

**Issue Specific Hearing 3 on Environmental Matters**

**Session 1: Landscape & Land Use**

**Submission from 7000Acres**

**This submission includes:**

- **Item 3: Character and visual amenity of area**
- **Item 4: Best and Most Versatile Land**

### **Item 3: Character and visual amenity of area**

At a fundamental level, it takes a lot of space to absorb energy from sunlight, therefore solar power is described as having an extremely low energy density. Therefore, to create a scheme of the huge capacity that is proposed by Gate Burton, a colossal amount of land is consumed. This is the key reason why the impacts on the Character of the Area, Visual Amenity, Agriculture and overall Land Use are so severe.

It is clear that development at the scale of Gate Burton will show significant harm to both landscape and visual amenity.

We understand that the Examining Authority has already made some visits to the area, and that further accompanied visits are being carried out. The EA will have had the opportunity to see what is described as an “expansive landscape, characterised by long views and dramatic skies” – the words of the West Lindsey Landscape Character Assessment.

Such open fields and long views mean that the landscape is highly sensitive to any large-scale development, resulting in a notable change in character.

The Applicant has commissioned consultants to undertake the documentation necessary to bring forward the project, but the desktop study, which, we understand included some limited field analysis, demonstrates a lack of understanding of the nature of the region.

In terms of Landscape Character and Visual Amenity, the Applicant’s baseline assessment has omitted Areas of Great Landscape Value from its assessment, by not considering the AGLV in proximity to Gainsborough in its own right, and by drawing the boundary of the main study area to exclude the AGLV at Lincoln Cliff.

The AGLV within the boundaries of the Order Limits of the Gate Burton scheme has a different character to the other areas, it is more intimate and peaceful and yet opens to the wide expansive landscape towards the ridgeline with big skies and softly undulating landform. The scenes are rural with agriculture as the predominant land use. The mitigation proposed by the Applicant will not enhance the landscape but will in effect create an obvious atmosphere of a failed attempt at screening industrial units which cannot be screened. In our opinion, the mitigation will compound the significant negative effects of the proposed development. Numerous Local Landscape Character Areas will be detrimentally effected to a relatively significant degree. Therefore, the proposed development removes variation in landscape character as well as removing the landscape in the area from view.

Placing vast swathes of 3.5m high panels in such a landscape, particularly in association with the removal of hedgerows to facilitate installation, cannot fail to significantly alter the landscape character of the area. The removal of existing, mature hedgerow and trees has an immediate negative effect on landscape value and character. This visual and amenity impact is worsened by the implementation of small specimen planting or ‘whips’ which will take many, many years to establish. Also, due to localised grazing and browsing, these mitigation measures will not be successful. We make this statement from experience.

The sequential effects of the proposed scheme whilst travelling around the area will give views of an industrialised landscape. These views will be incongruous to the area and leave viewers or receptors with a strange sense they have travelled to another world which is far removed from the one they thought themselves in, namely rural Lincolnshire. Again, poor mitigation will compound the negative impact of the sequential effects.

The senior partner acting for Pinsent Mason on behalf of the Applicant stressed that each scheme is distinctive, has different owners and shareholders and so cannot be viewed collectively. However, whilst technically this may be correct, it is not relevant as it makes no difference to observers/receptors in the area or indeed the landscape, which solar panel is owned by which company, we will see miles and miles of solar panels and associated equipment and buildings across the landscape as a whole. The landscape will be harmed as a whole. The wildlife will be harmed as a whole. There is no separation in the perception of the schemes for residents, passers-by, interested parties and visitors. The cumulative effect of this industrialisation is beyond measure and is unprecedented in this Country.

With the above assessment in mind, we agree with Lincolnshire County Council and West Lindsey District Council that the weight given to adverse landscape and visual effects needs to be paramount in the Examining Authorities appraisals and that the Local Impact Reports and the Central Lincolnshire Local Plan 2023 – 2043 (adopted April 2023) take precedence in terms of section 105 of The Planning Act 2008.

Another representative of the Applicant made comments that the landscape is already industrialised due to the presence of the West Burton Power Station. Whilst, this site is in itself industrial, it does not cover the landscape. It is a landmark.

Also, along with the Cottam Power station, over a period of less than 60 years these power stations have collectively produced 1000 Tera Watt Hours of reliable energy for the Nation. Thousands of lifelong jobs for locals were created plus countless offshoots of supply chains and subsidiary businesses.

In addition, by selecting the scale of development, and the panels of the size chosen, the developer has shown no sensitivity to the area or any material attempt to mitigate the impacts of the development, in favour solely of maximising the brief, peak capacity of the solar plant.

Solar is very late to the party in terms of renewable energy priorities for the Government; the ambition for 70GW of solar is only 18 months old. From what little guidance is available, land use is a clear consideration. Guidance typically first states that land used should be previously developed, brownfield land, contaminated land or industrial land. The Gate Burton Energy Plant uses none of these.

There is wriggle-room to use agricultural land, and the Applicant has clung on to the idea of land in the region not being “best and most versatile”, as a particular set of land grades.

Let us be clear: Using any land at such a vast scale comes with great responsibility, and there are very material considerations that must be addressed.

Most of the land is within the much-discussed sub-grades of what is, or isn't 3a or 3b land, nevertheless, quite apart from the technical classification, the land in the region is productive. What food, animal feed and crops for bio-fuels are grown on the land earmarked for Gate Burton will be displaced, and need to be grown elsewhere in the UK or imported.

At a time of growing fragility in supply chains arising from global tensions, such as war in Ukraine, or climate change effects, such as wildfires and floods, making inefficient use of our land is detrimental to UK society overall, in terms of adverse consequences for food security or additional carbon costs by raising food-miles.

The argument of this being a small proportion of overall farmland can't suffice. NSIP scale schemes have a voracious appetite for land, therefore the sustainability of how land is used at such scale must be considered in its broadest sense.

Crucially, the Applicant has failed to consider the need for agricultural land to be used for direct decarbonisation. In its 6<sup>th</sup> Carbon Budget, UK Climate Change Committee has stated that there will need to be a reduction in farmland to accommodate direct carbon reduction measures, through planting 30-70 thousand trees per year for decades and re-establishing peatlands.

Efficient land use is critical to ensure we can balance all the needs we have for our land, be that food production, water supply, recreation, visual amenity, housing, commercial development or energy.

There is a growing realisation in the UK that we must consider our use of land very carefully:

- This year's Skidmore Review recognises the increasing importance of managing land use as a part of decarbonisation, and the need for a clear plan for how we manage competing demands on land.
- The Campaign for the Protection of Rural England has called for new planning rules to guard food security.
- In February, the Royal Society published its Landscapes Policy Report, from which, the BBC concluded that the UK Government is already over-committing on land use.

Everything screams of a need for a co-ordinated approach...

The UK Government itself has now committed to develop a Land Use Framework for the UK this year.

The 4 NSIP schemes proposed in the Lincoln / Gainsborough area, would create a solar power region as large as any solar farm on earth, but perversely, in what is globally, one of the lowest areas of solar gain.

And while these schemes might have a similar peak rated Capacity in MW as in the Bhadla solar plant in the Indian desert... Bhadla would produce twice the volume of energy per year – and has displaced no such productive farmland.

In terms of resources at humanity's disposal, there is a basic sense test that is failed by consuming productive farmland in this way.

This context is important; the Applicant has consistently overstated the energy and decarbonisation benefits, as well as consistently understated the harms arising from ground-mounted solar development consuming land at such a scale.

Overall, there is a material question for the Examining Authority to consider, and perhaps for the Applicant too, which is this;

*Given the long track-record of the UK policy landscape calling for efficient land use and rooftop solar, why do rooftops continue to be built without solar, yet there a sudden rush for developers to pursue large-scale ground mounted solar projects?*

In our view, the answer is structural; it comes down to planning requirements and financial incentives.

For rooftops, there is no wholesale presumption to require solar as a part of planning, despite all the siren calls about climate emergency. And there is no financial incentive for anyone constructing a building to install solar. The income from solar generation will typically be received by the client, and adding solar, will add to the cost of construction, however marginally.

By contrast, for large-scale solar farms, an investor can take UK Government-backed Contracts for Difference, which provide investor certainty to build solar at any scale the planning system might allow. The strong economics of energy versus the weak economics of farming, make this an area vulnerable for exploitation by predatory investors.

The situation is one of a lack of economic opportunity and a planning system that continues to allow rooftops to be grossly under-utilised for solar.

In the last few years alone, the country could have had installed more solar capacity on rooftops than would be delivered by the wave of massive wasteful solar schemes this region faces.

This community should not be made to suffer the effects of this landscape of opportunistic economics and poor planning.

#### **Item 4: Best and Most Versatile Land**

The 7000 acres group does not have confidence in the Agricultural Land Classification data published by Land Research Associates Ltd for the Gate Burton Energy Park Project.

Whilst it is accepted that the current ALC survey system is out of date, it is still the basis for the fundamental classification of land. The climatic data that has been used is based upon the Climatological Data for Agricultural Land Classification, Meteorological Office, 1989. As we all know there has been a significant change to the climate recently and as such using data that is 34 years old will not give the same results as using current data. As grading of the land is related to the climate then Land Research Associates Ltd should carry out new tests based upon current data before deciding the land classification.

Land Research Associates (LRA) has undertaken an ALC for the proposed solar panel site. The survey was at a reduced scale of approximately 1 borehole per 2 hectares from the 1 borehole per hectare recommended in TIN049. It is normally expected that the ALC survey be undertaken in line with the MAFF 1988 guidelines and TIN049. These documents set out the precise methodology by which the ALC survey should be undertaken, with auger bore sampling at 1 hectare intervals and a suitable number of soil pits dug to determine the precise nature of the soil(s). The findings of the ALC report essentially identify over 80% of the site as Grade 3b. The majority of any BMV land is shown to be Grade 3a. As set out above the ALC report is not fully in line with the MAFF 1988 guidance, which recommends auger borings at 1 hectare intervals, and soil pits dug in representative soils types. The report is more in line with a reconnaissance survey. We recommend that a full and complete independent survey is carried out in accordance with MAFF 1988 and TIN049 guidance.

The Applicant's land use spokesperson stated that with increasingly hot summers the yield from 3B land is higher than 3A, as the clay content retains water. This supports the 7000Acre case that 3B land produces a high yield and must not be dismissed as poor quality land.