequently solely dependent on the success of retaining and establishing vegetation.
- 7.3 This aspect of the design proposals not only undermines opportunity to enhance landscape character but it also has a compounding negative effect on areas inappropriately landscaped. For instance, the open intersected landscape character of this area will be significantly changed to a landscape populated by industrial infrastructure and proposed planting which will, if effective, enclose landscape and narrow views. Therefore, the mitigation measures alone will, if approved, harm the landscape character.
- 7.4 The establishment of planting will be severally impacted by grazing deer, brown hare and rabbit populations. With the displacement of birds of prey and foxes due to the proposed development, the population numbers of rabbits will increase exponentially in the immediate locality, therefore, the loss of newly planted vegetation will be significant. This in

turn will have a detrimental impact on any landscape mitigation measures which in itself compounds the loss of existing vegetation, due to removal for development and loss of the landscape area within the site boundary.

- 7.5 Extensive and persistent browsing of hedgerow and hedgerow trees is common knowledge in local communities. Establishment of planting in the landscape is haphazard.
- 7.6 The proposed solar panels will be 3.5m in height. There will be extensive security fencing, lighting, CCTV at 5m height, BESS at 4.5m height, substation at 13m height and warehouse and storage buildings up to 7.2m in height across the landscape. The Applicant has stated that they will maintain hedgerow at 3m height. With no leaf cover for approx. 6 months of the year and the evident short fall in maintained hedgerow height and *accepting* that establishment takes place, it is evident that the proposed screening does not screen in this first instance.
- 7.7 Lastly, the extent of the removal of the existing trees and hedgerow cannot be assessed as the Applicant has not specified the amount to be removed for construction access. So the plans indicating retention do not provide a sound basis for judgement of the proposed development.
- 7.8 The 7000 Acres Group argue that planting mitigation measures will not be effective and will harm the character of the landscape.

8. Biodiversity and Biodiversity Net Gain

- 8.1 The Gate Burton Scheme will cover the proposed site with solar panels and associated equipment as already described. The loss of a significant area of land, vegetation and habitats is a matter of grave concern to our members.
- 8.2 The GBS represents a monoculture of solar over land. The loss of land mass has a negative impact on biodiversity.

- 8.2 Biodiversity is under pressure from competing land use factors.
- 8.3 The proposals in the Gate Burton Scheme to remove existing and mature trees and hedgerows equate to immediate and extensive habitat loss. This leads to species loss and consequentially biodiversity loss as established trees and hedgerow already have a biodiversity value.
- 8.4 The subsequent planting of new and immature vegetation does not equate in biodiversity terms to the removed existing and mature vegetation. There is an immediate and lasting impact on biodiversity as the new vegetation takes several years to establish. These interventions equate to a biodiversity net loss.
- 8.5 Also, as previously discussed, the localised browsing of newly planted vegetation means landscape mitigation measures will be adversely affected. As such, claims by the Applicant that biodiversity will increase and net gains in biodiversity achieved are questionable.
- 8.6 The construction of the GBS will cause fragmentation and destruction of existing habitats above and below ground. The Applicant has not actively sought to link fragmented habitats and local wildlife sites.
- 8.7 The extensive groundworks for the cable route will also have a negative impact on biodiversity. The operation of the Scheme will cause continual disturbance.
- 8.8 The Applicant claims in their BNG Report, that the GBS is predicted to increase biodiversity by 70.95% for area based habitats, 37.24% for hedgerows and 14.22% for rivers. The claims of increased biodiversity by the Applicant are not explained within documentation provided.
- 8.9 Also, it is noted that the Applicant will use 95% of the solar array footprint for grassland. This blanket approach shows a lack of consideration for diverse habitat creation.
- 8.10 The landscape has opportunities without the GBS to improve biodiversity. Current and evolving Government Policies and Programmes mean that funding for biodiversity improvement schemes are available. This measure has not been factored into the equations

measured by the Applicant. Therefore, the baseline results and subsequent outcomes do not reflect comparable biodiversity factors.

- 8.11 The Department for Rural Affairs is currently reviewing the Biodiversity Metric. Consultation findings were published in March 2023. The new Biodiversity Metric 4.0 is expected to be mandatory in November 2023. The Gate Burton Scheme will be required to adhere to this new legislation and amend any subsequent biodiversity measures.
- 8.12 Amongst ecologists the Biodiversity Metric is regarded as not fit for purpose. Dr C J Betts states that the 'metric is not a substitute for expert ecological advice' and that the 'biodiversity metric unit calculations/scores are not scientifically precise or absolute values'. Also, that the 'metric is not in or of itself a solution to biodiversity decisions'.
- 8.13 Professor M. Adler in his paper, Biodiversity and Solar Farms, concludes that a 'lack of evidence relating to the ecological impact of solar farms is concerning' and that until future 'research is complete it would be premature to give approval for large scale solar schemes'.

9. Soils

- 9.1 National soil maps show there are predominantly two soil types within the Order Limits. The vast majority of the soil within the site is described as being 'slowly permeable seasonally waterlogged fine loam over clayey soils, or fine silty over clayey soils.' The ALC carried out by Land Research Associates (LRA) on behalf of the Applicant showed three main soil types.
- 9.2 The ALC findings supplied by the Applicant are not in line with MAFF 1988 Guidelines and Natural England Technical Information Note TIN049. Therefore, the ALC has not identified potential areas of BMV land. The land within the main site is expected to have a 20 – 60% likelihood of BMV land. This illustrates that only an industry standard ALC will provide robust findings and it is expected that the extent of BMV land will increase.
- 9.3 In addition to the above, the land within the cable corridor is at least 50% BMV land.

- 9.4 The Applicant has not explained the use of Best and Most Versatile land for the proposed development.
- 9.5 Local knowledge of the area has highlighted (in minuted meetings) that during last years (2022) abnormally hot and dry summer months, the arable crops in this area survived and were viable, in contrast to many other areas and regions. This shows that land which may be classed as 3B by the Applicant makes a special contribution to the environment, local economy and nation.
- 9.6 Also, with the loss of agricultural production for more than one generation (60+ years) there will be a negative impact on the farming industry and economy in the region. When this issue is considered in relation to the other three solar NSIP projects in the West Lindsey District, it is apparent that there will be a cumulative negative impact in this regard. It is noted that Lincolnshire County Council have concluded that; ‘as technology improves the solar infrastructure will be in place for longer than this and therefore the impacts are also much greater as potentially the GBS would result in the permanent loss of the agricultural land and so should not be seen as reversible.’ They also consider that; ‘there is a negative impact on BMV which is consequently contrary to the requirements of Policy S67.’
- 9.7 During construction of the GBS there will be significant damage to soil structure on heavy clay soils. The Review of Soils and Agricultural Land Classification Gate Burton Solar Project carried out by Landscape for Lincolnshire County Council, state ‘it is possible that long term drainage issues occur on the site due to the construction’.
- 9.8 The Applicant has not provided a soil management plan. This omission coupled with inadequate ALC findings, as described, determines that any long term soil issues and measures are not able to be assessed at this stage.
- 9.9 The scale and consequences of the proposed development presents questions to which we do not have the answer. Also, as the Applicant has not assessed implications of the proposed scheme for all soil life, we cannot begin to understand any potential impacts.

10. Mental health and wellbeing

- 10.1 Spatial Planning for Health: An evidence resource for planning and designing healthier places.

The above review states that ‘there is a very significant and strong body of evidence linking contact and exposure to the natural environment with improved health and wellbeing. For the purpose of this review, the natural and sustainable environment is comprised of neighbourhood ecosystems and the resulting co-benefits between the environment and health. Protecting the natural environment is essential to sustaining human civilization’ (PHE, Spatial Planning for Health 2017, pg. 38 (Ref 4).

- 10.2 In a response to the Department of Health and Social Care, 7 July 2022, the Landscape Institute (LI) ‘make the case that landscape and green infrastructure have a key part to play in supporting better mental health outcomes for communities everywhere’.

- 10.3 In regard to the Gate Burton Scheme the LI’s relevant statements to Government are that the:

‘access to green spaces and nature is a demonstrably effective tool to manage and prevent poor mental health, as well as to promote physical health and wellbeing’;

‘level of access to nature in urban areas varies, with disadvantaged communities generally less able to access high-quality green spaces’;

‘Green social prescribing is a welcome addition to the NHS approach, and there is scope to develop NHS estates to support the roll-out of programmes and activities’.

- 10.4 These above statements highlight that access and enjoyment of green space, either active or passive have a positive effect on mental health and wellbeing. There is a lack of access to quality green space in the nearby town of Gainsborough and therefore the surrounding local rural landscape is important to health. Green social prescribing is being promoted by DEFRA with the use of ‘walking schemes, dementia walks, community gardens, conservation volunteering, green gyms, and high-quality outdoor play areas’. The LI go on to say that, ‘creating spaces for recreation, connecting with others, and connecting with nature can play

a significant role in supporting mental health. Making these spaces accessible and in close proximity to local communities.....is crucial’.

- 10.5 The Environmental Statement for Gate Burton Scheme indicates that nine Public Right of Way (PRoW) routes may be temporarily diverted during construction. The term ‘temporary’ is open ended and so residents and users of the PRoW’s will have their enjoyment of their usual walks negatively impacted potentially for a lengthy and undefined period of time. There are four PRoW which may be diverted, impacting upon social cohesion (ES EN010131/APP/3.1 Environmental Statement Volume 1 Chapter 14: Human Health and Wellbeing).
- 10.6 This infringement on the health and social benefits people gain from the recreational value and use of PRoW’s, coupled with any cumulative effect from potential development of the Cottam, Gate Burton and West Burton schemes, means that people’s mental and health and wellbeing will suffer. This assertion by our group is corroborated by Lincolnshire County Council’s Local Impact Report where it states that ‘there would nonetheless be a negative impact to the users of the recreational value of various public rights of way as a result of the development with a change of experience from that of woodland and open fields to a more industrial landscape when travelling through the solar park with its associated infrastructure creating a feeling of enclosure rather than the current open landscape views’.
- 10.7 Therefore, the PRoW’s will no longer provide access to green space and open countryside but to an industrialised landscape.
- 10.8 We agree with the Applicant’s Environmental Statement that during construction of the proposed development, the impact on Human health and Wellbeing is negative.
- 10.9 We agree with the Applicant’s Environmental Statement that during decommissioning of the proposed development, the impact on Human health and Wellbeing is negative.
- 10.10 We do not agree with the Applicant’s Environmental Statement that during the operational stage of the proposed development, the impact on Human health and Wellbeing is assessed to be neutral. The landscape will be industrialised. As a consequence the enjoyment of the rural landscape is lost. The potential impact on people’s mental health and wellbeing with

the dramatic shift in setting may well be profound. Also, the relatively quick and traumatic transition from an expansive rural landscape to an expansive industrial will compound this negative effect.

- 10.11 Some members of the 7000 Acres Group have shared with us that they already feel anxious and worried about the prospect of these proposed solar developments and that their mental health and wellbeing has been harmed as a consequence. If the proposed development goes ahead, the likelihood is that these harms or negative effects will be worsened.

11. Tranquillity

- 11.1 Tranquillity is defined in the glossary of the third edition of the Guidelines for Landscape and Visual Impact Assessment (GLVIA) (LI and IEMA 2013) as ‘a state of calm and quietude associated with peace, considered to be a significant asset of landscape’.
- 11.2 Several residents have stated that the landscape across the GBS affords them a degree of peace. This in turn we equate to mean tranquillity.
- 11.3 It is acknowledged that there are various definitions of tranquillity, the Guidelines for Landscape and Visual Impact Assessment (LI and IEMA 2013), also convey that a ‘landscape may be valued for its perceptual qualities, notably wildness and/or tranquillity’.
- 11.4 It is clear, from the conversations the group has had with residents from the neighbouring villages to the GBS, they value the peace and quiet of the landscape setting and that the proposed negative impacts of the transport noise, construction and industrial development will significantly harm that degree of peace and/or tranquillity.
- 11.5 Also, it is noted that there is a high degree of tranquillity away from the A156.

12. Conclusion

- 12.1 This written representation has shown that the Applicant has failed on multiple occasions to provide robust and clear findings.
- 12.2 Significant impacts have been shown to affect the majority of the issues raised in this report.

- 12.3 Mitigation measures have been found to be inadequate.
- 12.4 Biodiversity and biodiversity net gain claims have been shown to be lacking validity.
- 12.5 Soil analysis results have also proven inadequate.
- 12.6 Impacts on mental health and wellbeing and enjoyment of the landscape as it exists have been highlighted.
- 12.7 Finally, the landscape as a whole is much loved and enjoyed by users and local communities. The members of our group regularly convey their dismay and disbelief that such a vast solar scheme is being considered to cover the landscape in our region. It is clear to our members that the harms significantly outweigh any perceived benefits and as such we continue to argue our case before the Examining Authority.

Bibliography

Alder, P. M., n.d. *BIODIVERSITY AND SOLAR FARMS*. [Online]
Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010118/EN010118-000503-Prof.%20Mike%20Alder%20-%20Other-%20Biodiversity%20Ecology%20and%20natural%20Environment.pdf>

AAH Consultants, June 2023. *LANDSCAPE AND VISUAL REVIEW OF THE DEVELOPMENT CONSENT ORDER APPLICATION FOR THE GATE BURTON SOLAR PROJECT FOR LINCOLSHIRE COUNTY COUNCIL*

Betts, Dr. C. J. December 2021. *BIODIVERSITY NOT SO NET GAIN*

Department for Environment and Rural Affairs, March 2023: CONSULTATION ON BIODIVERSITY METRIC, Government Response and summary of responses

Gate Burton Energy Park Environmental Statement Volume 1, Chapter 14: Human Health and Wellbeing, Document Reference: EN010131/APP/3.1

Gate Burton Energy Park Environmental Statement Volume 3, Appendix 10-C: Landscape Baseline, Document Reference: EN010131/APP/3

Gate Burton Energy Park: Biodiversity Net Gain Assessment, Document Reference: N010131/APP/7.9

Landscape Institute Technical Guidance Note 01/2017: Tranquillity – An Overview

Landscape Institute Technical Information Note 04 /2017: Soils and Soil-forming Material

Landscape Institute Technical Guidance Note 01/2020: Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)

Landscape, June 2023. REVIEW OF SOILS AND AGRICULTURAL LAND CLASSIFICATION, GATE BURTON SOLAR PROJECT. LINCOLNSHIRE COUNTY COUNCIL

Mental health and wellbeing plan Response from the Landscape Institute - Policy consultation response July 2022 for Department of Health and Social Care

Natural England Technical Information Note TIN049 "Agricultural Land Classification: protecting the best and most versatile agricultural land"

Spatial Planning for Health: An evidence resource for planning and designing healthier places.

West Lindsey District Council: Prosperous Communities Committee report, 11th July 2023

West Lindsey District Council Gate Burton Energy Park Local Impact Report (Draft) July 2023

West Lindsey District Council Gate Burton Energy Park, Written Representation (Draft) August 2023