



West Burton Solar Project

Summary of Written Representation

EN-010132

West Lindsey District Council – 20038501

1. Introduction

- 1.1. This document summarises West Lindsey District Council's (WLDC) Written Representation (WR) regarding the West Burton Solar Project application.
- 1.2. WLDC has submitted a Local Impact Report (LIR) to the Examining Authority (ExA) to set out its view on the local impacts of the West Burton Solar Project. The purpose of the LIR is to set out WLDC's view on the local impacts of the project.
- 1.3. The WR is therefore to be read alongside the LIR as a document that goes beyond solely identifying impacts and serves as an assessment of the merits of the application against policy as required by the Planning Act 2008 (PA2008).
- 1.4. **Section 2** of the WR sets out the local context for West Lindsey and Central Lincolnshire and covers the following topics:
 - Landscape character;
 - Socio-Economic;
 - Environment;
 - Site description and surroundings; and
 - The key challenges facing the area.
- 1.5. **Section 3** of the WR sets out the West Burton Solar Project in line with applicant's description.
- 1.6. In **Section 4** WLDC highlight that the application was accepted for examination before designation of the 2023 amendments to the National Policy Statements (NPSs) for energy infrastructure. Therefore, the 2011 editions of the NPSs will be used to determine the application. WLDC consider the November 2023 versions of the NPSs to be important and relevant matters that will be given significant weight.
- 1.7. Local and national planning policies, including the Central Lincolnshire Local Plan (CLLP), neighbourhood plans, NPSs, The National Planning Policy Framework (NPPF), and energy-related strategies were summarised.

2. Key issues

Approach to the consideration of the West Burton Solar Project

- 2.1. The application has been described by the applicant in terms of three separate sections, but the sites must be considered as a whole in the decision making process.

Approach to site selection and alternatives

- 2.2. WLDC considers that applicant's approach to site identification has been wholly inadequate, and the benefits of the project could be achieved by having a site that demonstrates the level of design required to accord with important and relevant policy.

Overarching Impact on Communities

- 2.3. The proposed development will have a significant impact on communities in West Lindsey, both individually and cumulatively with other projects, which should be given significant adverse weight in the decision making process. The project will have a negative impact on daily life, during construction and operation, and will affect a wide area within the district. The project will also require replacement of solar PV panels throughout the scheme's design life, which is likely to cause further disruption to local residents during operation.

Community Culture and Wellbeing

- 2.4. The West Burton Solar Project will have a negative impact on the culture, character and way in which local communities engage with, and live within, the district. The project will replace the agricultural landscape with large-scale solar arrays, which will significantly change the character of the area and negatively impact the connection communities have with it, for over half a century.
- 2.5. The project will also have a negative impact on the well-being of local residents and people using the district for leisure purposes – particularly pedestrians and those engaging in active travel. The proliferation of construction traffic for 5 years or more will discourage the use of rural highways for recreation.
- 2.6. WLDC also maintains concerns over the safety risk of fire resulting from BESS infrastructure.

Construction Activities

- 2.7. The West Burton Solar Project will have a significant negative impact on local communities during construction and operation. The increase in traffic, noise, and air pollution will degrade the quality of life for residents and make it less attractive to use the area for recreation. The influx of construction workers will place pressure on local services and accommodation, and could dissuade visitors, with impacts to local services. The long construction period (both individually and cumulatively) could also impact the desirability to live in the area, resulting in concerns regarding the value of properties and businesses.
- 2.8. In summary, the West Burton Solar Project will have a negative impact on the day-to-day lives of local residents, the environment, and the local economy.

Main Site

- 2.9. The methodology used to identify the site and subsequent layout for the West Burton Solar Project results in an irregular and inchoate site with significant adverse impacts being experienced across the district of West Lindsey.

Cultural Heritage

- 2.10. It is highlighted that there will be unacceptable substantial harm to the bishop's palace and deer park Scheduled Monument. The proposal would also have a significant impact on other designated heritage assets, including Grade I listed buildings. These impacts are not minor and would have a long-term negative impact on the heritage of Central Lincolnshire. The project would also not comply with national and local policy, as it would not protect or conserve the historic environment of the area.
- 2.11. WLDC believes that the harm caused to the heritage environment outweighs the benefits of the project.

Landscape and visual impact

- 2.12. WLDC have significant concerns and objections to the Scheme due to its significant negative impact on the landscape character of the area. The project would introduce industrial elements that would detract from the open agricultural landscape and would have a long-term adverse effect on the landscape character of West Lindsey. The applicant's reliance on landscape planting to mitigate the visual impact is inadequate and would not be sufficient to screen the entirety of the development. The project would not comply with Policy S53 of the Central Lincolnshire Local Plan, as it does not make effective and efficient use of land and would not contribute positively to the sense of place. WLDC therefore recommends that the project should be refused.

Transport and access

- 2.13. The Scheme will have a significant impact on local roads, particularly during the construction phase, due to the multiple site accesses being created. This will cause disruption and safety concerns for local communities and businesses. The traffic survey data used to assess the impact is out of date and does not take into account the current volume of traffic. It is also unclear whether the environmental impacts of any temporary highway works have been considered. The applicant should provide more information on these matters, explain why it is not possible to schedule deliveries for peak hours, and justify why so many access points are required.

Tourism

- 2.14. The West Burton Solar Project will have a significant negative impact on the local tourism sector, causing damage to its image and recovery from Covid. The construction phase will result in disruption and a degradation to the environmental attributes of the West Lindsey District which will materially reduce its attractiveness and accessibility as a destination for visitors. There may also be cumulative pressure on accommodation availability. The operational phase will also have a long-term impact on the landscape character of some tourism and recreation receptors that are reliant on the landscape context for their value. The Scheme will result in the loss of approximately 13 agricultural sector jobs in the Local Impact Area.

Impact on best and most versatile land / agriculture

- 2.15. The ES assessment is limited to considering soil functions and does not provide an assessment of the impact on agricultural holdings. This is a significant concern, as it is unclear if, as a consequence of the Scheme, tenants will be displaced. WLDC also raises concerns about the cumulative assessment, which is based upon an absence of site specific assessments which are required to determine Agricultural Land Classification. WLDC believes that the data for the other schemes is now available to allow an adequate assessment to be carried out.

Ecology

- 2.16. The West Burton Solar Project's ES is adequate in scope and methodology, but WLDC has concerns about combustion emissions, decommissioning of West Burton A, grassland impacts, habitat pathways, other solar schemes, and the Shared Cable Route Corridor. The applicant should provide further information and clarification to address these concerns and other concerns raised in the WR.

Cable Corridor

- 2.17. WLDC is concerned about the significant impacts of the West Burton Solar Project's cable corridor during construction and the lack of detail on how the project will be delivered in the shared grid corridor.

Traffic and highways

- 2.18. Overall, WLDC is concerned that the cumulative construction traffic impact of the proposed project and other projects in the area will have a significant negative impact on local communities and the environment. WLDC call for the developer to provide more information and mitigation measures to address these concerns and enable an adequate cumulative assessment to be made.

Noise and vibration

- 2.19. WLDC considers that it is important to control vehicle movements and construction activity to ensure that the potential cumulative impacts are adequately controlled over what could be a significant time period. Including a co-ordination mechanism on control documents

(e.g. CEMP/CTMP) will assist in controlling these impacts and allowing communities to carry-out day to day activities with knowledge of traffic controls, AIL movements and working pattern on sites.

Ecology

- 2.20. The Applicant has based the Shared Cable Route Corridor on a construction programme taking 18 months in the Ecology and Biodiversity chapter. This differs from the Gate Burton scheme which accounts for a 24-36 month construction period. This would also circumvent the BNG guidelines which stipulate that 'temporary loss' of habitat is only when this cannot be restored (in full) to baseline condition within 2 years. If the cable route were to take longer than this then it is expected that the BNG calculations should be revisited.

Cumulative Impacts

- 2.21. West Lindsey District Council (WLDC) has significant concerns about the cumulative impacts of all three currently submitted Development Consent Orders (DCOs) for solar farms in the area. The council objects to the project on the grounds of its negative impact on the landscape character of West Lindsey, the agricultural industry, and the tourism industry. WLDC also maintains that the cumulative impacts of all three projects could be unacceptable and should be adequately assessed during the examination. The council recommends that a cumulative assessment be carried out that addresses the various combinations of the four proposed schemes West Burton, Cottam, Gate Burton and Tillbridge.

The draft Development Consent Order

Article 46 – Schedule 17

- 2.22. The applicant's latest version of the Development Consents Order sets out the procedure applicable to the discharge of details submitted pursuant to 'requirements' within Schedule 17 (Article 46). The council objects to the inclusion of a deemed consent provision and requests that the following timescales be specified:
- If there is no deemed consent provision, the timescale for Requirement 5 is 13 weeks and for other Requirements, it is 10 weeks.
 - If a deemed consent provision is retained, the timescale for Requirement 5 is 16 weeks and for other Requirements, it is 13 weeks.

Planning balance

- 2.23. WLDC objects to the West Burton Solar Project. The project's poor design leads to numerous infrastructure components and cumulative impacts on the landscape, communities, and economy.
- 2.24. The proposal fails to adequately address cumulative impacts with other projects and causes unacceptable harm to a Scheduled Monument. WLDC believes that the disbenefits outweigh the benefits and recommends the project's rejection.

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