

7000Acres Written Representation

Response to the West Burton Solar Project Ltd, Environmental Statement: Chapter 8

Landscape and Visual Impact Assessment January 2023

Deadline 1A, 7th December 2023

Executive Summary

The West Burton Solar Project has negative impacts on the landscape character and visual amenity of the proposed sites 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 are considered.

Landscape and Visual Effects. Impacts of the West Burton Solar Project (WBSP) on Landscape Character and Visual Amenity are highlighted. Negative impacts are caused due to failings in the Applicants Landscape Character Baseline. The Applicant states that the WBSP will have significant beneficial effects on landscape character areas. These findings are incongruous.

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 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. Damage to soils during construction is highlighted.

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 West Burton Solar Project (WBSP) proposes to infringe the use of Public Rights of Ways (PRoW's).

Tranquillity. Peace and quiet is experienced by residents at the site. The CSP 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 are already being and will be directly and adversely affected by the industrial proposals.
- 1.2 The collective opposition to the proposals 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 West Burton Solar Project, 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 affected by the West Burton Solar Project (WBSP) for the Examining Authority. The contents of this document highlight certain issues, by drawing together the appraisal of the LVIA by Lincolnshire County Councils (LCC) Landscape Consultants, AHH and the Local Impact Reports by LCC and West Lindsey District Council (WLDC) and merging their review submissions with the ground observations of residents and Interested Parties. Further elements may be added in subsequent written representations as more information comes to light through the Examination process.

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

Barriers to Understanding the LVIA

Inconsistencies in Findings of the LVIA

LVIA Methodology

Landscape and Visual Effects

Mitigation

Biodiversity and Biodiversity Net Gain

Soils

Mental Health & Wellbeing

Tranquillity

3. Size, Locations and Duration of the West Burton Solar Project

- 3.1 This scheme is divided into three separate developments (West Burton 1, 2, and 3) collectively covering an area of approximately 1900 acres (760) of farmland and countryside with solar PV, battery storage energy plant and associated infrastructure. The Order Limits include and amount to a 480MW Solar Project. The cable routes between the sites and grid connection travels approximately 21.3 km. The life-span of the scheme is now predicted to be for a 60 year period.
- 3.2 West Burton 1 (91.32 ha) is located between the villages of Broxholme to the east and Bransby to the northwest. The site is predominantly arable farmland and adjoins the watercourse system close to the River Till. West Burton 2 (306.98ha) is located to the north of Saxilby village and lies to the west of West Burton 1. Again the area is mainly arable farmland. In some area the site adjoins the River Till. The B1241 runs north/south through West Burton 2 and in the south-east of the site, Broxhome Lane travels across the landscape in an east/west direction. West Burton 3 (370.78 ha) lies to the north west of West Burton 2

and is located between the villages of Brampton and Marton. Again the site is predominantly arable farmland. The A1500 Stow Park Road/Till Bridge Lane runs along the proposed northern boundary of West Burton 3 and Cowdale Lane runs along the southern boundary. Part of the public footpath Marton/68/1 travels along the northwest corner to the site. The train line between Lincoln and Gainsborough runs north-south between land parcels comprising the West Burton 3 site.

- 3.3 The cable routes will travel approximately 21.3km from the sites to the grid connection at the West Burton Power Station. The proposal for this route travels across predominantly agricultural land and will cross a number of key obstacles via the use of horizontal directional drilling. The key drilling sites are at the points at which the cable proposes to cross the River Till and the River Trent.
- 3.4 The area covered by the sites is predominantly arable agricultural land and so rural in setting and nature. Most of the farmland is classified as 3b, within the ALC grading system but the quality and yield of arable crops from this farmland is high. The value to the nation in terms of exports for Lincolnshire cereals alone this year was in excess of 300 Million Pounds sterling. The cable route has not been assessed in terms of soil survey or farming factors. It is also noted that significant parts of West Burton 3 are classed as Grades 1, 2 and 3b land.
- 3.5 Land drainage and flood management in these low-lying areas is a key factor to sustaining agriculture practices and protection of populated areas. The West Burton Solar Project falls within Flood Zones 1, 2 and 3. Parts of West Burton 1 and 2 fall within a Water Storage Area.
- 3.6 Due to the nature of the solar scheme being spread over three separate sites across a wide area in the West Lindsey District, there are several Public Right of Ways (PRoW's) affected and or temporarily stopped by the proposals. In Section 18 of the dDCO; for the temporary closures, there does not appear to be any notice periods or time frames for diversions and closures included in Article 11 or the OPMP. The Applicant refers to 'reasonable' time frames for closure. This wording is in itself *unreasonable* in that it provides no time limit or understanding of the time the closures will be imposed.

Along with these designated PRoW's, local roads are utilised for recreational use by walkers, horse-riders, cyclists and indeed facilitate local rallies and events, therefore, impact to communities and visitors enjoyment of the surroundings is a significant factor. Consequently, mental health issues are a major concern.

- 3.7 The design principles of the West Burton Solar Project and subsequent methodology utilised to develop the scheme has not been clear. Therefore, the site selection process has been established on land availability rather than design and assimilation into the landscape. This has meant that assessment of site alternatives has not sufficiently been carried out. There are three separate areas covered by the West Burton Solar Project and as such an extensive area of farmland and countryside is affected by the proposed scheme which in turn means that many communities and villages will detrimentally affected.

4. Planning Issues

- 4.1 It is considered that no National Policy Statement (NPS) has effect in relation to section 104 of the Planning Act 2008. Therefore section 105 of the Act 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)

The NPPF published in 2012 and updated in 2018, 2019, 2021 and 2023 states that it does not contain specific policies for Nationally Significant Infrastructure Projects.

However, West Lindsey District Council consider that the NPPF ‘provides guidance on the requirement for good design, promoting healthier communities, conserving the historic environment, conserving the natural environment, sustainable transport and meeting the challenges of climate change. With due regard to the scope of the policy at a national level, WLDC consider the NPPF to be an important and relevant matter for the determination of the application under section 105 of the PA2008’ (WLDC LIR, p23 4.34).

- 4.3 The Central Lincolnshire Local Plan 2023 – 2043 was adopted April 2023 and replaced the Central Lincolnshire Local Plan (adopted 24 April 2017).
- 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 agrees that the DCO submission be examined in light of the relevant Local Plan Policies and Neighbourhood Plans as cited by the respective Councils.

5. Barriers to Understanding the Landscape and Visual Impact Assessment

- 5.1 The Applicants Draft Development Consent Order specifically cites the provision to remove **all** trees and hedgerows within the Order Limits and beyond to facilitate the proposed development. The Landscape and Visual Impact Assessment claims retention and enhancement of trees and hedgerows within the same areas. The subsequent findings of the LVIA are based on this premise. The contradiction of these two fundamental documents means that neither is valid at present. Subsequently, if changes are made to either document in the Examination process, clear and coherent measures and findings need to be submitted by the Applicant to offer all parties any scrutiny of results.
- 5.2 There are several barriers to understanding the information provided in terms of presentation, not using plain language and moreover not following issues identified at the baseline through stages of the methodology process to the findings and results.

5.3 AHH Planning Consultants appointed by Lincolnshire County Council, to review the LVIA, state that, the volume of information and cross referencing appendices, ‘makes the identification and clear understanding of key landscape and visual findings, as well as providing succinct review comments, difficult. The main LVIA chapter alone is some 252 pages with limited summary or narrative of effects to communicate the main findings, relying in places multiple statements cross-referencing large appendices or supporting documents. This makes the document in places difficult to follow, at odds with the recommendations offered within the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3), which is the acknowledged primary guidance document on landscape and visual assessment’(2.1).

This is a professional appraisal. If an expert in this field finds the material ‘difficult’ to understand, residents are afforded no real chance. This highlights the magnitude of difficulties and barriers to understanding resident’s experience. This failing of the Application material is prejudicial to our members and members of the public in the region. In effect, they become excluded from understanding the information provided. This ultimately means that they cannot engage fully in the Examination process and so representations to the Examining Authority and subsequently the Secretary of State are less informed. Many of our members have expressed great frustration at not being able to interpret and understand the information submitted by the Applicant. It seems clear that if the professional teams of consultants employed by the representative Councils find it ‘difficult’ to navigate and understand the information, members of the public and effected residents do not have much chance in doing so. This aspect is a major failing in the Application submission.

6. Inconsistencies in the Findings of the LVIA

6.1 The extensive volume of information in the LVIA report and appendices creates a problem in itself to convey the meaning and reasoning of the report. AHH state that (2.1) ‘The LVIA does not currently clearly express the author's judgement about changes to the landscape and views from the implementation of the development.’ 7000 acres argue that this is the underlying purpose of the LVIA and so to omit this judgement means the LVIA fails to meet

its purpose. Also, the veins of reasoning are lost in the body of material. The parameters of the development proposals have not been clearly expressed by the LVIA and so the basis for the LVIA is lost. The intention described in the LVIA is to retain and enhance trees and hedgerows in relation to the Scheme. The Draft DCO is applying for the removal of all trees and hedgerows as mentioned. Therefore, the basis of the LVIA is undermined as all landscape findings and recommendations refer back to the retention of trees and hedgerows and vegetation enhancement. No landscape plans show the removal of all trees and hedgerows. The mitigation programme is based solely on vegetation measures and so this programme through all phases of the proposed Scheme, will be baseless if this element of the Draft DCO stands.

The 7000 Acres Group strongly objects to the possibility of all trees and hedgerows within the Order Limits and beyond to be removed. The Applicants statement in this regard holds no credibility or validity. Members have expressed shock and disbelief at this possibility.

- 6.2 In addition to the previous concerns discussed, all visualisations in the LVIA show the retention of the majority of trees and hedgerows during all phases of the Scheme. If the 'worst-case' option to remove all trees and hedgerows is employed then these visualisations completely misrepresent the Applicant's proposals and intentions to all parties involved.
- 6.3 The Applicant claims that at various phases of the West Burton Solar Project there will be an improvement to local and regional landscape character. This claim is entirely illogical and is discussed later in this report.

7. LVIA Methodology

- 7.1 This is presented in Section 8.1 of the Landscape and Visual Impact Assessment. The 2km Study Area for each of the separate sites including infrastructure, substations and energy storage areas are considered appropriate by the Applicant as it is not expected that effects on local landscape character and key visual receptors will experience significant effects. The 7000 Acres Group argues that this expectation in the first instance, limits the scope of study area and potential significant effects on multiple receptors.

7.2 The 2km Study Area is based on the visibility of the Scheme. Due to the existence of separate sites across a large geographical area in the West Lindsey District, the visibility of the Scheme as whole covers an expanse of land that means multiples of 2km Study Areas are conjoined. The justification for the 2km limit is given in relation to the existence and retention of a strong framework of hedgerows and tree cover amongst other things. If the Rochdale Envelop is adopted and the Draft DCO approved, then the 'worst-case' scenario of the removal of all trees and hedgerows (including TPO'd trees) in the vicinity of and extending beyond the Order Limits, will mean that the parameter of the 2km Study Area radius is fundamentally flawed and that visibility will extend beyond this distance and in turn significantly affect many sensitive receptors across the District. These sensitive receptors include Landscape Character Areas, such as the Ridge Area of Greater Landscape Value (AGLV) and the historic and internationally important Lincoln Cathedral and Castle, (see image).



The image was taken on the 30th September 2023 and illustrates the presence and dominance of the Cathedral and Castle over the Lincolnshire landscape. The Cathedral is visible for many miles, its purpose being to draw pilgrims and visitors from far and wide.

7.3 It is noted that the West Burton Solar Project will spread over 15km therefore its reach in terms of visibility is extensive across the wider landscape.

7.4 The Zone of Theoretical Visibility (ZTV) Methodology states that existing woodland and large areas of vegetation have been utilised into the Digital Terrain Model (DTM). Given that removal of all trees and hedgerows has been written into the Draft DCO, then this modelling is potentially baseless. AHH state (3.8) that 'it needs to confirmed if this removal'...of the all trees and hedgerows...'has been considered within the ZTV information.'

8. Landscape and Visual Effects

8.1 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, users and visitors. The locality is distinctive and has a sense of place.

8.2 The Landscape Character Baseline is submitted by the Applicant in Chapter 8.5 of the LVIA. It is a desk top study examining the National, Regional and Local Character Areas. From these, 4 Regional Character Areas (from the East Midlands Regional Landscape Character Assessment), 9 Local Character Areas (from the West Lindsey Landscape Character Assessment), 3 Trent Vale Landscape Character Areas (from the Trent Vale Landscape Character Assessment) and 1 Historic Landscape Character Zone (from the Historic Landscape Characterisation Project: The Historic Character of The County of Lincolnshire). These assessments are at a large scale and so a more detailed landscape characterisation

was carried out. From this, 8 further landscape receptors or individual contributors to landscape character were identified.

Due to the scale of the West Burton Solar Project, the large amount of information prevents an understanding of the overall landscape character of the study area. Again, barriers to information occur as the process of cross-referring the many tables and pages means a clear picture isn't presented.

8.3 The landscape baseline identified no character areas or contributors that were of high sensitivity or susceptibility to effects. This is an unexpected finding and warrants further scrutiny.

8.4 There is a designated Area of Great Landscape Value along the Lincoln Cliff. This designation indicates that the landscape along and across from this linear feature is a high sensitivity receptor. Due to the reach of the West Burton Solar Project it is reasonable to argue that these areas of high sensitivity will be negatively affected (see image).



This image was taken in May 2023, from the B1398 (Middle Street) in a West North Westerly direction, with the village of North Carlton in the foreground. The Cottam Power Station is a landmark near the horizon line with the Trent Valley and open landscape in the mid ground. This agricultural area is proposed to become part of the West Burton Solar Project. The open and panoramic views across the landscape show how the Lincoln Cliff AGLV in the immediate foreground is visible in the panoramic scene.

West Lindsey District Council's Written Representation (5.61) states that, 'The West Burton Solar Project scheme will cause significant harm to the landscape character of the area, altering it from its agricultural use and character potentially irrevocably. The visual effects on communities are visitors will be significant'.



This image is taken in May 2023 from the Tillbridge Lane Viewpoint across the agricultural landscape in a westerly direction towards the Cottam Power Station. The A1500 travels through this landscape. Views are expansive and clear. It is noted that the West Burton Solar

Project does not join the National Grid at the Cottam site but is proposed to cut across the landscape North Westerly to the West Burton Power Station site and as such will cause further harm to the landscape.

- 8.5 The Applicant identifies in the LVIA that at the four phases of the West Burton Solar Project, there will be significant beneficial effects on landscape character areas. AHH (4.10) state that; ‘We are not in agreement with some of the findings of the landscape assessment, and do not see any appropriate justification for assessing significant beneficial landscape effects on landscape character areas by the construction and operation of a large solar development.’

The 7000 Acres Group agrees with this statement by AHH. To cover thousands of acres of landscape with industrial units cannot have a beneficial effect on landscape character. Also, as stated if the Draft DCO element of the removal of all trees and hedgerows is to be implemented, these findings by the Applicant illustrate skewed and bias results.

West Lindsey District Council considers these results as ‘erroneous, failing to reflect the conclusions reached in other ESs for similar projects.’ (Written Representation para 5.63).

- 8.6 Furthermore, the industrial development of the landscape will (paragraph 4.11, AHH) “bring about an extensive change on land use...and subsequently the openness and perception of solar development: creating what may be perceived as an ‘energy landscape’ as opposed to rural or agricultural one at present, which is a complete change of character.”
- 8.7 Lincolnshire County Council from September 2023 is embarking on an ambitious woodland creation programme and will be planting 750,000 trees over coming years across the County. This strategy will be carried out in conjunction with many partners and stakeholders across the County to implement sensitive woodland and habitat creation schemes which assimilate into the landscape and promote accessibility and healthy living.

The proposed West Burton Solar Project will directly and indirectly impinge on this programme of tree planting in the County. Moreover, the West Burton Solar Project is advocating removing all trees and hedgerows in its wake as we know. Therefore, diverse

habitat creation which will add to the current ecological and environmental make-up of the locality from this woodland creation programme will in effect be detrimentally effected due to the proposed expanse of the solar industry across the landscape instead. Therefore, this shows that other positive land use changes in the County will not be feasible or as effective due to the solar industrialisation from the proposed West Burton Solar Project and further proposed Solar NSIP in the District.

- 8.8 The beneficial landscape effects promoted by the Applicant are mainly based on the mitigation planting. This analysis is deemed as providing 'an unbalanced judgement as to the benefits of the scheme' (para. 4.12, AHH).
- 8.9 The failings of the LVIA continues, highlighted in the AHH Review, in Operation (Year 1), with beneficial effects being assessed in relation to landscape receptors (Land Use at West Burton 1) again based on mitigation planting.

Our members are aware of the difficulty of establishing landscaping in the area due to grazing and browsing. To suggest that at Year 1 that there are beneficial effects in terms of landscape receptors due to mitigation planting is not credible. The Planning Consultants, AHH, (4.13) state they, 'we disagree with the judgement that any beneficial landscape effects would be achievable at the stage through the development of a large-scale solar farm.' Also, at (4.15) 'we judge that the scheme would lead to significant adverse effects on landscape character at all phases. The Development has the potential to transform the local landscape by altering the character on a large scale. This landscape change also has the potential to affect wider landscape character, at a regional scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness and agricultural character that are identified as key defining characteristics of the area'. They add that; 'As well as the panels and associated equipment, the presence of extensive fencing and CCTV would be out of character with the wider rural area.'

- 8.10 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. The mass

and scale of the proposed development would in our opinion have a significant adverse effect on landscape character.

Lincolnshire County Council agrees in their Local Impact Report (16.4) that there will be 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'.

- 8.11 Due to the many anomalies and extraordinary findings of the LVIA, the Planning Consultants at AHH recommend that the 'Examination process now provides the opportunity to develop a clearer and more succinct identification and summary of the key landscape and visual issues and effects.'

The 7000 Acres Group argues that this statement illustrates that the Landscape and Visual Impact Assessment in its current form is not fit for purpose.

Our opinion is shared with West Lindsey District Council in their Written Representation (Paragraph 5.65) where they state they 'have significant concerns about the adequacy of the LVIA assessment and the conclusions it reaches. The LVIA impacts are clearly, in WLDC's view, adverse both in terms of the scheme in solus and cumulatively with other projects. As the Gate Burton project has correctly concluded adverse impacts, the legitimacy of the West Burton assessment is questioned. WLDC does not consider that the impacts assessed are valid and they should not be taken into the overall planning balance.'

- 8.12 The implementation of landscape vegetation is the main focus of mitigation for the Scheme. An overriding landscape characteristic of the area is the wide and open land form. To purely rely on landscape planting to obscure views of solar structures and industry means that the landscape and views become enclosed and narrow and planting becomes a defining detrimental characteristic. Conversely, if any of this planting is unsuccessful any *claimed benefits* will not be achieved. It is therefore apparent that such a proposed development cannot be readily assimilated into the landscape as demonstrated by the Applicants own convoluted reasoning and mitigation approach. To add further to this view, the Draft DCO claims all tree and hedgerows will be removed. The 7000 Acres Group is at a loss to comprehend the Applicants landscape approach. The statement in the Draft DCO is not

reflected in the findings of the LVIA. Also, AHH, have found that the (4.21) 'construction landscape effects may be underestimated within the LVIA through the omission of the assessment of the existing vegetation potentially affected, both its existing contribution and changes resulting from its loss. We strongly recommend limiting the loss of existing vegetation along site boundaries for access or sight lines, or along construction access routes, as this has the potential to change the character of the local landscape beyond the limits of the development, as well as increasing the visibility of the development.'

The 7000 Acres Group finds that to advocate that the landscape character will improve with the development of large scale solar industrialisation in the area is illogical. The Applicant's LVIA is unreliable.



This image was taken in May 2023 in a West South Westerly direction from the B1398 in between North and South Carlton. The wide expansive landscape is enjoyed both passively and actively by users. In the mid foreground a dog walker is walking with their dog along a Public Right of Way.

- 8.13 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 as visible within the previous photographs.
- 8.14 It is noted that the Applicant has found significant effects for close-range views of the proposed development. AHH add (5.10) that all the residual significant effects in the LVIA chapter were judged to have significant beneficial effects, however within Appendix 8.3 these are subsequently judged to be adverse – this needs clarifying in a simple table to allow for clear identification of the significant visual effects of the development.’ They then go onto say that they ‘disagree with the summary findings of the LVIA that any of the views would be improved over the baseline by the implementation of a large-scale solar development across an open agricultural landscape.’
- 8.15 The 7000 Acres group argue that the negative impact on visual receptors amounts to being highly detrimental and adverse. Residents and other users’ enjoyment of the landscape will be severely affected.

Cumulative Landscape and Visual Effects

- 8.16 The Cottam Solar Project, Gate Burton Energy Park and Tillbridge Solar Farm are proposed in close proximity to the West Burton Solar Project. A further NSIP Solar Project has been recently launched. The One Earth Project will fall within the West Lindsey District near Newton on Trent and will spread into Bassetlaw and Newark and Sherwood Districts in Nottinghamshire. There are now 11 proposed Solar NSIP’s in Lincolnshire as a whole listed on the National Infrastructure planning website at various stages within the regime. The proposed landscape change to the region and locality is overwhelming. It is evident that each Scheme will have compounding effects on the others and yet the Applicant had stated that

there will be no significant effects in Landscape Character at National and Local levels and minor beneficial effects were judged for Land Use at year 1 and 15 of operation. West Lindsey District Council (Written Representation, 5.131) state 'that such impacts cannot be deemed 'beneficial' due to their obvious harm as alien features in the countryside have a significant adverse impact upon both visual amenity and landscape character.'

- 8.17 In contrast to the findings for the West Burton Solar Project LVIA Cumulative Landscape and Visual Effects and Residential Effects Amenity Assessment, the Gate Burton Scheme has assessed there to be a moderate adverse impact based on cumulative impact of the West Burton, Tillbridge Solar and Cottam Solar schemes.
- 8.18 Lincolnshire County Councils consultants, AHH, found (paragraph 6.5) 'that the cumulative change to the landscape will be considerable and significant, 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. The cumulative impact of the four adjacent NSIP scale solar schemes has the potential to affect the landscape at a regional scale through predominantly a change in land use: from arable to solar, creating what may be perceived as an 'energy landscape' as opposed to rural or agricultural one at present.'
- 8.19 It has been understood by our members since they became aware of these proposals that the landscape in the region could 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.
- 8.20 These harms or effects will be compounded when travelling through the locality and region. AHH state (paragraph 6.7) that there will be a 'perception of being surrounded by solar development. Views do not have to be extensive and open to create the perception, and regular sequential glimpsed views would create a change to the experience of visual receptors as well as change the perception of character of an entire area.'

9. Mitigation

- 9.1 The Mitigation of the West Burton Solar Project in the LVIA is dependent on findings in the current LVIA. If changes are made to the Scheme then the LVIA and subsequent measures such as mitigation will be affected. Therefore, mitigation measures will need to be re-assessed and re-examined. If all trees and hedgerows are to be removed as stated in the Draft DCO then mitigation measures are obsolete.
- 9.2 It is noted that the landscape screening for the West Burton Solar Project is the only mitigation utilised. The screening of the Scheme is subsequently solely dependent on the retaining and establishing vegetation. AHH state (Paragraph 7.1) that there is an 'over reliance upon planting just to screen proposals, without full attention to the potential impact of screening on this landscape. The LVIA and appendices do not go into detail about how the level of care to ensure the design of mitigation enhances the physical landscape, or views from receptors, and seems to be focussed only on screening the development.'
- 9.3 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.
- 9.4 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.
- 9.5 Extensive and persistent browsing of hedgerow and hedgerow trees is common knowledge in local communities. Establishment of planting in the landscape is haphazard.

- 9.6 The proposed solar panels will be 3.5 and 4.5m in height. In some Flood Zone areas the panels will be raised further. There will be extensive security fencing, lighting, CCTV, BESS, substations, warehousing and storage buildings varying in heights above the height of the mature hedgerow line across the landscape. With no leaf cover for approx. 6 months of the year and reflecting that plant establishment will be difficult to achieve, it is evident that the proposed screening will not be effective.
- 9.7 The extent of the removal of the existing trees and hedgerow cannot be assessed as the Applicant has provided conflicting statements. The plans indicating retention do not provide a sound basis for judgement of the proposed development when considered with other documentation such as the Draft DCO.
- 9.8 It is noted that the Management Plan (AHH, Paragraph 7.5) 'is highly dependent upon the successful management and maintenance of the new planting, as well as protection of existing trees and hedgerows.' Also, the Management Plan covers a period of 5 years only. If the schemes life span, as we are advised, is for approximately 60 years, it seems incongruous that no further Management Plan beyond a 5 year period exists. This is particularly pertinent in that 'the landscape and visual effects are being assessed at 15 years' with findings of the LVIA being projected from successful implementation of the aforementioned Landscape Management Plan.
- 9.9 The Public Rights of Way (PRoW's) in and around the sites which constitute the West Burton Solar Project have open aspects with short and long distance views. If the proposed hedging and mitigation measures are implemented, it is arguable that loss of landscape character and enjoyment of the landscape will occur.
- 9.10 The 7000 Acres Group argues that planting mitigation measures will not be effective as suggested in the LVIA and will harm the character of the landscape. If all trees and hedgerows are removed in relation to the West Burton Solar Project as stated in the Draft DCO, the negative effects on the environment, regional and local landscape character will be immeasurable.

10. Biodiversity and Biodiversity Net Gain

- 10.1 The West Burton Solar Project will cover an expansive area of the landscape with solar panels and associated equipment as already described. The loss of multiple and significant areas of land, vegetation and habitats is a matter of grave concern to our members.
- 10.2 The WBSP represents a monoculture of solar over land. The loss of land mass has a negative impact on biodiversity.
- 10.3 Biodiversity is under pressure from competing land use factors.
- 10.4 The proposals in the West Burton Solar Project to remove existing and mature trees and hedgerows equate to immediate and extensive habitat loss and indeed to potentially eradicate all trees and hedgerows in the vicinity of the sites of the WBSPP is significant in terms of Biodiversity. Removal of established vegetation means species loss and consequentially biodiversity loss as established trees and hedgerow already have a biodiversity value.
- 10.5 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.
- 10.6 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.
- 10.7 The construction of the WBSP will cause fragmentation and destruction of existing habitats above and below ground. West Lindsey District Council state in their Local Impact Report (Paragraph 8.1.1) that the Applicant is 'unclear' in their description 'whether a cumulative significant effect could result.' The Applicant describes the WBSP has the potential for increased temporary, but medium/long-term fragmentation or disturbance effects on species like bats, badgers, hedgehogs, reptiles, amphibians and harvest mice which utilise field

margins especially.' The 7000 Acres Group agrees with WLDC that this statement is ambiguous and open to interpretation and as such not adequate.

- 10.8 The landscape has opportunities without the WBSP 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.
- 10.9 The Department for Rural Affairs has reviewed the Biodiversity Metric. The findings were published in March 2023. The new Biodiversity Metric 4.0 is in the process of becoming mandatory. The West Burton Solar Project will be required to adhere to this new legislation and amend any subsequent biodiversity measures.
- 10.10 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'.
- 10.11 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'.

11. Soils

- 11.1 National soil maps show there are predominantly two main soil types in relation to the West Burton Solar Project. The two soil types are described as 'slowly permeable seasonally waterlogged fine loam over clayey soils, or fine silty over clayey soils.' (Lincolnshire County Council, Review of Soils and Agricultural Land Classification West Burton Solar Project, November 2023 by Landscape, Land & Property Management).

- 11.2 The ALC findings supplied by the Applicant are in general in line with MAFF 1988 Guidelines and Natural England Technical Information Note TIN049. The findings of the ALC report essentially identify 73.5% of the site as Grade 3b, 22.8% as 3a, 1.3% as grade 2 and 2.3% as grade 1. Therefore, there is a significant amount of BMV land within the Order Limits.

The 7000 Acres Group argues that a full ALC needs to be carried out to identify the Grades and land quality in the WBSP. The current assessment does not fully test the area.

- 11.3 The land within the cable corridor is not estimated in the Applicant's ALC Report or Environmental Statement. Members of our Group farm and grow viable crops within the land allocated for the cable corridor. The crop yield is high. It is expected 'that 20-60% of the cable route will be BMV' (Landscape, Paragraph 6.0).
- 11.4 The Applicant has not explained the use of Best and Most Versatile land for the proposed development.
- 11.5 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.
- 11.6 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.'
- 11.7 During construction of the WBSP, Landscape (Paragraph 8.0) have considered that soil structure 'can be significantly damaged during the construction phase of the process. There is a lot of trafficking of vehicles on the land to erect the panels and if this work is undertaken

when soils are wet, there can be significant damage. Much of this damage can be remedied post construction, but not all and it is possible that long term drainage issues occur on the site due to the construction.'

- 11.8 Several of our members are involved in farming in the region. They advise us that the landscape produces high yields of good quality crops regardless of any perceived ALC grade. Landscape state (Paragraph 7.0) that Lincolnshire is very much an agricultural area 'with substantial areas of land within the Best and Most Versatile category. Much of the non BMV land will be Grades 3b, and only some Grade 4 with very little Grade 5.'
- 11.9 The Applicant has not assessed implications of the proposed scheme for all soil life.

12. Mental Health and Wellbeing

- 12.1 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).
- 12.2 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'.
- 12.3 In regard to the West Burton Solar Project 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’.

- 12.4 These above statements highlight that access and enjoyment of green space, either active or passive have a positive effect on mental health and wellbeing. 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’.
- 12.5 The Environmental Statement for West Burton Solar Project indicates that there are several Public Right of Way (PRoW) routes that will be temporarily stopped and/or diverted. 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.
- 12.6 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 Gate Burton, Cottam and Tillbridge Schemes, means that people’s mental and health and wellbeing will suffer.
- 12.7 Therefore, the PRoW’s will no longer provide access to green space and open countryside but to an industrialised landscape.
- 12.8 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.

13. Tranquillity

- 13.1 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’.
- 13.2 Several residents have stated that the landscape and green space affords them a degree of peace. This in turn we equate to mean tranquillity.
- 13.3 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’.
- 13.4 It is clear, from the conversations the group has had with residents from the neighbouring villages to the West Burton Solar Project, 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.

14. Conclusion

- 14.1 This written representation has shown that the Applicant has failed on multiple occasions to provide robust and clear findings.
- 14.2 Significant impacts have been shown to affect the majority of the issues raised in this report.
- 14.3 Mitigation measures have been found to be inadequate.
- 14.4 Biodiversity and biodiversity net gain claims have been shown to be lacking validity.
- 14.5 Soil analysis results have also proven inadequate in terms of yield.
- 14.6 Negative impacts on mental health and wellbeing and enjoyment of the landscape as it exists have been highlighted.
- 14.7 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.

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