

7000 Acres Written Representation

Deadline 2, 14th November 2024

Landscape Review

Executive Summary

The Tillbridge 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 of Local Impact Reports is raised within the Planning Act 2008 along with other important and relevant policies.

Barriers to Understanding. The contrast between the level of various types of information provided by the Applicants does not aid understanding for Interested Parties.

Landscape and Visual Effects. Negative impacts of the Tillbridge Solar Project (TSP) on Landscape Character and Visual Amenity are highlighted. The Applicant states that the TSP will have significant effect on landscape character areas. These findings confirm Interested Parties views.

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 at this scale is discussed in relation to biodiversity and the feasibility of the Applicants claims assessed.

Soils. The use of BMV land is discussed along with the damage to soils during construction. Yields of crops are considered paramount to ALC grading.

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 Applicant states that no significant health effects are predicted.

Tranquillity. Peace and quiet is experienced by residents around the site. The TSP will destroy this peace.

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1. Introduction

- 1.1 The 7000 Acres Group is a collection of residents and local community groups who object to the vast and concentrated solar industrialisation of the countryside in the District of West Lindsey, Lincolnshire. Many of our members are already being affected and will be further directly and adversely harmed by the Tillbridge Solar Project.
- 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 Tillbridge 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 by users and participants in this way.

The approach of this written representation is to provide the viewpoint of the people affected by the Tillbridge Solar Project (TSP) for the Examining Authority. The contents of this document highlight certain issues via reviewing the Application documents, drawing together the appraisal of the LVIA by Lincolnshire County Councils (LCC) Landscape Consultants, AHH along with the Local Impact Reports and Written Representations by LCC and West Lindsey District Council (WLDC). These elements combined with the ground observations of residents and Interested Parties informs this written representation. Further elements may be added in subsequent written representations as more information comes to light through the Examination process.

It is recommended that the video of landscape views around Glentworth and Harpswell taken from Middle Street (B1398), as submitted by 7000 acres for Deadline 2 of the Examination Process, be viewed in conjunction with this written representation.

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

Barriers to Understanding

Methodology and Findings of the LVIA

LVIA Methodology

Landscape and Visual Effects

Mitigation

Biodiversity and Biodiversity Net Gain

Soils

Mental Health & Wellbeing

Tranquillity

3. Size, Location and Duration of the Tillbridge Solar Project

3.1 The principal site of the scheme covers one area of approximately 3400 acres (1350 ha) of farmland and countryside with solar PV, battery storage energy system, high voltage cabling, substations, control centre and other associated infrastructure. The Order Limits include and amount to a 500MW Solar Project. The cable routes between the site and grid connection covers an area of approximately 750 acres (300 ha) and travels approximately 18.5 km and connects the scheme to the Cottam Substation at the site of decommissioned Cottam Power Station. The lifespan of the scheme is currently predicted to be for a 60-year period.

- 3.2 The Tillbridge Solar Project (TSP) is located approximately 5km east of Gainsborough and approximately 13km north of Lincoln. The main site is on land to the north and west of Glentworth and south of Harpswell Lane (A631) and to the east of Springthorpe. The proposed area for the TSP is a rural, open setting with large agricultural fields with some areas of hedgerow, woodland and small local villages.
- 3.3 The cable routes will travel approximately 18.5km from the main site to the grid connection and will cover an area of approximately 780 acres (315 ha). The proposal for this route travels across predominantly agricultural land. It will run parallel to Glentworth Road and then intersect several local roads, such as Common Lane, Cow Lane, Kexby Road and Fillingham Lane, then turn west and cross South Lane, Stone Pit Lane and Normanby Road (B1241). Further south it will also cross the East Midlands Railway Line and the Stow Park Road (A1500) and the Gainsborough Road (A156). Horizontal directional drilling will be carried out at key drilling sites and points where the cable proposes to cross the River Trent and then to connect to the Cottam Substation.
- 3.4 The area covered by the site 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. 'Lincolnshire is also home to around 25% of the UK's vegetable production, and 21% of ornamental crop production. This high level of production is vital to the county's economy, generating a Gross Value Added of £446m in 2012.' (Lincolnshire County Council, Review of ALC and Soil Resource Documents for the Tillbridge Solar Project, by Landscape, Land & Property).
- The cable route has not been assessed in terms of ALC Grades. It is also noted that parts of Tillbridge Solar Project are classed as BMV land.
- 3.5 Land drainage in this area is a key factor to sustaining agriculture practices and protection of residential areas. The introduction of the Tillbridge Solar Project will potentially increase flood risk, pollution from surface water run-off, increase water volume discharge and increase risks of inappropriate wastewater disposal.

7000 acres maintains that this aspect of the Applicants submission needs to be thoroughly tested and examined by independent experts during the Examination process.

- 3.6 There is one Public Right of Way (PRoW) located in the principal site. This is a bridleway which runs approx. 500m, south of Kexby Road, Glentworth. Also, there is a claimed PRoW which will connect the Harpswell PRoW, which travels through Hall Farm, and the Glentworth PRoW near Coachroad Hill. This runs along the base of the Lincoln Cliff.

Glentworth and Harpswell Parish Councils have worked for several years on formalising this PRoW between the two villages. It is deemed as a key link in the chain of local PRoW's and so the proposed TSP will threaten the likelihood of establishing this important local asset. Furthermore, PRoW's will be impacted in relation to the construction of the cable corridor.

It is important to note that 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, harms relating to freedom of access to local roads are a concern in terms of mental health and safety issues.

- 3.7 The design principles of the Tillbridge Solar Project and subsequent methodology utilised to develop the scheme is limited. Therefore, the site selection process has been established on land availability rather than by design. This has meant that assessment of site alternatives has not sufficiently been carried out. The proposed area of farmland and countryside to be covered by the Tillbridge Solar Project is extensive which in turn means the degree of potential harm is significant.

4. Planning Issues

- 4.1 It is considered that National Policy Statement (NPS) EN1 and EN3 provide policy for solar photovoltaic energy generation. Therefore section 104 applies.

The Local Impact Reports submitted by Lincolnshire County Council (LCC) and West Lindsey District Council (WLDC) are items the Secretary of State must have regard to.

Other Important and Relevant Matters include:

- 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.’

Furthermore, paragraph 180, NPPF, states that “Planning authorities and decisions should contribute to and enhance the natural and local environment by:

- a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).”

Also, ‘WLDC consider the paragraph 174(a) to be a relevant consideration to the examination of the Tillbridge Solar Project, particularly with regard to indirect impacts upon the designated Area of Great Landscape Value (AGLV) protected by policy S62 of the adopted development plan.’

- 4.3 The Central Lincolnshire Local Plan 2023 – 2043 was adopted April 2023 and replaced the Central Lincolnshire Local Plan (adopted in 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 104 of the PA 2008 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 considering the relevant Local Plan Policies and Neighbourhood Plans as cited by the respective Councils.

5. Barriers to Understanding

- 5.1 For Interested Parties, there are several barriers to understanding the information provided by the Tillbridge Solar Project. The detailed documents submitted to the Planning Inspectorate require professional understanding, analysis and scrutiny.

In effect, Interest Parties 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 navigate and source documents and interpret or understand the information submitted by the Applicant.

There is a strong need for improvement of material which conveys detailed information for Interested Parties. At present, IPs are initially offered advertising style leaflets produced by the Applicant and in contrast access to complex and extensive Application documents submitted to the Planning Inspectorate.

A halfway measure is required. The consultation process does not answer residents' questions. The Applicant must explain their findings in a fair, accessible, reasonable and informed manner to Interested Parties.

7000 acres recommends that the Applicant for the Tillbridge Solar Scheme, produces documentation tailored to Interested Parties which summarise the findings of the LVIA and other Application chapters and material. This will aid understanding for Interested Parties and as such will help to inform the Examination Process and subsequently the Secretary of State.

- 5.2 AHH Planning Consultants have been appointed by Lincolnshire County Council, to carry out a Landscape and Visual Review of the draft Development Consent Order for the Tillbridge Solar Project. These consultants also reviewed similar documents for the Gate Burton, Cottam Solar and West Burton Solar Projects and as such can provide valid cumulative landscape assessments of these four Schemes across the West Lindsey District.
- 5.3 The Landscape and Visual Impact Assessment (LVIA) is required to adopt a 'worst case scenario' approach regarding the proposed Development in line with the Rochdale Envelope. Whilst 7000 acres and Interested Parties understand the need for flexibility in design terms, it means that understanding of the Scheme and all the implications is prevented. We argue

that the flexibility to this degree gives the Applicant an unfair advantage over those who will be affected by the Scheme. To the extent that, informed judgements cannot be made.

We appreciate that the Examination process refines and explores the proposals, and that Interested Parties can be involved in this process, however, due to the scale of the TSP and complexities of the proposals, we are again disadvantaged in the Examination. Therefore, it is clear, that in terms of balancing needs, local needs are secondary to the Applicants in the NSIP Regime. The imbalance of weight which advantages the needs of Applicant as opposed to the needs of Interested Parties must be addressed in the NSIP Regime for any Scheme or Decision to have credence.

In terms of Landscape and Visual Impacts, the Applicants Draft Development Consent Order specifically cites the provision to remove *any* tree or shrub *within (as amended)* the authorised development. The LVIA claims retention and enhancement of trees and hedgerows within the same Order Limit. The subsequent findings of the LVIA are based on this premise. This contradiction within these two fundamental documents introduces ambiguity and allows each document and statements therein to undermine the other. 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. Any changes and implications need to be signposted clearly for Interested Parties.

This analysis of the LVIA and draft DCO by 7000 acres illustrates that material submitted by the Applicant can be contradictory and so cause confusion for those concerned.

6. Methodology and Findings of the LVIA

- 6.1 The extensive volume of information in the LVIA report and appendices creates a problem to convey the meaning and reasoning of the report for Interested Parties. 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 any trees and hedgerows as mentioned. Therefore, the basis of the LVIA is undermined as all landscape findings and recommendations refer to the retention of trees and hedgerows and vegetation

enhancement. No landscape plans show the potential of the Applicants statement in the Draft Development Consent Order to remove 'any' trees and hedgerows across the Scheme, i.e. the 'worst-case scenario'. The use of the word 'any' is vague and open. The mitigation programme is based solely on vegetation measures and so this programme through all phases of the proposed Scheme, will be compromised if this element of the draft DCO stands.

- 6.2 Lincolnshire County Council, Planning and Regulation Committee report, 4th November 2024, state at paragraph 38 'Vegetation removal identified within the draft DCO (articles 39., 40., and Schedule 12) should be clarified, and processes put in place to ensure any vegetation loss is agreed with the relevant parties prior to any works being carried out. This should clearly relate to hedgerow removal plans and Arboricultural Impact assessment (AIA), and this must also include vegetation removal or works to facilitate wider highways and access works, such as for abnormal loads.'

The 7000 Acres Group agrees with Lincolnshire County Council in this regard and strongly objects to the possibility of potentially any trees and hedgerows within the Order Limits and beyond being removed. Interested Parties have expressed shock and disbelief at this possibility. The Applicants documents are contradictory and intentions are unclear.

- 6.3 Both landscape effects and visual effects have been assessed in accordance with the Landscape Institute's Guidance for Landscape and Visual Impact Assessment, Third Edition (GLVIA3).

The study areas as shown in Figure 12-3 (EN010142/APP/6.3) depict the Principal Site as 5km area and the Cable Route Corridor as a 1km area.

It is not clear if the Applicant has produced plans showing the collective study areas and multiple zones of theoretical visibility for all four NSIP solar projects in the West Lindsey District. If this has not be provided by the Tillbridge Solar Project, 7000 acres requests that such a document is supplied for the Examination.

- 6.4 In addition to the previous concerns discussed, all visualisations in the LVIA show the retention of most trees and hedgerows during all phases of the Scheme. If the ‘worst-case’ option to remove any trees and hedgerows is employed, then these visualisations completely misrepresent the Applicant’s proposals and intentions to all parties involved.

Also, Lincolnshire County Council’s Landscape Consultant, AHH, state in their Landscape and Visual Review of the draft Development Consent Order for the Tillbridge Solar Project (3.8) that the visualisation methodology in capturing viewpoints within the Zone of Theoretical Visibility (ZTV) is ‘not explicit regarding what parameters the proposals have been modelled to...’ Therefore, in this respect 7000 acres are unaware if the ‘worst-case scenario’ approach expressed in the Rochdale Envelope has been applied. This creates ambiguity.

7. Landscape and Visual Effects

- 7.1 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 ‘a relatively expansive landscape, characterised by long views and dramatic skies’, (West Lindsey Landscape Character Assessment (1999)). This appraisal, although written some twenty-five 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.
- 7.2 The area has a strong north-south grain with the Jurassic limestones ridge known as the ‘Lincoln Cliff’ forming a landscape backbone which travels the length of Central Lincolnshire. It is a pivotal feature of the area. To the west, the land slopes down to the Till Vale and Trent Valley. The landscape is wide and open with expansive views of an agricultural landscape which allows people to have long, broad views and appreciate the beauty of the landscape in all its glory and provides a sense of longevity and history. Soils are fertile and productive.
- 7.3 There are two Areas of Great Landscape Value (AGLV) identified in the LVIA. These are the Lincoln Cliff (as described) and an area south of Gainsborough. These designated areas are

afforded greater protection in terms of policy protection as defined by West Lindsey District Council Local Plan policy S62. The LVIA recognises the local and regional landscape character of the Tillbridge Solar Project and its subsequent wider study area.

- 7.4 The LVIA's desk top study examines the National, Regional and Local Character Areas. In terms of potential impacts from the TSP on local landscape character areas (LCA), 13 LCA's (mainly from the West Lindsey Landscape Character Assessment) have been identified as landscape receptors.
- 7.5 Due to the scale of the Tillbridge Solar Project, the large amount of information in the LVIA prevents an understanding of the overall landscape character of the study area for Interested Parties. Again, barriers to information occur as the process of cross-referring the many tables and pages means a clear picture isn't presented.
- 7.6 The Tillbridge Solar Project Environmental Statement Appendix 12-5: LVIA Preliminary Assessment of Landscape Effects (EN010142/APP/6.2) claims there are only two landscape character receptors which are assessed as being of high sensitivity. These are the Lincoln Cliff – Harpswell (LLCA2B) and the Lincoln Cliff – Fillingham (LLCA 2E). With seven further Landscape Character Areas assessed as having a medium sensitivity. These are areas; LLCA 1A: Open Limestone Dip Slopes – Hemswell Cliff; LLCA 2A: Lincoln Cliff – Hemswell; LLCA 2C: Lincoln Cliff – Open Farmland; LLCA 2D: Lincoln Cliff – Glentworth; LLCA 3C: Till Vale Villages; LLCA 3a: Till Vale Open Farmland; and LLCA 5A: Trent Valley – Meadowlands.
- 7.7 In terms of landscape and visual effects, six of the Landscape Character Areas (LLCA's) are assessed as being significantly affected by the Tillbridge Solar Project at various stages of the scheme. LLCA 3A Till Vale – Open Farmland is assessed as being significantly affected (Moderate Adverse) throughout all stages of the scheme (including Year 15). At Year 15 the Applicants mitigation measures are designed to take effect. Therefore, this result illustrates that the Till Vale, which is the principal site to the Tillbridge Solar Project will arguably suffer significant effects for the lifetime of the project and that any mitigation will not reduce those harms and not be effective. In the Tillbridge Solar Project Environmental Statement Appendix 12-2: Methodology for Assessment of Landscape and Visual Effects, the Applicant also states that the Till Vale – Open Farmland will suffer due to; 'Alterations that result in a partial

deterioration of the existing landscape resource.’ Also, ‘Valued characteristic features would be largely lost.’

In terms of the visual effects from the TSP on the Till Vale – Open Farmland, the Applicant states that the visual effects will suffer with ‘Alterations that typically result in a noticeable deterioration in the existing view.’

7.8 7000 acres agrees with the Applicant that the landscape character will be ‘largely lost’ and views will and suffer ‘noticeable deterioration’ of the principal site of the Tillbridge Solar Project. In essence, mitigation will not be effective.

7.9 West Lindsey District Council’s Local Impact Report (6.26) states that, ‘it will not be possible to fully mitigate every adverse effect due to the requirements of the Scheme. As such, no additional mitigation is proposed.’

7.10 As the Applicant is aware that these harms to landscape will occur due to the implementation and operation of the Tillbridge Solar Project and can’t be mitigated, 7000 acres would like the Applicant to explain to all parties why they have submitted the application considering these findings?

7.11 In addition to the above the Landscape & Visual Review carried out by AHH Planning Consultants on behalf of Lincolnshire County Council, October 2024, (4.15) states that; ‘Access, and the wider highways elements of the scheme, do not appear to be fully considered in the LVIA beyond increased traffic during construction and decommissioning phases. This is despite the potential adverse effects on the rural landscape highways works may have, including potential vegetation loss, urbanisation and reduced visual amenity. Consequently, the landscape effects during construction may be underestimated within the LVIA through the impact of, or loss of, vegetation.’ They go on to say: ‘We strongly recommend limiting vegetation loss along site boundaries for access or sight lines, or along construction access routes, because this has the potential to change the character of the local landscape beyond the limits of the Principal Development.’

- 7.12 7000 acres and the members we represent in the district are acutely aware of the potential harm that construction traffic may have on existing vegetation and habitats and the material change to the character of the landscape if vegetation is to be removed. Clarity on this issue must be provided for Interested Parties. Members are also concerned regarding safety implications with potential damage being caused to trees and tree roots along roadsides.
- 7.13 In terms of visual effects, 29 viewpoints of the Principal Site and 9 viewpoints of Cable Route Corridor were identified by the Applicant. These effects were assessed at each stage of the scheme, namely, construction, operation (Year 1) and operation (Year 15). The Applicant assessed that there will be significant visual effects at each of the above stages but not at decommissioning of the scheme.

The 7000 acres group agrees that there will be significant visual effects at each of these stages of the scheme but questions the finding at decommissioning. The act of carrying out this decommissioning process, along with any resultant damage to the land and landscape across this vast Scheme will in our opinion have a significant effect on views.

In the Landscape & Visual Review by AHH (5.14) the Planning Consultants qualify the Applicants visual assessment as they state that, 'views and visual receptors with significant effects are typically those with close range views of the development, however views from the elevated land of the Lincoln Cliff also have significant effects due to the extent of solar development within the extensive and often panoramic view.' Furthermore, AHH argue that any reduction in visual effects as asserted by the Applicant is potentially due an 'over reliance upon mitigation planting to screen the proposals without full attention to the potential impact of this screening on the landscape.'

They conclude the LVIA (5.15) 'potentially underplays the Magnitude of visual effect' at three viewpoints across the scheme (viewpoints 2b, 4 & 20).

- 7.14 Figure 12 - 4 (EN010142/APP/6.3) shows viewpoint 4, Middle Street above Harpswell (B1398). The baseline (winter) view of this viewpoint is of the wide, open landscape of the Till Vale from the Lincoln Cliff. In contrast, the Proposed (summer) view at Year 15 will predominantly provide a view of hedgerows. Considering that people will be travelling

through this landscape by vehicle or bicycle and so at some speed, the current majestic view will not be visible to receptors. AHH (5.15) state that; 'The Development will result in large scale change to this view firstly with construction activity and then at operation with panels and structures. This will be experienced along several sections of the B1398, at a scale not present in the existing landscape, and we would judge the magnitude of visual effect at construction and operation year 1 will be high.' This assessment contrasts to the Applicants own of assessment of medium effects (EN010142/APP/6.2 Appendix 12 - 6, page 14). At the same point in this document, the Applicant goes on to say that 'the massing of panels, alongside the BESS and Solar Stations, will introduce a more industrial, functional character to the view, with the largely unvarying, grey panel colours contrasting with the baseline browns and greens of winter field patterns.'

This finding by the Applicant is agreed by 7000 acres. Interested parties and our members believe this viewpoint and landscape will be materially and significantly changed for the lifetime of the project and potentially beyond.

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.

- 7.15 People will travel through this drastically changed landscape continually seeing sequential changes in the views. This will lead to the perception that the whole land use and landscape has changed in character from agricultural to industrial. Travelling beyond the Tillbridge Solar Scheme passed the Cottam Solar Project, the West Burton Solar Project and the Gate Burton Project, this perception will be exacerbated. The understanding and experience of the landscape is no longer green fields and agriculture but millions of grey coloured panels and industrial equipment.
- 7.16 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.

- 7.17 The proposed Tillbridge Solar Project will directly and indirectly impinge on this programme of tree planting in the County. Moreover, the TSP is advocating removing 'any' trees and hedgerows as discussed. Therefore, the diverse habitat creation which will add to the current ecological and environmental make-up of the area, from this woodland creation programme, will in effect be detrimentally affected due to the proposed expanse of the solar industry across the landscape. 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 Tillbridge Solar Project and further proposed solar NSIP's in the District.
- 7.18 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 and visual amenity.

Lincolnshire County Council agrees in their Local Impact Report for the TSP (8.9) that:

'By reason of its mass and scale, the proposed development would lead to significant adverse effects upon landscape character and visual amenity. The development has the potential to transform the local landscape by altering the character on a large scale. This landscape change also has potential to affect wider landscape character, at a regional or county scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness, tranquillity and agricultural character, that are identified as defining characteristics of the area. The Council are particularly concerned about the landscape character effects through changes to the land use over a large area.'

Cumulative Landscape and Visual Effects

- 7.19 The Cottam Solar Project, Gate Burton Energy Park and West Burton Solar Farm are proposed alongside the Tillbridge Project both in proximity and time frames. A further NSIP Solar Project has been 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. The proposed landscape change to the region and locality is overwhelming for residents and interested parties.

- 7.20 The Applicant concludes there will be adverse cumulative effects alongside the Cottam Solar Project. This is highlighted by AHH (6.4) where the Till Vale Open Farmland (LLCA 3a) will be affected at all stages of the Scheme and the visual receptors along Middle Street (Viewpoints 7 & 13) Glentworth Cliff Farm and Public footpath at Hemswell (Hems/787/2) will also suffer these adverse cumulative effects.

Also, the development alongside the Glentworth oil well (ID 76) will increase the presence of energy infrastructure at Kexby Road, west of Glentworth (VP9).

7000 acres would like to draw to the attention of the Examining Authority that the Applicant states that the construction of the hydrocarbon wellsite, with the drilling of one vertical appraisal well and up to seven horizontal development wells and ancillary development has been completed. (Tillbridge Solar Project Environmental Statement Appendix 18-1: List of Cumulative Developments). (EN010142/APP/6.2)

To the best of our knowledge this is incorrect. The construction is not complete. IGas Energy Plc was granted planning permission on 08/02/24 by Lincolnshire County Council at Land to the west of Northlands Road, Glentworth.

In addition, the Applicant goes onto say that there will be adverse cumulative effects for all the solar DCOs in combination with the cable route corridors, where receptors are of a higher sensitivity and development elements will be in close proximity. However, they go onto state that this will only occur at the (temporary) construction phase.

- 7.21 West Lindsey District Council in their Written Representation (5.2) ‘considers the proposal unacceptable in planning terms due to the cumulative impacts with other projects on the landscape character and visual effects will be significant and adverse, causing material harm to the landscape character of West Lindsey and the interpretation of its distinct characteristics.’

Also, they state that (5.13) the ‘cumulative impacts of the Tillbridge Solar Project with the other consented solar NSIPs Gate Burton and Cottam, and the West Burton project (awaiting decision) is deemed wholly unacceptable in planning terms. The unprecedented circumstance of delivering potentially four NSIP large scale solar projects within the rural district of West Lindsey will have significant adverse impacts upon the rural landscape character of the Till Vale and The Cliff LCAs (The Cliff protected as an AGLV). The magnitude and rapid pace of this character change will adversely affect the interpretation, appreciation and culture of the landscape and communities in West Lindsey.’

- 7.22 Lincolnshire County Councils consultants, AHH, found (6.6) ‘that the cumulative change to the landscape will be considerable and the combination of two or more sites has the potential to change the local landscape character at a large scale. 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. As clarified within GLVIA3, changes to the landscape do not necessarily need to be seen to have an adverse effect.’
- 7.23 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 to the landscape, environment and ourselves is not really measurable. The Applicant applies measures, but the Examination Authority must be aware that the Applicants measures do not quantify the depth of hurt and harm felt by those who will suffer if these Schemes go ahead.
- 7.24 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. Several significant cumulative views have been identified in the LVIA, and these identified views do not have to be extensive and open to create the perception of a changed character over a wide area. Regular, sequential, glimpsed views will also create this effect and change the experience of the visual receptors as they pass through the area.’

- 7.25 7000 acres suggests that the Examination Authority for the Tillbridge Solar Project has a unique opportunity to thoroughly examine the cumulative impact of the four solar NSIP's in West Lindsey District as this scheme is the last of the four in the region to be examined.

Residential Visual Amenity

- 7.26 Considering the significant cumulative impacts of the NSIP solar schemes in the West Lindsey District along with other planning developments in the region plus the rapid pace of change at which these schemes are likely to occur, 7000 acres requests that a Residential Visual Amenity Assessment is carried out by the Applicant and is subsequently independently assessed.

There comes a point at which a tipping point is reached. The Landscape Institute define this as the Residential Visual Amenity Threshold (RVAT), LI Technical Guidance Note 2/19. Many interested parties feel we have reached this point where the scale of change is unsurmountable.

8. Mitigation

- 8.1 The Mitigation of the Tillbridge 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 potentially 'any' trees and hedgerows are to be removed as stated in the Draft DCO then mitigation measures are lacking robustness.
- 8.2 It is noted that the landscape screening for the Tillbridge Solar Project is the only mitigation utilised. The screening of the Scheme is subsequently solely dependent on the retaining and establishing vegetation.
- 8.3 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.

The implementation of landscape vegetation is the focus of mitigation for the Scheme. An overriding landscape characteristic of the area is the wide and open landform. 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.

- 8.4 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 compounds the loss of existing vegetation, due to removal for development and loss of the landscape area within the site boundary.
- 8.5 Extensive and persistent browsing of hedgerow and hedgerow trees is common knowledge in local communities. Establishment of planting in the landscape is haphazard.
- 8.6 The proposed solar panels will be 2.5m 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.
- 8.7 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.

- 8.8 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 maintenance operations for 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 maintenance operations 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 Landscape Management Plan.
- 8.9 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 potentially 'any' trees and hedgerows are removed in relation to the Tillbridge Solar Project as stated in the Draft DCO, the negative effects on the environment, regional and local landscape character will be significant.
- 8.10 Mitigation is solely based on landscape planting. Our members are aware of the difficulty of establishing landscaping in the area due to grazing and browsing. Therefore, we suggest that mitigation may potentially fail. In this event, findings of the LVIA are unsound.

9. Biodiversity and Biodiversity Net Gain

- 9.1 The Tillbridge 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 and biodiversity is a matter of grave concern to our members. These aspects of the local environment enrich how the landscape and biodiversity therein is experienced by users. The complex and interactive elements of the landscape form a unique, precious and balanced environment.
- 9.2 The TSP represents a monoculture of solar over land. The loss of land mass has an immediate negative impact on biodiversity.
- 9.3 Biodiversity is under pressure from competing land use factors.

9.4 The proposals in the Tillbridge Solar Project to remove existing and mature trees and hedgerows equate to immediate and extensive habitat loss. (See the Applicants Hedgerow Removal Plans, EN010142/APP/2.9 & Change Request, Revision 01).

In contrast to the specific areas of hedgerow removal as mapped in the above plans, the draft Development Consent Order states that; 'The undertaker may fell or lop any tree or shrub near any part of the authorised development (Article 39 (1)).

At the Issue Specific Hearing 1, the Applicant agreed to change the word 'near' to 'within'.

However, it is apparent that aside from the hedgerow removal plans, the Applicant, if granted, will be able to remove 'any' tree or shrub within the Order Limits (as amended).

This article provides no control of the Applicant or their agents in this regard and therefore, is not adequate or reasonable.

9.5 Removal of established vegetation means species loss and consequentially biodiversity loss as established landscape, trees and hedgerow already have a biodiversity value. For instance, bird species such as golden plover and skylark require open ground and habitats. The potential loss of these habitats for the Tillbridge Solar Project is evident if the scheme is granted.

9.6 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 loss.

9.7 Also, as previously discussed, the localised browsing of newly planted vegetation means landscape and biodiversity mitigation measures will be adversely affected. As such, claims by the Applicant that biodiversity will increase and net gains in biodiversity achieved are questionable. Without successful mitigation measures, biodiversity will be negatively impacted.

9.8 The construction of the TSP will cause fragmentation and destruction of existing habitats above and below ground. With the further three other NSIP solar schemes in the West

Lindsey District, the cumulative impact of construction on biodiversity has the potential to be significant. If works are carried out simultaneously, these impacts will be compounded.

- 9.9 The landscape has opportunities without the TSP to improve biodiversity. Current and evolving Government Policies and Programmes mean that funding for biodiversity improvement schemes is 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.
- 9.10 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.'
- 9.11 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'.
- 9.12 Research into the impact on bat activity as highlighted in the Journal of Applied Ecology; Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity (first published 07/08/23) was carried out in the southwest of the UK.

The article finds that 'for several species, there was lower activity in fields with solar PV panels, in both open and boundary habitats, compared to matched fields without solar PV panels. Specifically, solar PV sites had a significant, negative effect on six out of the eight bat species.' Also, 'hedgerows and connective features are important commuting and foraging features for bats.'

In addition, the authors stated, 'further research is required to assess bat behaviour at and in proximity to solar PV sites to understand why some bats avoid solar PV sites, for example whether prey sources are negatively affected by solar PV developments or potentially panels are creating a collision risk with bats attempting to drink from them (Greif & Siemers, [2010](#); Greif et al., [2017](#); Horváth et al., [2010](#); Russo et al., 2012).

The authors state that the 'study identifies some detrimental effects of solar PV sites for bat activity, and as such we conclude that assessing, mitigating and monitoring bat activity needs to be factored into solar PV development planning and operation.'

- 9.13 It is apparent that within the Framework Landscape and Ecological Management Plan (EN010142/APP/7.17) the Applicant states that 'there are likely to be roosts within or close to the Order limits of Common Pipistrelle and Soprano (Pipistrelle Pipistrellus pygmaeus), Noctule (Nyctalus 19aubent), Leisler's bat (Nyctalus leisleri), Myotis species (e.g. Daubenton's Myotis 19aubentoniid or Natterer's Myotis nattereri) and Brown Long-eared' (p19). However, West Lindsey District Council (Local Impact Report – Tillbridge Solar Project) argues that 'most surveys appear to cease at the site boundary whereas, in general surveys would be expected to extend beyond the site boundary to fully understand the ecological baseline within the site and its immediate surrounds.' (7.1.1)
- 9.14 7000 acres argues surveys for bat activity, foraging, habitats and roosts need to be carried out to include not only the Order Limits but also areas beyond these limits to enable understanding of any potential impacts and therefore be able to mitigate such impacts. Also, the Applicant did not assess roosts for bats inside the Order Limits. Therefore, considering the above evidenced research, we argue that the Applicant has not fully assessed the potential harms to bats and as such their findings are not conclusive.
- 9.15 A further article within the Journal of Applied Ecology, accepted 15/11/23, entitled *Renewable energies and biodiversity: 'Insectivorous bats alter their flight and feeding behaviour at ground-mounted solar farms'* is another example of recent evidenced research which needs to be taken into consideration when assessing the impacts of this Scheme on bat activity.

10. Soils

- 10.1 The soil types in the area are defined as:

Salop Association soils - this soil type is on the west side of the site. It is 'slowly permeable seasonally waterlogged reddish fine loamy over clayey, fine loamy and clayey soils associated with fine loamy over clayey soils with slowly permeable subsoils and slight seasonal waterlogging.'

Beccles 1 Associations soils - this soil type is to the north-west and east of the site. It is 'slowly permeable seasonally waterlogged fine loamy over clayey soils, associated with similar clayey soils.'

Ragdale Association soils - this is in a small area on the northern boundary and is a 'slowly permeable seasonally waterlogged clayey and fine loamy over clayey soils' with 'some slowly permeable calcareous clayey soils especially on slopes.'

Wigton Moor Association – this is in the far east of the site. They are 'permeable fine and coarse loamy soils variably affected by groundwater, the drier soils being on slightly raised sites. Generally flat land.'

(Lincolnshire County Council, Review of ALC and Soil Resource Documents for the Tillbridge Solar Project, by Landscape, Land & Property).

- 10.2 The ALC findings supplied by the Applicant are in line with MAFF 1988 Guidelines and Natural England Technical Information Note TIN049. The findings of the ALC report show 90% of the land is grade 3b, however, when the remainder 10% for this project is expressed alongside the percentage of BMV land for the other three NSIP solar projects in the West Lindsey District, the respective percentages reflect the proportion of BMV land to be developed upon within the concentrated area of the collective projects. The percentages are as follows:

The Tillbridge Solar Project will use 10% BMV; the West Burton Solar Project will use 22.8% of 3a, 1.3% of grade 2 and 2.3% of grade 1; the Cottam Solar Project will use 10% and the Gate Burton Project is expected to use 20 – 60% of BMV land.

It is arguable that if the four NSIP solar schemes in the West Lindsey District could have been examined or even appraised collectively by the Planning Inspectorate, the amount of BMV land being used for the schemes would have been clear and the degree to which non-compliance with current national and local policies evident. In our view, the Applicant has not justified the use of Best and Most Versatile land for the proposed development.

The 7000 acres objects to the use of BMV land for the Tillbridge Solar Project.

The 7000 Acres Group argues that a full and independent ALC needs to be carried out to identify the Grades and land quality in the TSP.

- 10.3 The land within the cable corridor is not estimated in the Applicant's ALC Report. It is anticipated that some land within the cable corridor will be BMV.

Members of the 7000 acres group farm and grow viable crops within the land allocated for the cable corridor. The crop yield is high. They have concerns regarding timing of the works, stripping and storing of soils, land drainage, damage to soil structure and biosecurity for plant diseases. All these issues and activities will have a detrimental affect on their ability to farm the land during and after the proposed works to the cable corridor.

- 10.4 Local knowledge of the area has highlighted (in minutes of 7000 acres group meetings) that during the abnormally hot and dry summer months of 2022, 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 in the area by the Applicant makes a special contribution to food security, environment, local economy and the nation at times when other regional crops fail. As cited in LCC's soil report (Review of ALC and Soil Resource Documents for the Tillbridge Solar Project, by Landscape, Land & Property, Section 5) the United Kingdom Food Security Report notes that; 'wheat yields dropped by 40% in 2020 due to heavy rainfall and droughts at bad times in the growing season. This is an indicator of the effect that increasingly unreliable weather patterns may have on future production. When UK production is reduced, we are more dependent on imported commodities. The war in Ukraine has highlighted the vulnerabilities of such a strategy'.

However, in contrast Lincolnshire's crop yields in 2022 as mentioned were higher than a lot of the country due to the moisture retention of the clay soils in the local area. This highlights the value of this regions arable land to the nation.

- 10.5 Our farming members also advise us that the landscape produces high yields of good quality crops regardless of any perceived ALC grade. Landscape state (Section 3) 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 some Grade 4 but very little Grade 5.' Also, it states that; 'Even though the majority of the site is not BMV, there will be an impact on agriculture locally and across the county.'

The farming industry in the region is synonymous with the region. Lincolnshire is known as the breadbasket of the country. It produces crops of wheat, oilseed rape, sugar beet and potatoes. Alongside this, 'Lincolnshire is also home to around 25% of the UK's vegetable production, and 21% of ornamental crop production. This high level of production is vital to the county's economy, generating a Gross Value Added of £446m in 2012. To preserve fresh produce and minimise supply chain distance, highly productive food hubs have built up in the south of the county. The importance of this sector for the local economy is reflected in the number of jobs it generates: if this food supply chain is included alongside food retail and catering in the county, the number of employees exceeds 100,000.'

- 10.6 Therefore, with the loss of agricultural production for more than one generation (60+ years) there will be a long-term 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.

- 10.7 During construction of the Tillbridge Solar Project, Landscape (Section 7) has considered that soil structure 'can be significantly damaged during the construction phase of the process. There is inevitably 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.'

Farming members of our group have over many years and lifetimes worked the soil in this region and are aware of its characteristics. They are extremely concerned regarding the long-term damage to the soil structure and drainage and if in the future after these schemes have been removed, they find the soils are no longer viable to produce adequate crop yield, what redress is available to them beyond the lifetime of the scheme?

- 10.8 Has the Applicant assessed implications of the proposed scheme for all soil life? If analysis and appraisal has been carried out can the Applicant provide evidence of their findings on the impact of soil ecosystems.

11. Mental Health and Wellbeing

- 11.1 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).

- 11.2 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’.

- 11.3 In regard to the Tillbridge 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.’

- 11.4 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.’
- 11.5 The Environmental Statement for the Tillbridge Solar Project indicates that there is one Public Right of Way (PRoW) in the principal site and others along the cable corridor. The impact of the proposed works on the bridleway within the main site will need to be clarified. Furthermore, residents and users of the PRoW’s and the local rural roads as walkways will have their enjoyment of their usual walks negatively impacted potentially for a lengthy and undefined period.
- 11.6 This infringement on the health and social benefits people gain from the recreational value and use of PRoW’s and local rural roads as walkways, coupled with any cumulative effect from potential development of the Gate Burton, Cottam and West Burton Schemes, means that people’s mental and health and wellbeing will suffer.
- 11.7 Therefore, the walking routes will no longer provide access to green space and open countryside but to an industrialised landscape.
- 11.8 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 consequently. If the proposed development goes ahead, the likelihood is that these harms or negative effects will be worsened.

Landscape is perceived through all our senses. We derive pleasure and a connection from and with the landscape. Many residents and Interested Parties feel a strong connection to the area and a sense of belonging. The landscape and agricultural heritage are the key

identifying factors for the West Lindsey District and the wider region. Therefore, the Tillbridge Solar Project strikes at the very heart of the identity of the area and its people. This is a cause for great anxiety for many Interested Parties. The Tillbridge Solar Project constitutes a major sudden and significant change to the landscape, area and people's lives and consequently mental health and well-being.

The significant effects on the multiple views across the scheme over the various stages of its lifetime will have a profound effect on residents and interested parties' mental health and wellbeing. The rapid change to the landscape from agricultural to industrial will be catastrophic for many.

- 11.9 The extent of construction activities for the TSP for 5 or more years, in conjunction with the other 3 solar NSIP's in the locality, means that the people's ability to lead an ordinary life is detrimentally affected.

The 7000 acres group would ask the Examination Authority to consider and /or seek advice on the infringement of basic Human Rights of residents and Interested Parties within the scope of this Examination.

- 11.10 In contrast to the views of Interested Parties and residents, the Applicant concludes overall that the Tillbridge Solar Project at all stages of the Scheme will have no significant residual effects on human health (EN010142/APP/6.1).

12. Tranquillity

- 12.1 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'.
- 12.2 Several residents have stated that the landscape and green space affords them a degree of peace. This in turn we equate to mean tranquillity.

12.3 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'.

12.4 It is clear, from the conversations the group has had with residents from the neighbouring villages to the Tillbridge 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.

The peace and quiet afforded to residents in the landscape of the Tillbridge Solar Project is not only an asset it is in our view priceless. In today's, noisy, busy society, people's need for space and tranquillity is exacerbated. If this scheme is granted, tranquillity and peace in the surrounding landscape will be eradicated and when combined with the other three schemes in the West Lindsey District, the detrimental effect and noise will be relentless.

13. Conclusion

13.1 This written representation has discussed how the Applicant has provided contradictory documents and underestimated harms.

13.2 Significant impacts have been shown to affect most of the issues raised in this report.

13.3 Mitigation measures have been found to be inadequate and inappropriate.

13.4 Biodiversity and biodiversity net gain claims have been shown to be lacking validity. New evidence is constantly emerging which highlights harms.

13.5 Soil analysis results have also proven inadequate in terms of yield.

13.6 Negative impacts on mental health and wellbeing and enjoyment of the landscape as it exists have been highlighted.

- 13.7 The landscape 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.
- 13.8 Lastly, with the cumulative impact of potentially four Solar NSIP's in the West Lindsey District, it is arguable that we have reached a tipping point where the harm occasioned to the land and its component parts, the people and the biodiversity within it is beyond all reasonable limits.

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Tillbridge Solar Project Environmental Statement Chapter 16: Transport and Access EN010142/APP/6.1

Tillbridge Solar Project Environmental Statement Appendix 12-2 – LVIA Methodology EN010142/APP/6.2

Tillbridge Solar Project Environmental Statement Appendix 12-3 – LVIA Landscape Baseline EN010142/APP/6

Tillbridge Solar Project Environmental Statement Appendix 12-4 – LVIA Representative Viewpoint Descriptions EN010142/APP/6.2

Tillbridge Solar Project Environmental Statement Appendix Figure 12-4 A-H – Zones of Theoretical Visibility EN010142/APP/6.3

Tillbridge Solar Project Environmental Statement Appendix 12-5 - LVIA Assessment of Landscape Effects EN010142/APP/6.2

Tillbridge Solar Project Environmental Statement Appendix 12-6 – LVIA Assessment of Visual Effects EN010142/APP/6.2

Tillbridge Solar Project Environmental Statement Appendix 18-1 List of Cumulative Developments EN010142/APP/6.2

Tillbridge Solar Project Environmental Statement Figure 3 - 1: Indicative Principal Site Layout Plan EN010142/APP/6.3

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