7000 Acres

7000 Acres Response to the West Burton Solar Project Ltd Application on the subject of:

Socio-Economics and Land Use

Deadline 1A Submission – 7th December 2023

Executive Summary

Methodology – Study Area and Geographical Range Considered:

Within the Environmental Statement (ES), the Applicant has, through careful selection of the Study Area and ranges of impact, sought to create an impression of limited impacts of the scheme on the area:

- The Study Area used by the Applicant to reference baseline conditions has been chosen very widely, across Bassetlaw and West Lindsey, thereby avoiding having to highlight the specific socio-economic difficulties of Gainsborough, the nearest town to much of the West Burton Solar Project (CSP)
- The same breadth of area has been used by the Applicant as reference area for considering employment and economic activity, which has an averaging effect on the assessment, and therefore also fails to highlight the specific socio-economic difficulties of Gainsborough.
- The Applicant has therefore failed to consider the immediate impacts on communities closest to the proposed scheme.

Deprivation:

To carry out a of socio-economic review of the area around the WBSP and not acknowledge or address the deprivation issues of Gainsborough is either misleading, partial, or superficial, and should further serve to render the assessment inadequate.

- The ES is misleading in its description of the region, in terms of economic activity, and education, concluding these to be consistent with regional and national rates. Considering the area with a greater level of resolution shows the significant scale of deprivation issues facing the community of Gainsborough.
- The ES tries to equate the improved wealth of a few land owners through uplifted ground rent to a wider GVA benefit per worker across the LIA, where no such benefit will be felt.

Employment:

The ES understates the likely impact of employment loss arising from the loss of agricultural land and lacks transparency in its assessment of any jobs lost, or the nature of any jobs created.

- Limited interpretation of likely roles would suggest that any job creation locally will be in lower skilled, lower paid roles, and be unlikely to sustain livelihoods in the same way that jobs lost from agriculture.
- There is little or no community benefit through employment from the development, in an area that is in desperate need of jobs and prospects. The loss of farming livelihoods therefore can only be seen as an erosion of opportunity.
- The Applicant refers to the loss of 13 agricultural jobs is being detailed in ES Chapter 19: Soils and Agriculture (in 18.7.15 of ES Chapter 18). The author was not able to find any analysis of jobs / employment loss in this chapter, therefore the basis upon which the number of agricultural jobs lost has been calculated cannot be scrutinised.

Land Use:

The ES omits any consideration of efficiency of land use, nor does the ES consider the additional demands on agricultural land for planting trees, establishing peatlands and growing energy crops for biofuels, as identified by the UK Climate Change Committee in its 6th Carbon Budget. By omitting such important considerations, the sensitivity impacts of loss of land are understated.

Amenity:

The Applicant acknowledges the proportion of people within the LIA who regard themselves as having "bad" or "very bad" health is already above the national average. By adversely affecting local amenity, the scheme would therefore exacerbate the existing health and wellbeing issues faced by the region.

The Consent Order should ensure that the potential for properties and communities to be affected by blight are properly considered and potential remedies are available.

Local Plans:

A significant amount of work has been carried out in the region to develop plans for the future of the region. This work has been extremely conscious of climate change and actions to decarbonise the economy, however neither makes any proposals for the development of large-scale ground mounted solar as a contribution to the development of the region.

- The industrialisation of an area of Lincolnshire through extensive deployment of large-scale ground mounted solar would serve to undermine the Agrifood ambitions of the Lincolnshire Industrial Strategy as well as the appeal for visitors and the ambition to improve areas of deprivation through the stimulation of the Visitor Economy.
- The Central Lincolnshire Plan sets out objectives for Land Use (protecting the resources of the county) as well as for Climate Change and Energy. Where solar does feature, it is primarily in relation to retrofit to buildings or incorporation into building design.
- The CLP sets out policies for Renewable Energy as well as the protection of landscapes. The criteria to be met for a renewable scheme to be acceptable are clear, including considerations of scale, impacts on landscape character, visual amenity amongst other issues. What is also clear is that meeting these criteria would be impossible for a scheme at the scale of WBSP.

Overall

Within the ES, having followed its own carefully crafted methodology, the Applicant concludes that the scheme will have only minor adverse or beneficial effects, and completely fails to appreciate the significant impact development at this scale, primarily by using a Local Impact Area that is extremely broad, when many of the impacts will fall on a concentrated area within West Lindsey. When considering the "in combination" impacts of other NSIP scale solar developments within the same immediate area, conclusions are drawn in a similar way.

The ES generally concludes that impacts across the Local Impact Area for population health & wellbeing, disability & long-term health conditions, economic activity and employment are adverse. The assessment fails to consider that these negative impacts will be most severely felt in the concentrated area around the WBSP and other NSIP-scale developments.

It is clear that the ES fails to take a sufficiently holistic view in almost every respect, and it would seem to be fundamentally incredulous for development at this scale, or for multiple schemes within the same area, to have minor or negligible consequential impacts.

WBSP is inconsistent with local plans and ambitions for the future development of the region.

1 Methodology – Study Area and Geographical Range Considered

Chapter 18 of The West Burton Solar Project Environmental Statement (CPES18) considers Socio-Economics and Land Use. The document describes the methodology by which assessments will be carried out, and how various dimensions will be evaluated using a qualitative methodology.

The methodology defines the Local Impact Area (LIA) for the purposes of establishing baseline conditions as being West Lindsey and Bassetlaw and the wider Regional Impact Area (RIA) as being the East Midlands. These areas are used to consider elements such as population, deprivation, employment and economic activity.

In selecting such a broad area, the Applicant was able to conclude that, in most respects, the study area is broadly similar to the East Midlands and, or England as a whole, such as in relation to education, economic activity, unemployment.

This approach brushes over the very specific circumstances of the local area, in particular the socio-economic difficulties of the nearest town, Gainsborough, less than 8m from the nearest proposed section of WBSP. Gainsborough is, by one of the largest population centres closest to much of the distributed area of the proposed development, and is not considered in the Environmental Statement, therefore the Study Area for the assessment is insufficient.

The rationale given by the Applicant for having selected this area is that the scheme is situated across both the West Lindsey district and Bassetlaw district. In practice, the impact on the Bassetlaw district will be minor, being on the margins of the scheme, impacted for short periods for access to cable corridors. By contrast, West Lindsey district will receive the full extent of ground mounted installations of solar panels, switchgear and batteries.

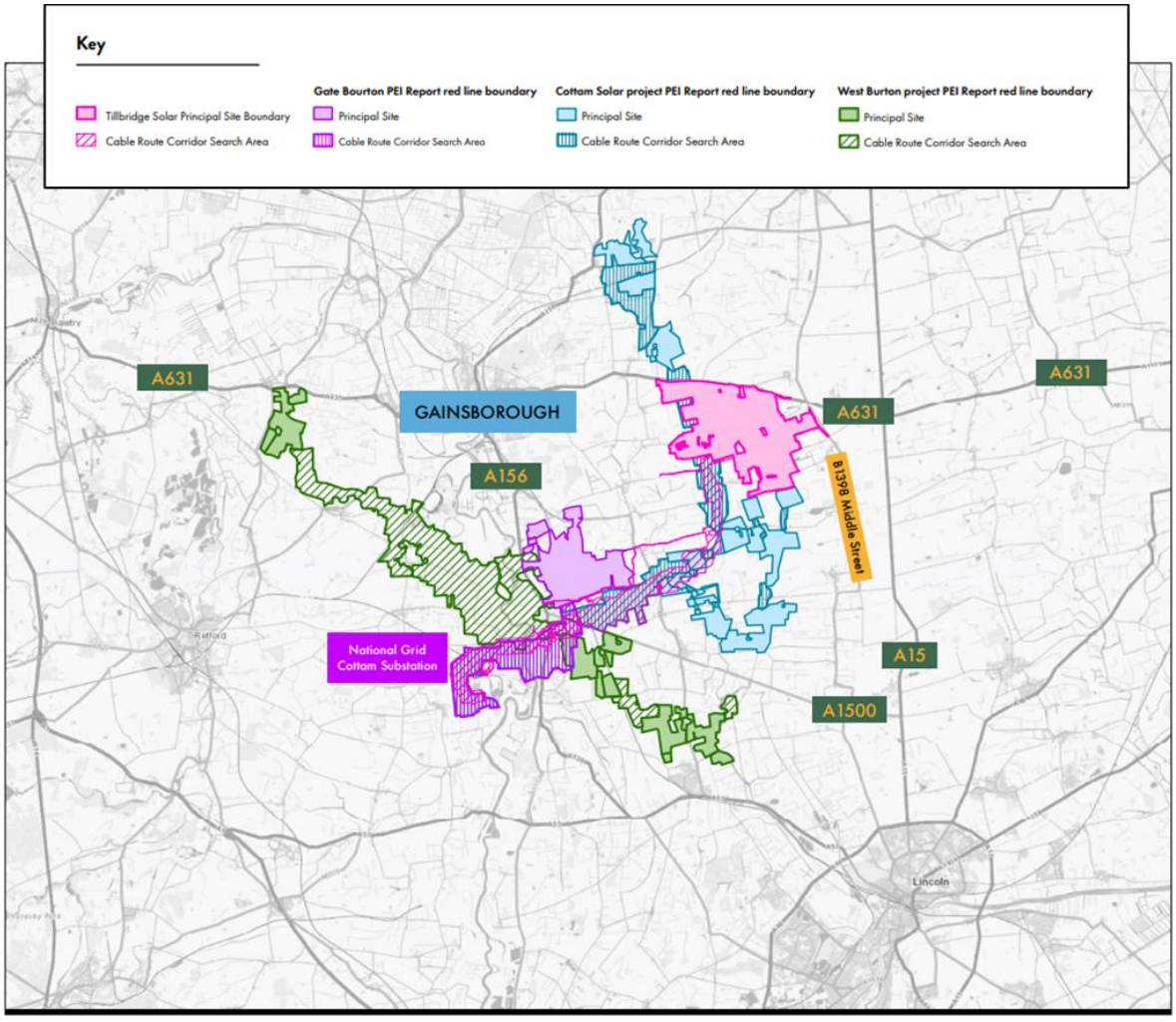
Within the ES, the Applicant describes the fact that 56% of the Local Impact Area population is within Bassetlaw, the district which is least impacted by the proposed scheme.

Selection of such a broad area as West Linsdey and Bassetlaw as scope for the Study Area, results in a failure to assess the impact on the areas closest to the development. The document is silent on any impacts on residential properties, despite a number being in extremely close proximity to the proposed scheme. This is effected through the design of the sensitivity methodology, which is set to consider standard deviations difference from the national population. By drawing the LIA and RIA as such broad areas, there is little likelihood that such differences would be identified. These sensitivity criteria have then been applied to very specific local amenities and dimensions, changes to which will be felt overwhelmingly by the small populations in the immediate area of the scheme. The size of this population is very small, in comparison to the whole LIA, therefore the assessment of impact on the communities in the immediate area is considerably understated.

The Applicant refers to facilities and features of neighbouring villages, including Blyton, Ingham, Fillingham and Sturton by Stow. The Applicant also refers to Neighbourhood Plans of villages through which the Order limits pass, including Saxilby with Ingleby and Sturton by Stow and Stow. Despite the very localised effects of the scheme on these villages and communities, the Applicant has not carried out any detailed assessment on the socio-economic impacts on these villages, many of which fall within 1-2km of the Order limits, and are dwarfed in comparison to the size of the adjacent developments. By contrast, the LIA considered in the assessment is over 55km across.

The Applicant states that “where applicable and practicable, additional fine-grain data at individual District level, or at District Ward level will be provided to determine the sensitivity”. No attempt appears to have been made to make use of publicly available information, or to carry out additional research to understand the implications or consequences of development at the scale of WBSP on the communities that will be most affected.

The Applicant attempts to use the same methodology to consider the combined effects of the 4 similar scale NSIP solar developments within the same region, again using the broad LIA as the reference area, and failing to consider the concentrated, combined effects of the 4 developments falling within a concentrated area. It is inconceivable that impacts on agriculture, tourism and public rights of way would be “not substantively different” from having 4 developments in close proximity, rather than 1.



2 Deprivation

Considering GVA per head, the Applicant uses the wider Regional Impact Area (RIA) to conclude that GVA is nearer the median GVA per population. The Applicant notes that the GVA for West Lindsey is £14,971, much lower than that for Bassetlaw at £18,448, the Regional Impact Area of £21,464 and the Great Britain figure of £27,097. Therefore, there is a materially lower GVA in West Lindsey, the area which will be most impacted by the proposed scheme, than any other area referenced.

Regarding deprivation, the Applicant refers to the 2019 Indices of Multiple Deprivation (IMD), and the Local Authority District areas, West Lindsey and Bassetlaw being 146th and 108th most deprived areas in England, respectively, of 317 districts. The Applicant notes that "populations within both districts in the Local Impact Area are more likely to be deprived (than the national average) of access to employment", and a "notable shortfall in population in their 20s and 30s within the Local Impact Area". Despite these observations, the Applicant draws no conclusion, and makes no reference to the impact the proposed scheme may have on these aspects of the socio-economic situation.

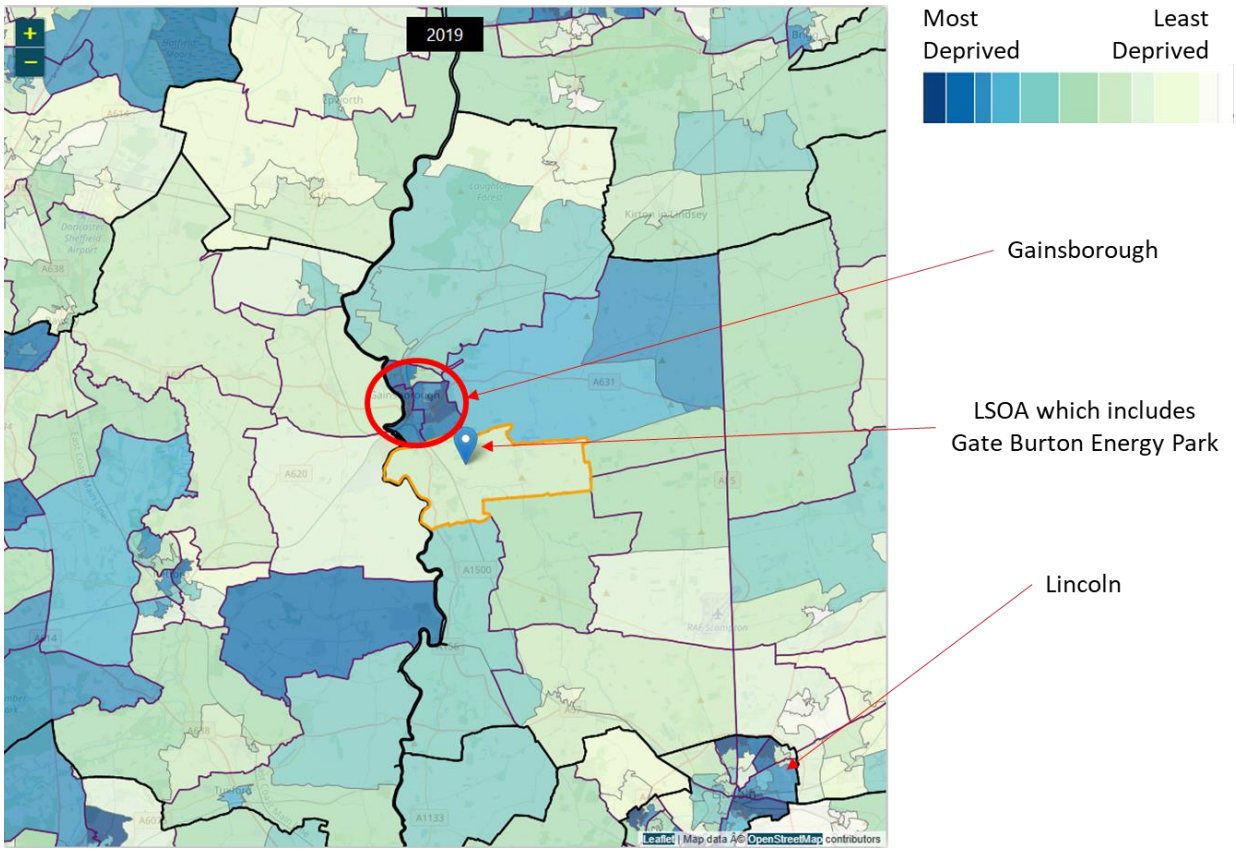
Similarly, the Applicant describes the results of the 2021 Census as showing that, within the LIA, the proportion of people with "bad" or "very bad" health is higher than the wider regional and national rate. Again, the Applicant draws no conclusion, and makes no reference to the impact the proposed scheme may have on these aspects.

The Applicant has not considered available socio-economic data at the next level of resolution, the Lower Layer Super Output Areas (LSOA's). Each LSOA has an average population of around 1500, so the cluster of 10 LOSA's in Gainsborough represent the largest population in the area. 4 LSOA areas within Gainsborough are within the top 10% most deprived areas in England. One of these areas is ranked 24th most deprived areas of the 32,844 LSOA's in England. In addition, although 4 are within the 10% most deprived areas, two more of the 10 Gainsborough LOSA's are only just outside this, within the 11th percentile. The Lincolnshire Industrial Strategy states that Gainsborough has low levels of employment (lowest 4% in England) and living standards (lowest 2% in England).

The main population area in the immediate vicinity of WBSP faces serious deprivation challenges, as evidenced by its standing in the IMD rankings, and its general trend towards worsening deprivation from 2015 to 2019. (See table below, with data from The English Indices of Deprivation 2019 (IoD2019), Ministry of Housing, Communities and Local Government).

Index of Multiple Deprivation (IMD), for Gainsborough area, from IoD 2019.					
Gainsborough LSOA's	Rank 2015	Rank 2019	Percentile most deprived	Deprivation since 2015	Population
West Lindsey 004E	149	24	0.07%	Worsened	1402
West Lindsey 004F	2157	1333	4.06%	Worsened	2039
West Lindsey 006A	2186	1547	4.71%	Worsened	1678
West Lindsey 006B	3507	2690	8.19%	Worsened	1976
West Lindsey 004A	4420	3312	10.08%	Worsened	1815
West Lindsey 006C	2936	3554	10.82%	Improved	1918
West Lindsey 004D	5438	4603	14.01%	Worsened	1858
West Lindsey 004C	8275	5248	15.98%	Worsened	1696
West Lindsey 004B	10507	5030	15.31%	Worsened	1921
West Lindsey 006D	10264	8901	27.10%	Worsened	2251

The IMD (annotated screenshot below) covers several dimensions of deprivation, including Income, Employment, Education Skills & Training, Health & Disability, Crime, Housing, Living Environment, Income affecting children, Income affecting older people. Of these dimensions, the only dimension that is “favourable” to Gainsborough measures the financial accessibility of housing – which is largely because in all other respects the indicators rank Gainsborough as being significantly deprived.



It is clear, therefore that one of the closest towns immediately associated with, and most directly impacted by parcels of the WBSP development is significantly deprived in terms of income, employment, and education, a situation which the ES neglects entirely.

The Applicant considers the overall changes to economic GVA in table 18.19, concluding that the LIA will see a net positive change in GVA arising from the development. The volume of positive GVA is entirely attributable to Ground Rent Uplift, which will be received by a very small number of land-owners, so the assertion that there will be a wider benefit for the LIA is misleading. Equating this to a £27 per worker in the LIA per annum across the lifetime of the project to assert a “minor beneficial effect” is simply spurious.

To carry out any sort of socio-economic review of the area around the WBSP and not acknowledge or address the deprivation issues of the main population centre is either misleading, partial, or superficial, and should further serve to render the assessment inadequate.

3 Employment

The Applicant has used the broad area of Bassetlaw and West Lindsey as the LIA for considering employment. In conducting its assessment, the Applicant applies the methodology sourced from the Homes & Communities Agency Additionality Guide, using technical factors such as leakage, multipliers and displacement to calculate the net employment during the operation of the scheme.

The Applicant estimates that 13 jobs would be lost because of ceasing agricultural activities, citing a detailed explanation in Chapter 19: Soils and Agriculture. A detailed treatment of this appears to be missing. It is therefore not possible to assess the basis upon which the loss of agricultural jobs has been calculated. It is not clear whether, for instance, this includes any "indirect or induced employment", which has been included when considering employment created by the proposed scheme. There is no information on the types of role lost, any levels of variable work arising from the seasonal nature of farming, the skills the roles require or the financial contribution they may make.

Equally, there are no details about the nature of the new roles, particularly during the operational phase, other than the indication of "leakage", i.e. the extent to which employment benefits leak from outside the area being considered. The Applicant only considers the potential for employment in the LIA, assessing 8 of the 12 direct jobs will be from the Bassetlaw and West Lindsey area. There is no assessment of what benefit maybe felt more locally, e.g. Gainsborough and the villages that will be surrounded by the WBSP.

It is likely that there will be a spread of roles, ranging from security and grounds maintenance, through to technical specialist roles and financial roles overseeing the management and settlement of the scheme. It would be reasonable to assume that the rates of pay will start at the lower end, with security and grounds maintenance, and therefore these roles are most likely to be sourced locally – as it is less feasible for people on low pay to travel from the outer reaches of the LIA to access these jobs. There is insufficient detail within the ES to make an assessment, but such roles are unlikely to sustain families or provide rewarding jobs with potential for progression, growth, and development.

Roles that demand specialist engineering and financial skills may not need to be full time in the on the project and given the deprivation rates regarding skills and education in the region, these roles are therefore more likely to be those subject to "leakage".

By contrast, within the region, Farming is very much considered a way of life and a rewarding, although challenging, vocation, that has sustained families for generations. The ES does not consider the weighted impact of the type of jobs lost and gained by the creation of the development. The ES treats all roles the same and is deficient in this regard.

The ES concludes that potential impacts on employment are a net decrease of 2 roles across the LIA, describing this as a "minor adverse effect". It describes an increase of 5 roles across the Regional Impact Area as "effectively a neutral effect". However, the assessment has potentially failed to adequately assess the roles lost. In addition, given the leakage consideration, the scheme is far more likely to provide lower skilled, lower paid jobs more locally, than the higher skilled roles, and at the cost of losing rewarding jobs that provide a livelihood in farming. There is little or no community benefit through employment from the development, in an area that is in desperate need of jobs and prospects, furthermore, there is no guarantee these jobs will return at the end of decommissioning. The loss of farming livelihoods therefore can only be seen as an erosion of opportunity.

4 Local Amenity

Within the ES, that Applicant notes that *"the Scheme and its near surroundings host a number of Public Rights of Way, which form important local recreational walking and cycling routes between villages in the immediate vicinity",* and that these are *"important to the local population for personal health and wellbeing, and for local amenity".*

As has already been described above, the Applicant has already acknowledged the proportion of people within the LIA who regard themselves as having "bad" or "very bad" health is already above the national average. By adversely affecting local amenity, the scheme would therefore exacerbate the existing health and wellbeing issues faced by the region.

The ES goes on to state that the *"Scheme is predominantly set within agricultural land, which due to its existing use, is not in itself a key tourist attraction or destination. The land does however play an important role in providing a landscape context to recreational use of waterways and walking and cycling routes, as well as for key attractions wherein their location is a key selling point."* The ES acknowledges therefore, the character, features and public rights of way which are a point of attraction for the region.

The assessment of impacts considers Public Rights of Way, typically concluding the outcome to be "minor adverse". While the ES describes the importance of PROW's for amenity, in practice, it is frequently the minor roads that serve as the amenity for walking, cycling and horse-riding. The impact of 4.5m high panels in proximity to the use of minor roads in this regard does not appear to have been considered in the ES.

The ES also describes the difficulties the region has around low GVA, education and deprivation. Many small villages surrounded by the West Burton Solar Project have few opportunities for employment and very few amenities other than the open countryside landscape that it sits in. The scale of the WBSP would rob villages of this key attribute and erode the attractiveness of villages, driving some people away and serving to deter people from moving in, therefore reducing their capacity to sustain communities and populations.

This idea of adversely impacting the "key selling point" within the area immediately surrounding the scheme has not been considered at all in the ES. The loss of the "countryside feel" of the villages around the proposed development has clear potential to reduce the attractiveness of these locations, particular when the "in combination" effects of the 4 NSIP schemes within the immediate area are considered. In other major infrastructure projects, property prices have been shown to be adversely affected, for instance with the HS2 development. In such circumstances, the concept of "blight" is considered, which is described as the "actual or assumed depreciation in value of property which may be attributable to a proposed infrastructure scheme". The Consent Order should ensure that the potential for properties and communities to be affected by blight are properly considered and potential remedies are available.

5 Land Use

Within the existing NPS EN-1, Overarching National Policy Statement for Energy, solar is clearly not envisaged to be a form of large-scale generation. The chapters on Renewable Electricity Generation states that "Future large-scale renewable energy generation is likely to come from the following sources", and lists Onshore and Offshore Wind, Biomass, Energy From Waste, Wave and Tidal. Solar is not included in the list. In fact, solar is only mentioned once within NPS EN-1, to highlight the issue that certain renewable sources *"are intermittent and cannot be adjusted to meet demand".*

With regard to land use, the NPS EN-1 (5.10.8) requires that Applicants *"should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations".* It is clear that the Applicant has not considered the wider implications of uncontrolled, extensive land use for solar putting additional pressure on land use, which must meet other decarbonisation and sustainability demands, such as food security, direct decarbonisation measures or growing biofuels.

Within NPS EN-3, National Policy Statement for Renewable Energy Infrastructure, solar is not mentioned in 82 pages of guidance, whereas, onshore wind, offshore wind, biomass, waste combustion, wave and tidal are all covered.

Within the "emerging" NPS EN-3 (November 2023), covering renewable energy, solar is now included, although this describes "a typical 50MW solar farm", not development at the scale of WBSP. In addition, there is a clearly implied hierarchy in the list of land that should be used for ground-mounted solar. Section 3.10.14 states: *"applicants should, where possible, utilise previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land (avoiding the use of "Best and Most Versatile" agricultural land where possible)."*

The wording is clear therefore, in that agricultural land should be used after these other land classes have been explored, and only where use of agricultural land has been shown to be necessary. The Applicant has failed to identify any previously developed land, brownfield land, contaminated land or industrial land for any of its proposed development, and the Applicant has failed to make any case that using agricultural land at this scale is at all necessary.

Within the "emerging" NPS EN-1 (November 2023) also includes *"The functionality of an object - be it a building or other type of infrastructure - including fitness for purpose and sustainability, is equally important"* (4.6.1).

It is clear that the energy and decarbonisation contributions that solar can make are limited to the point where the benefits do not outweigh the harms arising from ground mounted solar installation at such a large scale.

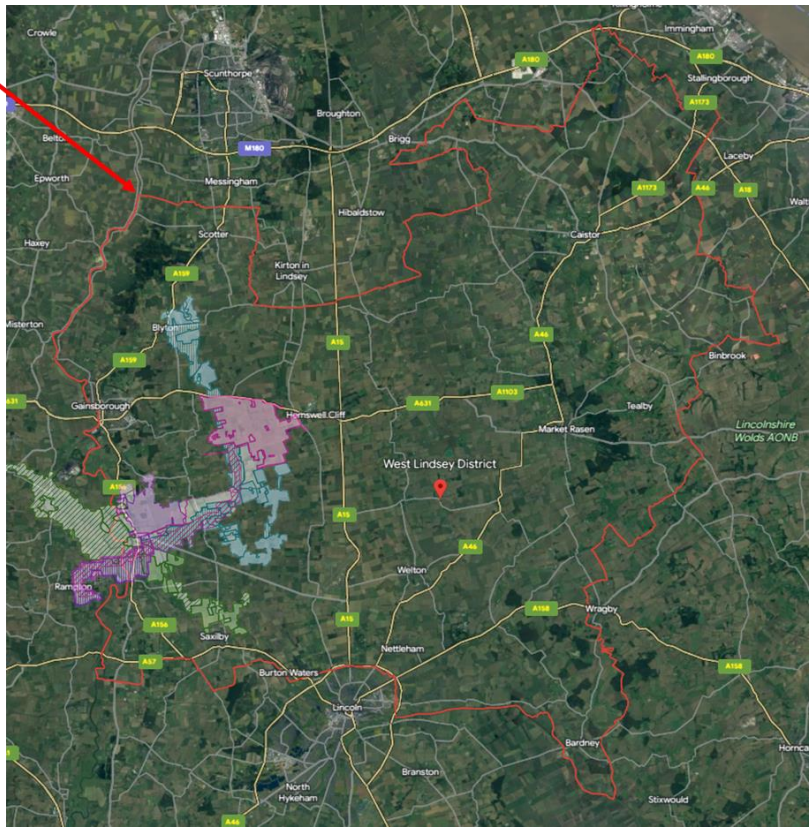
The land use assessment by the Applicant is entirely focused on the amount of agricultural land affected and Agricultural Land Classifications (ALC) of the land, making the argument that only a small proportion of agricultural employment will be impacted, on a temporary basis (although an operational life of 40 years can hardly be considered to be temporary), and only a small fraction of that will be considered Best and Most Versatile (BMV). An application to consume land on such a massive scale requires thorough assessment and broad consideration of land use alternatives. The evidence base produced by the Applicant is severely limited in this respect.

Overall, West Lisndsey has c. 106,474Ha of farmland. From a visual approximation, the southwest corner of West Lindsey, from Gainsborough to Hemswell Cliff to Lincoln is approximately 20% of the region. Assuming this as a proportion of farmland for West Linsdey overall, this area would have around 21,295Ha.

With 4 NSIP solar schemes in a concentrated area of West Lindsey, covering almost 4400Ha with solar panels, this cover around 20.6% of the farmland in this area – before any future solar developments are considered. This represents a significantly disproportionate effect on a small area of the county.

Map from Google Earth Showing West Lindsey District Boundary (red outline)

Gate Burton Energy Park, Cottam, West Burton and Tillbridge schemes superimposed on same scale



More significantly, the treatment by the ES omits any consideration of efficiency of land use, nor does the ES consider the additional demands on agricultural land for planting trees, establishing peatlands and growing energy crops for biofuels, as identified by the UK Climate Change Committee in its 6th Carbon Budget.

By omitting such important considerations, the sensitivity impacts of loss of land are understated. To therefore conclude that removing productive crop land at this scale would have "negligible or not significant" impact on agricultural land resource is, on its own, counter intuitive. The fact that additional land use pressures have not been factored in means that the assessment is oversimplified, leaving no room to consider the separate impacts of loss of 3b land in the face of these other significant land use challenges.

Apart from understating the local impact of the scheme, in these important regards, the ES regarding Land Use is deficient and inadequate.

6 Consideration of Local Plans

A significant amount of work has been carried out in the region to develop plans for the future of the region, notably the Central Lincolnshire Local Plan (CLLP) (April 2023) and the Local Industrial Strategy (LIS) (2021). Both documents are extremely conscious of climate change and actions to decarbonise the economy, however neither makes any proposals for the development of large-scale ground mounted solar as a contribution to the development of the region.

The LIS includes 6 main dimensions, Agrifood, Energy, Ports and Logistics, Defence, Health and Care, as well as Visitor Economy. Large scale ground mounted solar development has the potential to impact the Agrifood, Energy and Visitor dimensions in particular.

In terms of Agrifood, the ambition is to "become the UK's Food Valley and contribute to reducing the UK's reliance on food imports." The sector contributes 18% of Lincolnshire's GVA (in comparison with 3% nationally), therefore this is an important sector that the region can ill afford to neglect.

With regard to Energy, the focus of the region is on supporting the development of offshore wind as well as carbon capture and storage to support decarbonisation of gas infrastructure. Solar is considered briefly in terms of localised generation along with anaerobic digestion. Solar development at the scale of WBSP or any other NSIP scheme is not envisaged.

Regarding the Visitor Economy, the aspiration is to *"develop the tourism sector levelling up and supporting some of the more deprived parts of the region by providing higher-quality and more reliable employment for workers".* Within the ES, the Applicant acknowledges the contribution West Lindsey made to the visitor economy, acknowledging the area already has limited attractions, with the *"main attraction being focussed on heritage, aviation, environment and landscape"*. Considering this, the ES states *"The potential changes to landscape views, both temporarily from construction equipment and longer-term from the installation of the Scheme infrastructure, and the impacts from construction traffic impacting the desirability and accessibility of tourism and recreation routes and centres, both could negatively impact the prosperity of the local tourism economy."* It is clear that the large-scale development of ground mounted solar will only erode the attractiveness of environment and landscape.

Considering these three together, it would be logical to conclude that the industrialisation of an area of Lincolnshire through extensive deployment of large-scale ground mounted solar would serve to undermine the Agrifood ambitions of the LIS as well as the appeal for visitors and the ambition to improve areas of deprivation through the stimulation of the Visitor Economy.

The CLLP considers the growth and regeneration of the region over 20 years from 2023. Within the CLLP, there are a number of objectives, including for Land Use (protecting the resources of the county) as well as for Climate Change and Energy. During the evolution period of the plan, developers have been working on their proposals and consulting on large-scale ground mounted solar projects. It is notable that such projects do not feature explicitly within the plan. Where solar does feature, it is primarily in relation to retrofit to buildings or incorporation into building design.

Within Policy S14 Renewable Energy, the Council sets out the criteria to be met for a renewable scheme to be acceptable, including considerations of scale, impacts on landscape character, visual amenity amongst other issues. It is clear that meeting these criteria would be impossible for a scheme at the scale of WBSP, and while the Policy declares a presumption in favour of ground-based

photovoltaics, given this policy governs local planning decisions, it would be used to determine schemes up to 50MW, i.e. a fraction of the size proposed by WBSP.

Local Plans have identified locally designated Areas of Great Landscape Value (AGLV) which are considered to be of high landscape value to the local areas with strong distinctive characteristics which make them particularly sensitive to development. Known locally as the “Cliff Road”, the B1398 runs north from Lincoln, providing stunning views west across the Trent plain. This is included as an AGLV. Similarly, the A1500, Tillbridge Lane, from the junction with the B1398 provides tremendous views over the plain. It is clear that these views would be significantly altered by the placement of extensive ground-mounted solar developments, such as WBSP.

Policy S62 covers Area of Outstanding Natural Beauty and Areas of Great Landscape Value, stating that “A high level of protection will be afforded to AGLV reflecting their locally important high scenic quality, special landscape features and sensitivity.” Development is therefore required to “conserve and enhance the qualities and distinctiveness of locally important landscapes”, amongst other requirements covering wildlife, character and landscape quality and minimising adverse visual impacts. It is clear that wholesale development of large-scale ground mounted solar can not meet these clear requirements.

It is clear, therefore that WBSP is inconsistent with local plans and ambitions for the future development of the region.

References:

West Burton Solar Project, Environmental Statement, Chapter 18

EN010132-000369-WB6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation.pdf (planninginspectorate.gov.uk)

West Burton Solar Project, Environmental Statement, Chapter 19

Microsoft Word - WB6.2.19 ES Chapter 19_Soils and Agriculture (planninginspectorate.gov.uk)

Tillbridge Solar Consultation Leaflet 2023:

Tillbridge Solar Consultation Leaflet.pdf

The English Indices of Deprivation 2019 (IoD2019), Ministry of Housing, Communities and Local Government)

Indices of Deprivation 2015 and 2019 (communities.gov.uk)

Exploring local income deprivation (ons.gov.uk)

Homes and Communities Agency, Additionality Guide 2014

HCA Policy Covers (publishing.service.gov.uk)

Agricultural Facts: East Midlands Region (DEFRA), May 2023

Agricultural facts: East Midland Region - GOV.UK (www.gov.uk)

UK Climate Change Committee, 6th Carbon Budget.

Sixth Carbon Budget - Climate Change Committee (theccc.org.uk)

Central Lincolnshire Local Plan (CLLP) (April 2023), Central Lincolnshire Joint Strategic Planning Committee

Local Plan for adoption Approved by Committee.pdf (n-kesteven.gov.uk)

Local Industrial Strategy (LIS) (2021), Greater Lincolnshire Local Enterprise Partnership

GLLEP_Local_Industrial_Strategy_(2021).pdf (greaterlincolnshirelep.co.uk)

National Policy Statements for energy infrastructure

Department of Energy and Climate Change,

Overarching National Policy Statement for Energy (EN-1)

National Policy Statement for Renewable Energy Infrastructure (EN-3)

Currently Live documents (2011)
1938-overarching-nps-for-energy-en1.pdf (publishing.service.gov.uk)

1940-nps-renewable-energy-en3.pdf (publishing.service.gov.uk)

Draft Policies September 2021
EN-1 Overarching National Policy Statement for Energy (publishing.service.gov.uk)

Draft National Policy Statement for Renewable Energy Infrastructure (EN-3) (publishing.service.gov.uk)

Draft Policies March 2023
EN-1 Overarching National Policy Statement for Energy (publishing.service.gov.uk)

NPS EN-3 - Renewable energy infrastructure (publishing.service.gov.uk)

Department for Energy Security and Net Zero

Overarching National Policy Statement for Energy (EN-1)

National Policy Statement for Renewable Energy Infrastructure (EN-3)

“Emerging” NPS, November 2023, to come into force “early 2024”

EN-1 Overarching National Policy Statement for Energy (publishing.service.gov.uk)

National Policy Statement for Renewable Energy Infrastructure (EN-3) (publishing.service.gov.uk)