16 October 2023

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**Dear Sirs** 

## Planning Act 2008 (as amended) – Section 55 Application by West Burton Solar Project Limited Development Consent Order for West Burton Solar Project Written Representation (Deadline)

These representations follow on from my initial submission (dated 9 May 2023) as a registered 'interested party' for the purpose of the examination of the West Burton Solar Project Development Consent Order (DCO).

As noted previously, my serious concerns regarding this proposal relate to the significant adverse impacts that it would have both locally and on the region. As you will be aware, the West Burton Solar Project is one of four NSIP solar energy facilities proposed in West Lindsey, Lincolnshire. They fall within a 6 miles radius, and together, would cover some 10,000 acres of farmland (a proportion of which is Grade 3a and higher). If permitted they would become the largest solar complex in Europe and one of the most significant globally. Very worryingly, the top 12 applications for such schemes in the UK are currently in Lincolnshire (some 27% of the total) covering an area of 22500 acres equivalent to 64 Hyde Parks. Planning policy encourages large scale solar projects to locate on developed or lower value land. Can the use of such good quality land be justified?

Perhaps the most robust approach, by the determining authorities, would be to rank the various proposals in relation to their proximity to the future users of the energy and the existence of existing infrastructure, combined with their respective adverse environmental impacts. This logical ranking of the various schemes could then be used to positively guide a reduced provision in this area of Lincolnshire.

In addition, and on a more local level, my concerns and objections to this proposal relate in particular to the likely averse and cumulative visual impacts of this scheme, leading to significant harm to the character and cohesion of the rural landscape in the locality.

Broxholme is situated in a sensitive rural location where visual amenity is of particularly high value to the community and local residents such as myself. The solar electricity panels (photovoltaics) as currently proposed, will be over 4 meters in height and will be positioned only 10 meters from my home (a listed building and scheduled ancient monument). They will be clearly visible from the house and from the surrounding local area as a whole.

The scope for the consideration of possible mitigation measures, as previously discussed with the Application, appear to have been totally ignored.

Page 2

I am aware that the various LPAs involved in this process, in particular West Lindsey DC, Lincolnshire CC and North Kesteven DC, plus Broxholme Parish Council and the 7000 acres group, have all submitted relevant representations to the deadline 1 stage 1. I support and endorse the serious concerns they have raised.

In particular, and in relation to landscape and visual impacts, several main points on the project's adverse impact on the landscape and visual aspects have been identified.

These include the following;

**Cumulative Landscape and Visual Effects**: The assessments submitted by the application acknowledge that when combined with other solar projects, such as Gate Burton, Cottam and Tillbridge, there will be cumulative adverse effects on landscape character and visual amenity over a broad area even at the 15 year points. The scale and mass of these projects, when assessed sequentially, could lead to substantial changes in the landscape.

**Project Scale and Landscape Transformation**: The proposed solar project is of a massive scale and has the potential to significantly alter the character of the local landscape. The extensive spread of the proposals, including separate development plots and cable routes, would have a transformative negative impact on the landscape.

**Long Range Views**: Significant and specific concern has been identified about the long – range, open and panoramic views across the low-lying Till Valley, which includes views down onto large areas of the proposed solar development. This raises concerns about a significant material adverse impact on the visual character of the surrounding landscape namely, expansive landscape characterised by long views and dramatic skys.

**Visual Effects on Receptors**: The Landscape and Visual Assessment document, submitted by the application, identifies significant adverse effects on the views from various important receptors including local residents and those visiting the area. The introduction of a largescale solar farm, as currently proposed, is likely to drastically change the visual experience of the landscape for many.

**Mitigation Measures**: The applicant's submission documents (including the various Environmental Statement papers and the Landscape and Visual Impact Assessment) refer to the inclusion of mitigation measures, such as planting and screening, aimed at improving the landscape and ecological aspects. However, they also recognise the need for further detailed investigation and improvement of these proposals during the detailed design stages. Surely matters of such importance should be carefully addressed as this stage.

I understand that all the relevant LPAs will be submitting further representations at this deadline stage, and of particular importance, these will include Local Impact Reports (LIR). Once the LIR's are available, my landscape consultant and I will carefully consider the material submitted, and we will then make further Written Representations based on the technical analysis and our assessment of the facts.

I would also note at this stage, that there have been several recent Planning Appeals relating to Solar Energy Farm proposals, where the wider benefits have been considered to fail to negate the harms identified in respect of, inter alia, character and appearance, landscape and visual matters. These include:-

## Page 3

1. Appeal Decision relating to a solar farm on Land East of Pelham Substation, Maggots End, Manuden (Ref No S62A/2022/0011). It was dismissed on 11 May 2023. In that case, the benefits were considered to be; clearly outweighed by the harms identified, including in relation to landscape and visual matters.

The Pelham appeal decision goes further;

'the effect would be that the currently open, rural and agrarian character and appearance of the area would be drastically and noticeably altered with the introduction of an overtly utilitarian infrastructure into the open countryside (para 17). This would be highly contrasting industrial infrastructure that would be present for a extended period of around 40 years ...... would be perceived as permanent ...... accordingly the proposal would have a harmful effect on the rural character and appearance....adversely eroding the agricultural landscape and intrinsic beauty of the countryside (para 19).

2. DCS 200-012-044 Winterton 07.08.23 Allowed.....Impact was inevitable.....due to lack of elevated views of the site......and mitigation measures......harm limited.

3. DCS 400-042-260 West Wickham 22.09.23 Dismissed..... adversely affect unspoilt landscape. Instead of viewing pleasant open fields and panoramic views of the country side....row upon row of solar panels, utilitarian structures....at odds with the rural surrounds.

The LPA (Local Planning Authority) have tightly controlled planning in villages like mine and over 35 years have seen little material change. These NSIPs loop the LPA's control and fundamentally after the landscape character into a industrial landscape with dubious benefits from the DCO.

I would like to conclude by stressing my support for the development of renewable energy schemes within the UK, including solar, but they need to be focussed on appropriate, environmentally sustainable and viable locations.

The opportunity to discuss the matters raised with the relevant LPA's and the applicant would be very much appreciated.

I would be grateful for confirmation of receipt of this further representation.

Yours faithfully

Philip D Hodgkinson

