

7000 Acres

7000 Acres Response to the Examining Authority's first written questions

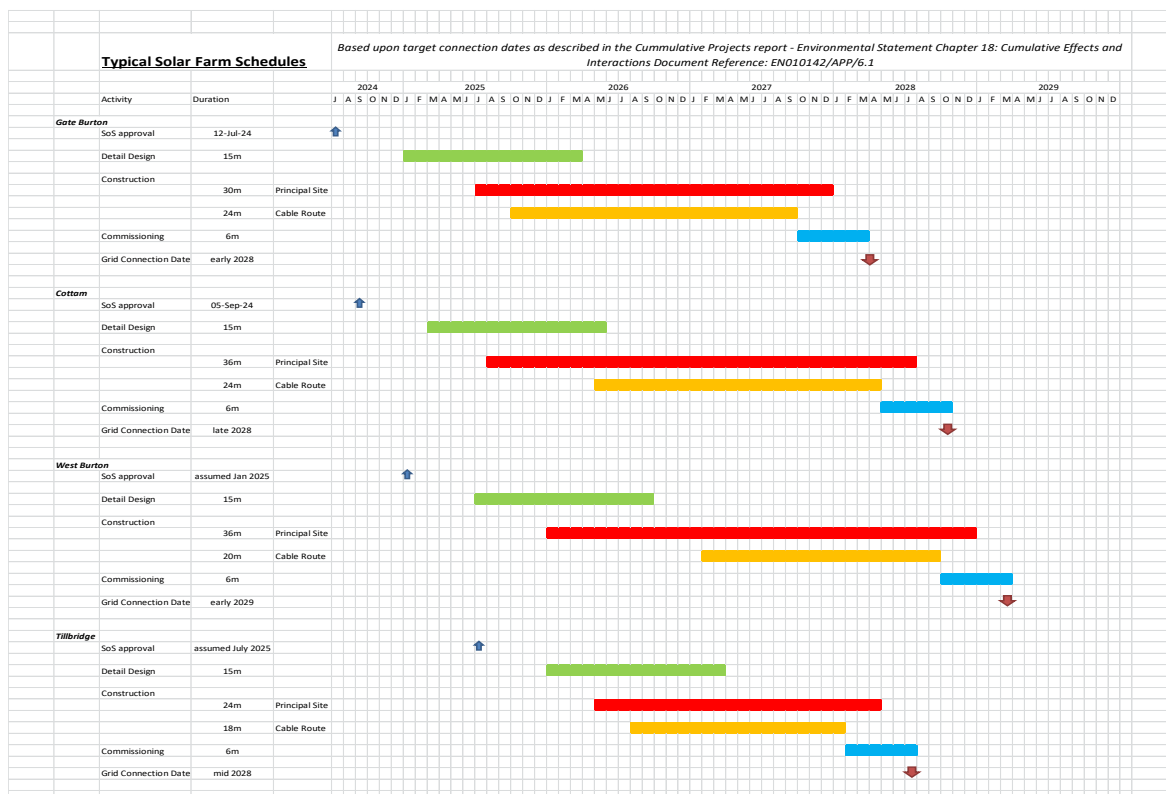
Deadline 3 Submission – 10th December 2024

Q1. 1.6 Cumulative construction period

The WLDC LIR [REP1A-005] refers to a ‘decade’ long construction period (see for example paragraph 8.14). Could WLDC please explain how it has concluded that cumulative construction could take up to a decade, with specific reference to the Applicant’s assertions to the contrary? Could the Applicant please provide a response as to whether a 10-year cumulative construction period is a realistic worst-case scenario?

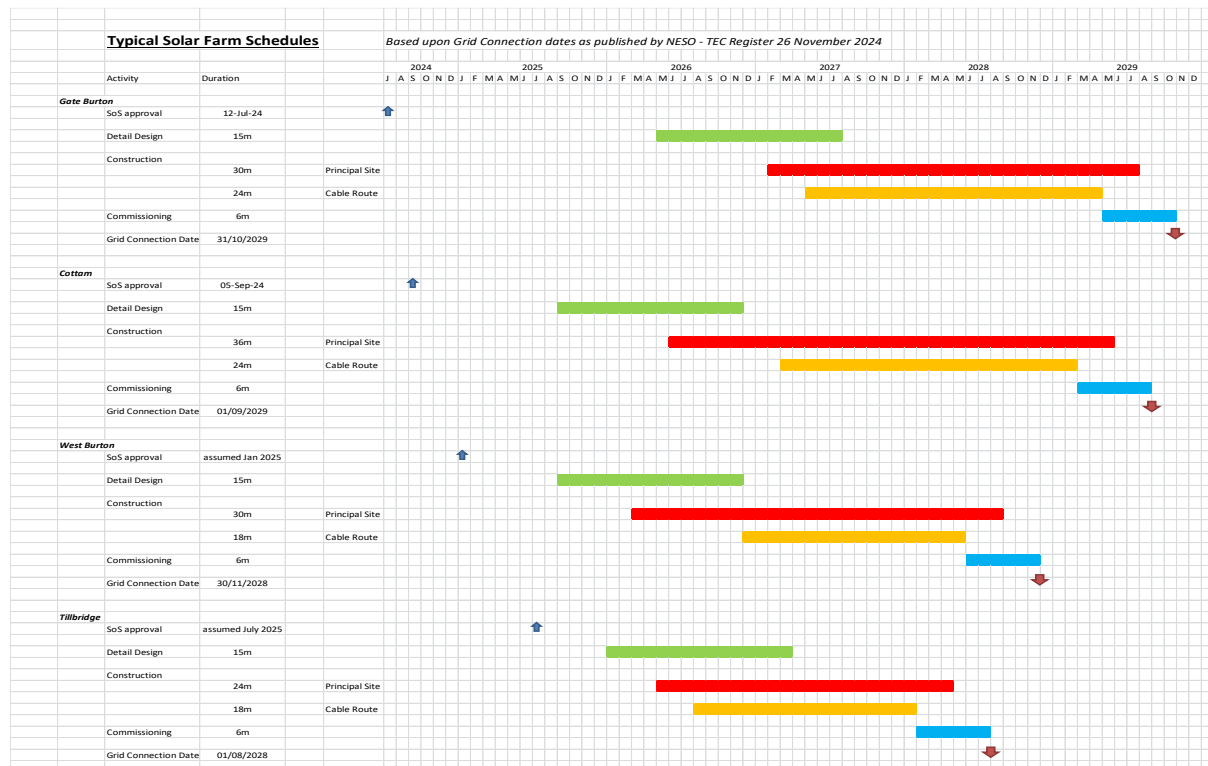
We have to advise that all of the applicants for the four Solar Projects; Gate Burton, Cottam, West Burton and Tillbridge, have not been very honest to date with regard to the cumulative effect on the construction period. Applying our members professional experience to the target schedules that the applicants have implied within the Cumulative Projects Report – Environmental Statement Chapter 18: Cumulative Effects and Interactions, document reference : EN010142/APP/6.1, indicates that staffing levels and transport will be significantly impacted.

Based upon our considerable professional experience with regard to identifying and establishing realistic schedules for proposed projects worldwide we have extracted the schedule parameters provided by the four applicants and created typical solar farm schedules covering Design, Principal Site Construction, Cable Route Construction and Commissioning for each project. Using the SoS actual approval dates or the assumed approval dates that the applicants have identified, as the start dates, we have created a simple schedule for comparison of the four projects. These activities were then reviewed with regard to the applicants identified construction durations and their target connection periods. This resulted in the following schedule:-



Analysis of this schedule identifies that cumulative construction would commence mid 2025 and be completed by the end of 2028, ie a three year six month time period. The grid connections would occur from early 2028 until early 2029.

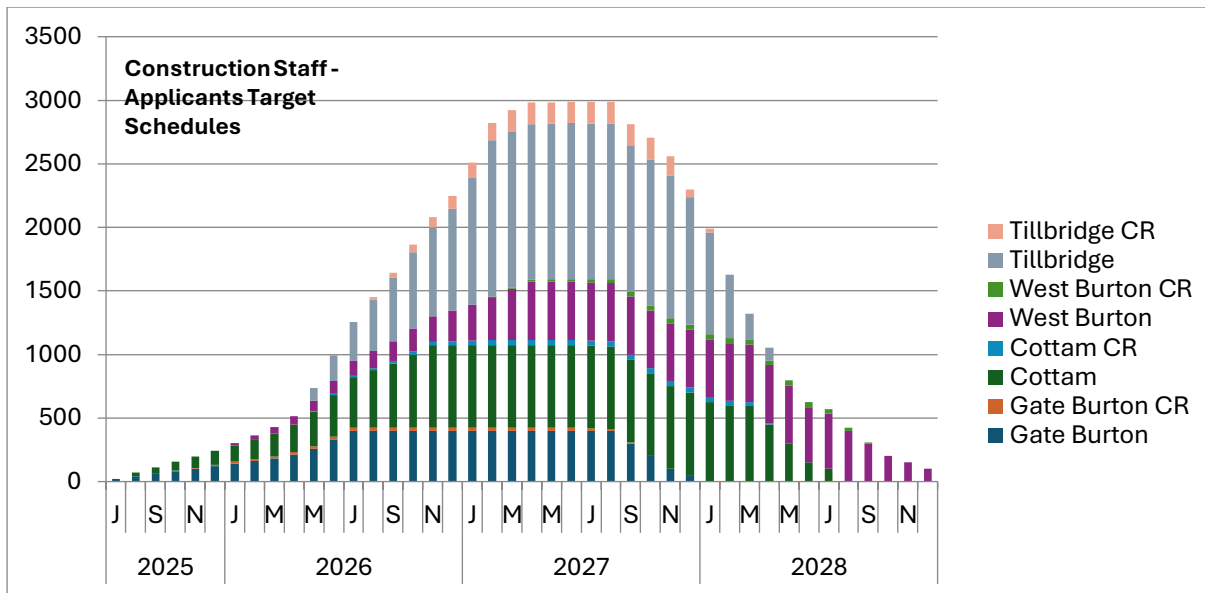
What the applicants have failed to advise the ExA's is that according to the NESO Tec Register dated 26 November 2024, the earliest grid connection date is 01/08/2028 with the last project having a connection date of 31/10/2029. Applying similar durations and timing relationships to the Design, Construction and Commissioning activities, but relating the completion dates to align with the grid connection dates, results in an entirely different sequence for the projects. We have assumed that the applicants would not want a completed project to sit unused for any length of time, so have delayed the start of design until later for some projects.



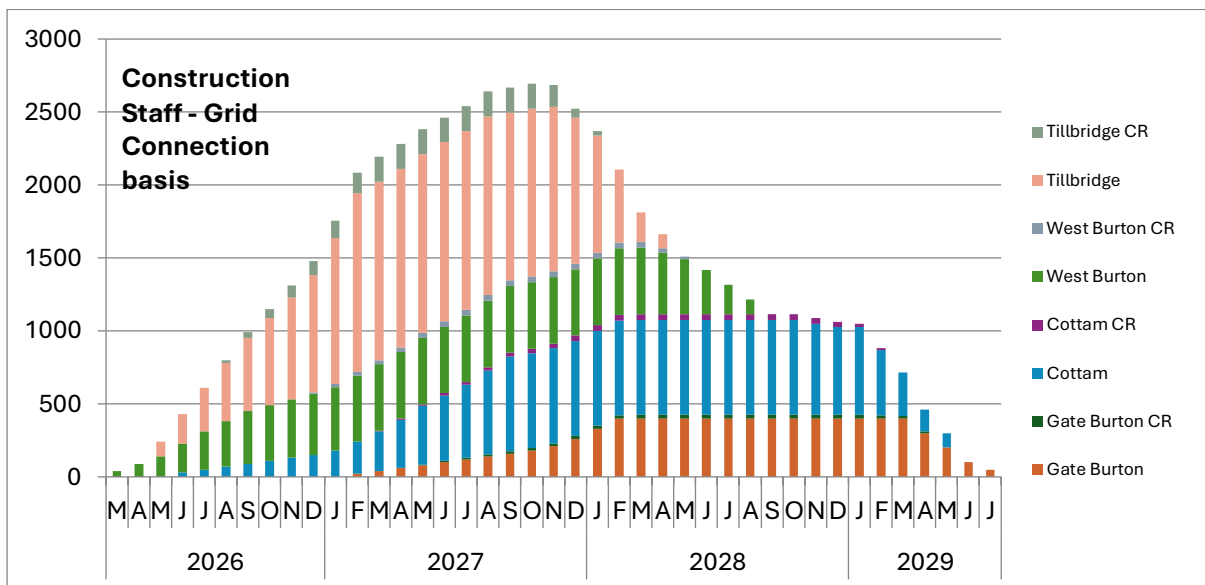
Analysis of this schedule identifies that cumulative construction would commence early 2026 and be completed by the mid 2029, ie a three year five month time period. The grid connections would occur from August 2028 until October 2029.

The impact of these delayed starts to construction, even though the overall construction periods are very similar, becomes more obvious when you consider the construction staffing and traffic movements.

In order to identify the construction staffing patterns the average and peak manpower details for the principal site and the cable route, for each of the four projects, was extracted from the Cumulative Projects Report – Environmental Statement Chapter 18: Cumulative Effects and Interactions, document reference : EN010142/APP/6.1. These numbers were then allocated against each of the scheduled activities using standard S curve applications associated with construction work. This has resulted in the following histograms:-



This histogram based upon the applicants target schedules depicts an average construction staff of 1366 people for 42 months, with a peak value of 3000.



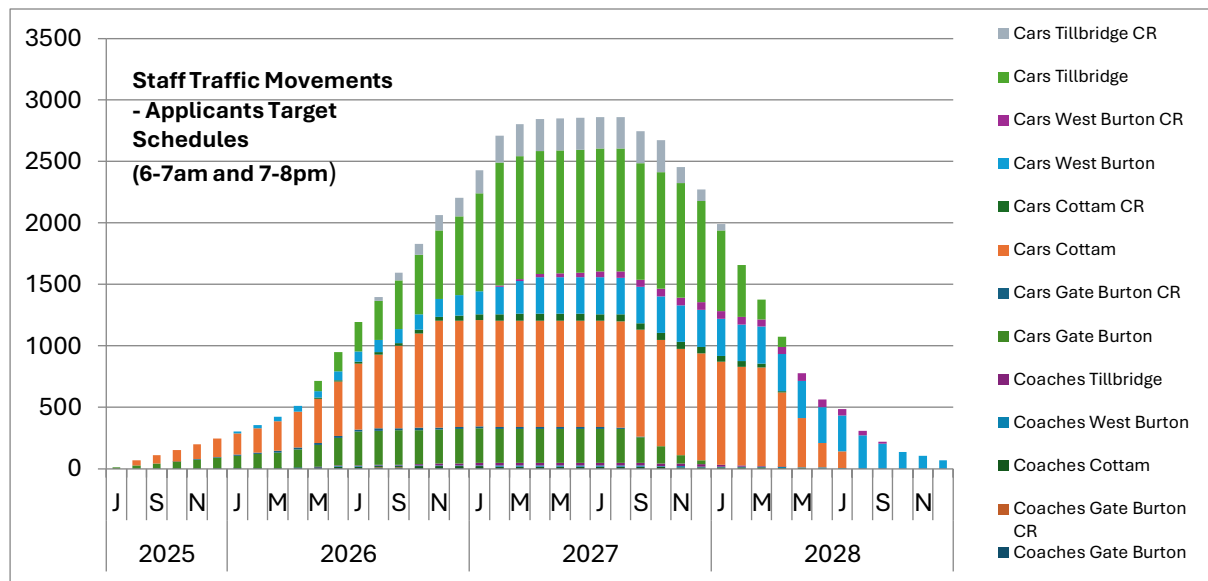
This histogram based upon the grid connection date schedules depicts an average construction staff of 1400 people for 41 months, with a peak value of 2700.

In addition to these construction staff numbers the number of people associated with Site Management, catering, welfare, security, warehouse management, commissioning etc. need to also be taken into consideration.

It has been assumed by each of the applicants that all of these construction staff numbers would be available from an area within 45km of the sites and that non-local workers would stay at local accommodation and be transported to the sites via shuttle bus to minimise the impact on the surrounding highway network. It is highly

unlikely that this level of suitable local accommodation is available within this agricultural area.

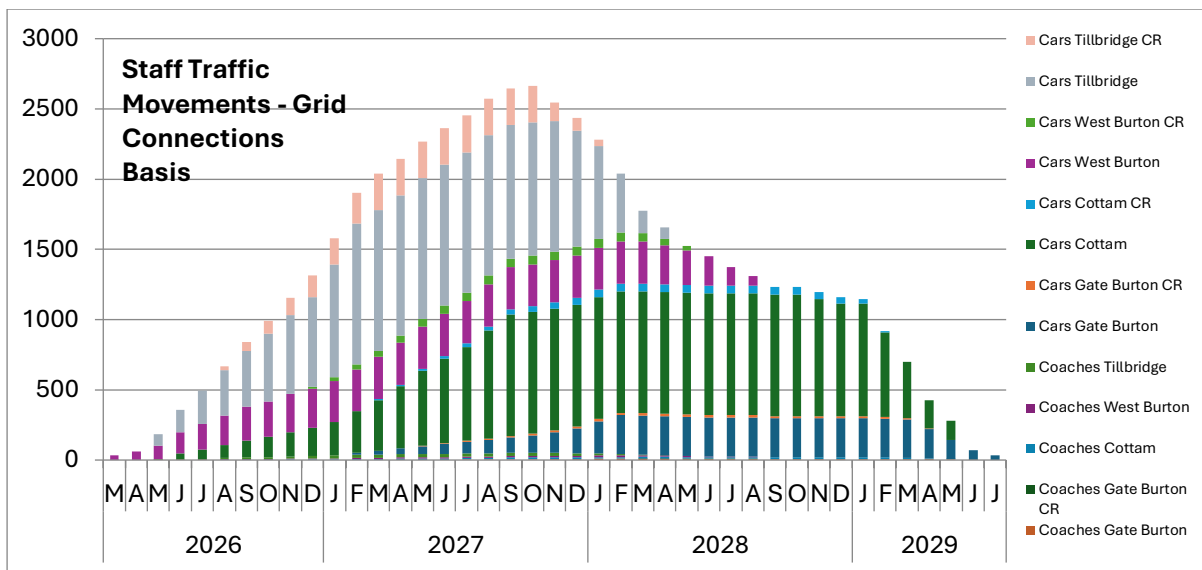
Another factor that this level of construction staff creates is the impact on local transport. By using the values that the applicants have included within the Cumulative Projects Report – Environmental Statement Chapter 18: Cumulative Effects and Interactions, document reference : EN010142/APP/6.1, and applying these values to the two schedules, using our professional experience associated with construction programs, we have derived traffic movement histograms for construction staff travelling by car and by coaches. This results in the following daily movement histograms:-



This histogram based upon the applicants target schedules depicts an average daily construction staff movement of 1322 for 42 months, with a peak value of 2864. This identifies as an average of 661 cars and coaches travelling to the sites each morning and 661 on the local roads each evening for the construction staff to return home, with peak values of 1432 each morning and 1432 each evening.

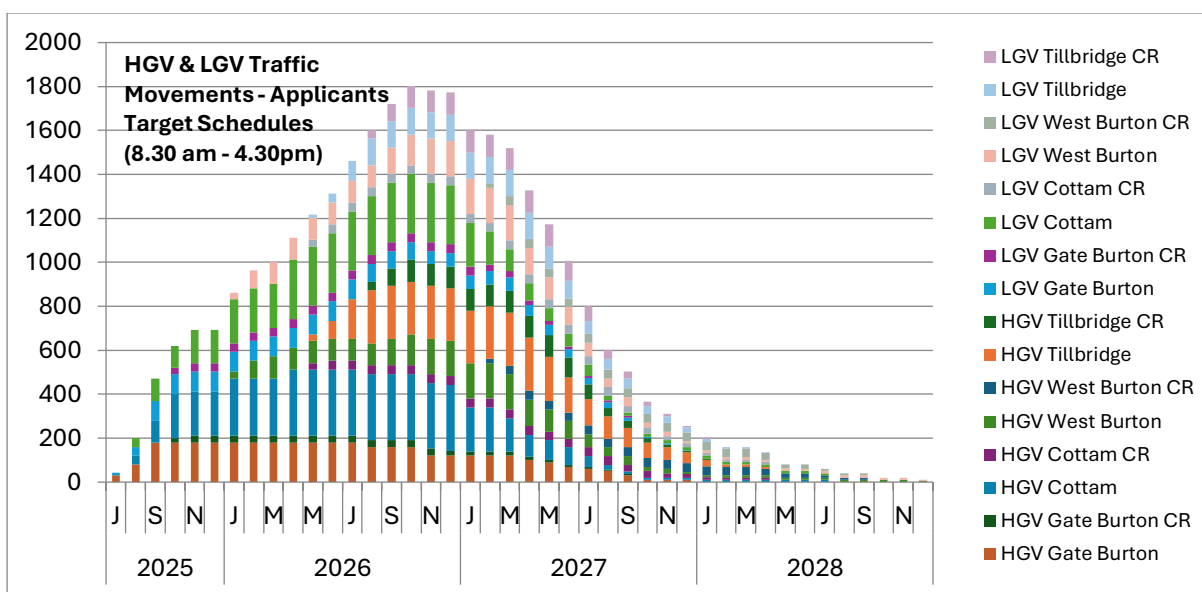
This increased level of cars and coaches travelling on the local roads each morning and each evening, for three and a half years, will definitely impact on the local residents' enjoyment of the lightly used local road network. It might also have an impact on the number of accidents occurring on the local roads and ultimately the insurance costs associated with vehicle ownership. This factor has been totally ignored by each of the applicants in their evaluation of cumulative impacts.

The equivalent histogram for the grid connection date schedule results in:-



This histogram based upon the grid connection date schedule depicts an average daily construction staff movement of 1354 for 41 months, with a peak value of 2666. This identifies as an average of 677 cars and coaches travelling to the sites each morning and 677 on the local roads each evening for the construction staff to return home, with peak values of 1333 each morning and 1333 each evening.

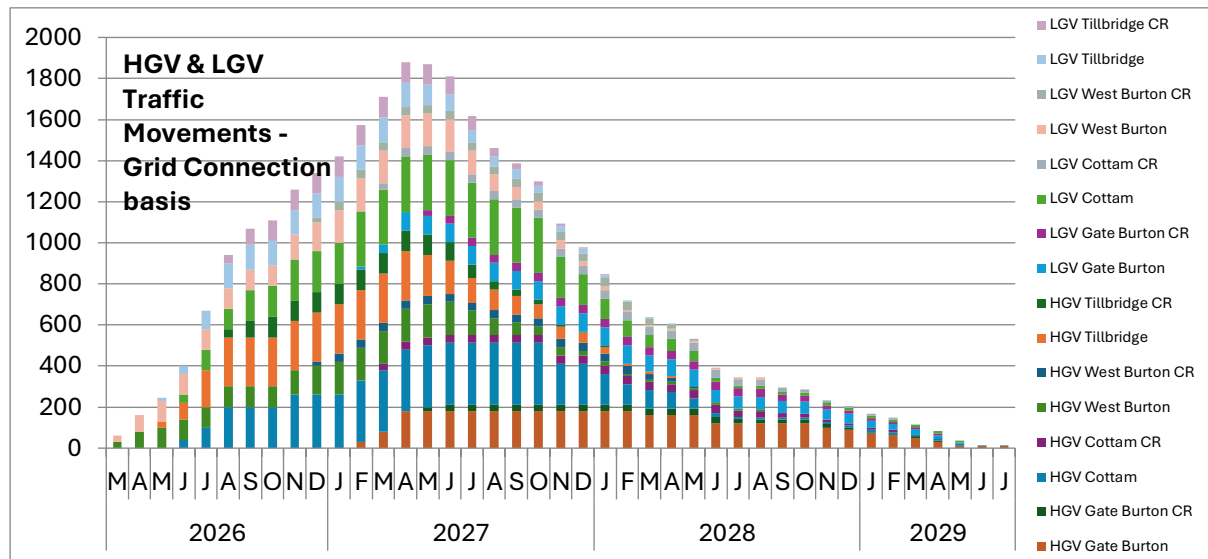
It is not just staff that will be travelling on the local roads. During each and every day there will be HGV and LGV vehicles moving goods to each location. The cumulative assessments contained within the Cumulative Projects Report – Environmental Statement Chapter 18: Cumulative Effects and Interactions, document reference : EN010142/APP/6.1, tend to concentrate on individual roads and as such play down the overall impact on all of our local roads of the magnitude of these lorries and vans on our daily lives.



This histogram has been derived by assigning the applicants quantity data of HGV and LGV vehicle movements to the scheduled construction activities. When evaluated against their target schedule it produces overall daily averages of 747

vehicle movements each day with a peak value of 1800. Therefore each weekday for 42 months we will have to encounter an additional 747 lorries and vans on our local roads. It will make each and every journey that much longer and with much more probability of delays or accidents. At each access point to the four projects we will be delayed by vehicles turning into and out of them, controlled by banksmen or temporary traffic lights.

The equivalent histogram for the grid connection date schedule results in:-



When evaluated against the grid connection schedule it produces overall daily averages of 765 vehicle movements each day for 41 months, with a peak value of 1880.

In conclusion the applicants have all failed to provide simple scheduling, construction staffing and vehicle movement data that the local population can understand so as to relate to the significant impact on their daily lives that these four solar projects will have upon them. Therefore this application for Tillbridge Solar Project should be rejected, as it will have too much of an impact on the local residents daily lives with very little benefit to the availability of renewable energy at times that the population need it.

Q1. 1.11 Good design:

All parties should be aware that Nationally Significant Infrastructure Projects: Advice on Good Design was published on 23 October 2024. All parties (in particular the Applicant and Local Authorities) are invited to submit representations on the implications of the advice note. In addition, could the Applicant please explain whether, and if so how, the Application complies with this advice?

Answer:

In 7000Acres WR REP2-027, Section 2.3, we highlighted the key requirements for “good design”, in particular, how infrastructure “relates to the landscape it sits within”

and that “applying good design to energy projects should produce sustainable infrastructure sensitive to place, including... efficient in the use of natural resources, including land-use”. It is clear that development of the scale of Tillbridge will inevitably become the dominant feature of the landscape, and is therefore fundamentally insensitive to the landscape.

Furthermore, 7000Acres highlight that the NPS notes the importance of “the functionality of an object – including fitness for purpose and sustainability”. Within the same WR, 7000Acres have provided evidence that the potential contribution of extensive solar development is compromised in many ways, which therefore undermines the functionality of the development. This shortfall in overall functionality implies a poor overall design concept and should be given weight when considering the harms presented by the development.

Further to the concept of good design and functionality, within NPS EN-1, the Secretary of State is also directed to be “satisfied that the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics”.

Q1.1.18 Overplanting

Paragraph 5.2.1 at Appendix B of the Written Summary of Applicant’s Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046] outlines that the Proposed Development would be overplanted at a ratio of 1.57 (157%). Could the Applicant please provide evidence to demonstrate what ratios typically apply to other schemes (either consented or in the process of being consented – for example Gate Burton, West Burton and Cottam) and justify any difference in the ratio of overplanting proposed?

Please note footnote 92 of NPS EN-3 requires a justification to be provided for overplanting.

Answer:

In 7000Acres WR REP2-027, Section 8.3, we highlighted that overplanting, as referred to in NPS-EN3 is foreseen only in terms of how “installed generating capacity of a solar farm will decline over time in correlation with the reduction in panel array efficiency”. The Applicant has clearly set out the economic objective of maximising utilisation of grid capacity, rather than to address foreseeable panel degradation.

With regard to the ratio of 1.3 to 1.5% overplanting, this simply represents an economic trade-off between the additional costs of deployment and land, versus the marginal benefit of being able to make greater use of the grid connection. This is the economic case made in the Applicant’s Statement of Need, and therefore does not relate to the decline in panel efficiency over time.

If the developers had confidence in their claims of future improvements in technology, by the time the solar panels are life-expired and require exchanging, these could be replaced with panels that take less land, however, their assumption is to overplant from day 1, and therefore occupy up to 50% more land than necessary,

showing their lack of commitment to minimising or mitigating the impacts of their development.

In practice, it should be noted that, by overplanting, the yield would therefore be reduced – from an already meagre 10%-11% in the UK, which results from being in an area of such low solar gain. This means that the energy production and therefore decarbonisation potential of panels in an overplanted scheme in the UK would be some of the lowest worldwide – which should be thoroughly explored in terms of what this means for the genuine carbon reduction potential of the panels, or indeed the efficient, sustainable use of global resources.

Q1.1.19 Overplanting

Could the Applicant please confirm whether panel replacement has been factored in when considering the degree of overplanting required/ deemed necessary? If so, please confirm the assumed rate of Panel replacement over the lifetime of the project?

Please see our response to Q 1.1.18

Q1.1.20 Overplanting

Paragraph 8.2.12 at Appendix B of the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046], states in full:

"The Mallard Pass Solar Farm [EN010127] has an overplanting ratio with a range of 1.3 to 1.5 times multiplied by the grid connection agreement. In his decision letter, the Secretary of State concluded that the overplanting ratio was justified and reasonable. This decision is important and relevant given that this Scheme falls within a similar range."

Please could the Applicant direct the ExA to the evidence contained within the SoS Decision Letter and ExA Recommendation Report to support this? Please also confirm what proportion of land would be overplanted for the Mallard Pass Scheme, with specific reference to the ExA Recommendation Report.

Please see our response to Q 1.1.18

Q1.1.22 BESS – "Possible Services"

Paragraph 8.3.9 at Appendix B of the Written Summary of the Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046] outlines in part:

"Using the current indicative Scheme design, it is estimated that the BESS will be charged by the solar PV array on approximately 30% of the days in a year."

If that is the case, then what function is the BESS fulfilling for the majority of the year (70%)?

Answer

The most significant challenge to making the deployment of large solar capacity a success is the potential to be able to store energy from the summer, to avoid curtailment, for use in the winter. The proposed Battery Energy Storage System (BESS) cannot deliver this. The most significant challenge to making the deployment of large solar capacity a success is the potential to be able to store energy from the summer, to avoid curtailment, for use in the winter. The proposed Battery Energy Storage System (BESS) cannot deliver this.

Due to the lack of information provided it is difficult to assess the planned capacity of the BESS. However, reading across from similar systems in the area, a 500MW BESS would only be capable of storing 1 hour of peak generations in summer (circa 500MW for the main scheme plus 50% overplanting). Therefore it will make a minimal contribution to offsetting solar generation from when it is not required on a warm summer day to peak demand in the evening. However, it will make a significant contribution to the profitability of the scheme by permitting energy arbitrage at night and in the winter months when it will store energy from other sources, including those generated by fossil fuels. If the BESS is not supporting the solar scheme for 70% of the year, the income from the BESS is clearly additional revenue.

As the Consent will be for operating a “generating station”, revenue operations when the scheme is not capable of generating power should be viewed as a separate system. The PA (2008) Associated Development Guidance states in paragraph 5 (iii) that:

“Developments should not be treated as associated development if it is only necessary as a source of additional revenue for the applicant, in order to cross-subsidise the cost of the principal development”.

Q1.24 Maintenance

Section 4.3 of the Written Summary of the Applicant’s Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046] states in part:

“Wholesale replacement of all Scheme components is not authorised under Article 5(1), with assumptions around HGV traffic in the Framework OEMP and Chapter 16: Transport and Access of the ES [APP-047] reflecting this approach.”

Answer

Although the *“wholesale replacement of all the schemes component is not authorised”*, piecemeal replacement of all components will be permitted on a rolling basis due to the lax wording of this requirement. As the Applicant’s greenhouse gas emission calculations is based on only one replacement cycle of the solar panels, and 10 years replacement of BESS batteries, this should be made an explicit limit in the dDCO.

Q1. 1.28 Need

Many representations from Interested Parties have challenged the ‘need’ for the Proposed Development and refer to other technologies or roof-mounted solar development. Notwithstanding the information contained in the Applicant’s existing application documents, could it please succinctly set out a response with specific reference to the key policy and legislative differences between the current project and the Cottam, West Burton and Gate Burton NSIPs?

Answer:

While the overall policy and legislative landscape for the Tillbridge scheme is broadly similar to that for the Cottam, West Burton and Gate Burton NSIP schemes, it is clear that more information is now known about the volume of solar development required.

Since the Government’s ambition for 70GW of solar was launched in 2022, there have been several calls to ensure a planned deployment of solar as part of a land use strategy, e.g. from Skidmore¹, and the Government has accepted calls for a Strategic Spatial Energy Plan, e.g. from the Electricity Network Commissioner’s Report (2023)².

The newly formed National Energy System Operator (NESO) was commissioned in October 2024 to produce the SSEP. In addition, it was asked by the DESNZ to provide advice on how best to meet the new Government’s ambition to bring forward the target of decarbonising electricity generation to 2030 from 2935. Their Clean Power 2030 report (November 2024) provides important context for the implementation of solar.

Figure 14 of the NESO CP 2030 report provides a high-level spatial capacity map of technology needed for different pathways, including solar. Following the many calls for a planned consideration of how much and where solar technology should be deployed, and this is the first time this has been done. The report provides a broad regional breakdown of solar installation across the country. Supporting data for the maps within Table ES5³ show around 7.6GW of solar installed for the “East of England” region, and although there isn’t a direct read-across between NESO’s regions and the NSIP applications database⁴, it is notable that there are already 22 solar schemes on the NSIP database for nearest equivalent area (Eastern and East Midlands), with an estimated capacity of c. 11GW. In addition, within the Renewable Energy Planning Database⁵ there are 150 further non-NSIP scale ground-mounted solar schemes within the counties of the same region, either within planning or pending construction. This illustrates the situation of uncontrolled and excessive

¹ [MISSION ZERO - Independent Review of Net Zero](#)

² [REDACTED]

³ [REDACTED]

⁴ [Register of applications](#)

⁵ [Renewable Energy Planning Database: quarterly extract - GOV.UK](#)

development within the region, which is way over that anticipated by NESO to achieve the Clean Power 2030 objective.

It is also worth noting that the schemes and capacity above do not include any rooftop solar capacity, despite the Government's ambition for a "rooftop revolution" for solar installation. All this explains the urgency of developers to get schemes consented, before adequate controls are applied.

The CP2030 report also highlights that, in addition to current solar installation (c. 16GW), there is already a pipeline of 70GW of solar by 2030, plus a further 47GW by 2035. Again, much of this pipeline represents transmission or distribution connected solar capacity – which will be at least substantially, if not entirely ground mounted.

The current uncontrolled scramble for ground mounted solar simply risks allowing schemes to be placed on a first-come-first-served basis, rather than properly considering how and where solar should be deployed – including the capacity required for rooftop solar – which, under the current appetite for developers to pursue ground mounted schemes, will be next to zero. 7000Acres have already highlighted the example of Germany, which has already achieved more than the UK's ambition of 70GW of solar, with over 70% on rooftops – and without a single scheme even half the size of the proposed Tillbridge scheme. The need case presented by the Applicant is overstated to suit their purpose.

In addition, the Land Use Framework promised by the Government remains overdue, but it is clear that solar schemes have the potential to occupy a significant amount of land, which must be properly considered before extensive solar development is consented without fully understanding the implications. Already the pipeline of Transmission and Distribution connected solar schemes visible to National Grid are in excess of 150GW, which would imply an area twice the size of Greater Manchester. Even if all this is not constructed, it constitutes a massive burden on planning processes, consultancy resources and the communities affected.

Q1. 1.29 Alternatives

Could the Applicant please succinctly set out what it considers to be the policy and legislative requirements in respect of considering alternative sites?

Answer:

The Applicant has been selective as to which clauses to lean into to support its choice of how it deploys solar. It has not used any brownfield, contaminated land, nor has the Applicant made a clear case for the use of farmland, as is required within the NPS. In addition, the Applicant has not considered any rooftop solar. The Applicant has sought to create a proposition which provides the easiest route to the greatest financial return – for which they cannot necessarily be blamed, but in doing so, it purports to strive to achieve the higher purpose of decarbonisation, but in fact takes advantage of the current absence of a land use framework, strategic plan for solar deployment, the landscape of weak farming economics and complexity around rooftop liabilities.

Q1. 2.8 Species Impact: Ground nesting birds

What is Natural England's view on the likely impact on the scheme and whether it results in a net displacement of bird population or encourages ground nesting due to lack of predators? Ref: 6.2 Appendix 9-8 Baseline Report for Non-Breeding Birds [APP-089]

Answer:

Birds of prey are a vital predator within the local ecosystem and have been present in the landscape over many, many generations. Their important historical presence and value are illustrated in that the name Glentworth derives from the Old English glente + worth for 'enclosure frequented by birds of prey'. Potential impacts on this specific predator will not only affect the ecosystems and biodiversity it will also impact the historical fabric of the area as the land, wildlife and communities have a symbiotic relationship symbolised in the origins of the name of Glentworth.

Q1.2.9 Species Impact: Bats

Is there any evidence to establish the impact on commuting and foraging bats of the presence of large areas of solar panels? Ref: 6.2 Appendix 9-9 Baseline Report for Bats [APP-090].

Answer:

Research is showing that ground mounted solar has a significant adverse impact on protected bat species. For example, research paper:

“Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity. Elizabeth Tinsley, Jérémy S. P. Froidevaux, Sándor Zsebők, Kriszta Lilla Szabadi, Gareth Jones. published August 2023.”

Q1. 2.10 Biodiversity Net Gain:

The results of the assessment indicate that the current illustrative design for the Scheme is predicted to result in a net gain of 64.55% for area-based habitat units, 17.33% for hedgerow units, and 22.94% for watercourse units. How does this provision of biodiversity net gain align to the biodiversity impacts lost and specifically to those species relying on the existing biodiversity provision. The scheme alludes to providing over 1,000 hectares of new grassland creation. This is presumed to be principally the land area under the proposed solar panels. How will this biodiversity provision compare the biodiversity lost from the existing situation i.e. arable fields; and how will this grassland compare to grassland unencumbered by the overshadowing of solar panels.

What are the mechanisms within the DCO for securing BNG creation and ensuring its ongoing maintenance as required. Ref: 7.14 BNG Report [APP-226]

Answer:

Biodiversity Net Gain is a very new addition to planning requirements in the UK, having been due to apply in November 2023, it is now due to come into force from January 2024, and apply to Nationally Significant Infrastructure Projects in 2025.

There is very little experience or track record of its use as a methodology, and while a number of case studies have been published, e.g. by Natural England, these are hypothetical illustrations of the methodology, and cover relatively small areas of development (<10ha.) in comparison to large scale solar development (e.g. solar developments at over 1200Ha.)

The baseline fails to recognise the pressure that farming is under to change over this time period, either in terms of decarbonisation or biodiversity – and therefore to assume the baseline would have remained unchanged for the duration of the project is flawed.

Q1.7.5 Historic Landscape Character

ES Paragraph 8.9.444 [APP-039] states in full: “Construction of the Scheme within the Principal Site would result in the long-term change of land-use from intensive agriculture to solar park renewable energy generation. Despite this, the Scheme preserves the pattern, layout and key boundaries and features of the historic landscape, enabling the grain of the two historic landscape character zones to retain their coherence, time depth and legibility. This is assessed as a low magnitude of impact on historic landscape character zones of medium value, resulting in a long-term minor adverse magnitude of impact, which is not significant.”

Answer:

By proposing to cover the existing Historic Landscape in solar panels along with associated equipment whilst utilising the existing field pattern does not mean that the two treatments can be read together within this landscape. The use is profoundly different and in stark contrast to the existing and therefore means that the landscape cannot be read as one as it is now.

Also, the Applicant states that ‘coherence, time depth and legibility’ will be retained. 7000 acres disagrees with this statement. The landscape will be under the proposed development. Visibility and understanding of the land and landscape is removed from view by the scheme.

The views from the ‘Lincoln Cliff’ are wide and long across the Historic Landscape. The atmosphere is majestic and timeless. By removing existing established hedgerows and trees and planting hedgerows and trees to ‘screen’ the proposed scheme, the Applicant is removing planting that adds to the view and is replacing it with planting that blocks the view. These proposals fundamentally harm the historic landscape.

Q1.8.1 Health & Mental Health Effects

Numerous representations have been received stating that members of the community local to the proposed development have suffered health effects during the development of this application and will continue to do so, and potentially increase during the construction period and throughout the life of the development. Could the Applicant address this concern and assess the potential for impact; and highlight any measures put in place to reduce and minimise these impacts. An assessment of the associated impact on mental health of communities adjacent to large scale development should be prepared.

Answer:

7000Acres welcome the line of questioning with regard to Health and Mental Health impacts, but feel it is imperative that the impact on communities of cumulative development must be considered. See also 7000Acres REP2-032 for further details.

Q1.9.4 ZTVs

ES Paragraph 12.4.13 [APP-043] states in full: "It should be noted that the ZTVs for the solar PV panels do not demonstrate the theoretical visibility of such features across the entire Principal Site. Due to computer processing capabilities, reference points were taken from the outer boundary of the Panel areas. As such, some areas of panels, particularly along slightly higher topography such as the north-south ridge between the A631 and Harpswell Wood, may increase theoretical visibility beyond that shown."

Answer:

Without accurate and representative modelling, findings of the Landscape and Visual Impact Assessment are brought into question along with any subsequent measures.

7000 acres argues that it is not acceptable for the Applicant to guess.

Q1.9.11 New Bridleway Update

ES Paragraph 12.6.17 [APP-043] states: "At the time of ES preparation, an application to claim a new bridleway has been submitted to LCC, reinstating a section of the historic 'low' route along the base of the Cliff between Harpswell and Glentworth, parallel to Middle Street." Can LCC and the Applicant please provide an update?

Answer:

Both Glentworth Parish Council and Harpswell Parish Council have spent many years seeking the reinstatement of this historic route for the enjoyment and health and wellbeing of their communities. It affords an important physical link between the villages for people in the area and further afield. This is a route which communities

wish to use within the historic landscape and enjoy the long views across the Till Vale once again.

Q1.9.18 Effect of mitigation planting

LCC LIR paragraph 5.14 [REP1A-001] states in part: “This reduced to three receptors or viewpoints experiencing significant residual effects at year 15 which suggests a potential over reliance upon mitigation planting to screen the proposals without full attention to the potential impact of this screening on the landscape.”

Answer:

The reduction in significant effects from eleven at Year 1 to three and Year 15 is attributed by the Applicant to the planting of hedgerows and trees and these becoming established during this timeframe. The question arises when, if the planting fails and does not become established or does not create a screen or indeed screens the views of the historic landscape, then it can be argued that the Applicant’s plan to reduce the effects on visual receptors is purely reliant on mitigation planting. Apart from planting, there are no further mitigation measures. Moreover, the mitigation planting may detrimentally affect or harm the effects on visual receptors and views as mentioned. This action will compound the negative effects of the scheme.

7000 acres are of the opinion that mitigation planting will not be successful in part due to localised browsing and as such the presence of poor planting along with exposed views of the Tillbridge Solar Schemes will harm views and visual receptors.

Q1. 11.1 Amenity

Planning Statement 6.14.30 states: “The assessment of amenity effects in Chapter 14: Socio-economic and Land Use of the ES [EN010142/APP/6.1] has considered effects from Chapter 16: Transport and Access, Chapter 13: Noise and Vibration, Chapter 12: Landscape and Visual Amenity, and Chapter 6: Air Quality of the ES [EN010142/APP/6.1]. It concludes that considering the residual effects of these assessments results, and the proposed mitigation including woodland and hedgerow planting, appropriate control measures during construction and decommissioning and the securement of design principles for the detailed design, there would be no receptors that would experience a significant effect on their amenity, and as such there would be no effect during all phases of the Scheme.” How is this paragraph consistent with the conclusions on 'effect interactions' at ES Table 18-7 for certain residential receptors where 'significant effects' have been identified?

Answer:

7000Acres believe that the concept of amenity has been considered far too narrowly. Typically, the network of small roads is available to link footpaths and bridle ways, and provide amenity for residents for walking, cycling and riding. Transforming the landscape would damage the enjoyment of this amenity, reducing the positive health

and wellbeing benefit people gain from exercising in a green space. The local villages have few “conventional” amenities, e.g. shops, cafés/restaurants, transport, however, what they have is a rural, green-space location which people have chosen to live in. This would undoubtedly be damaged by such extensive development as Tillbridge and other schemes.

Q1. 12.3 Agricultural Land

How does the baseline report align to the requirements of the written ministerial statement “Solar and protecting our Food Security and Best and Most Versatile (BMV) Land” issued on 15 May 2024?⁶ Ref: 6.2 Appendix 15-2 Agricultural Land Classification Baseline Report [APP-116].

Answer:

The Applicant has disregarded the qualification within the NPS that the case for agricultural land must be made first. Instead, they have focused on the classification of ALC grades, asserting that, because the much of the land is not strictly BMV, it will be assumed to be acceptable to be used in whatever quantity of area the Applicant demands. In practice, the land is productive farmland, and by disregarding this, the Applicant has failed to consider the requirements of the ministerial statement, which states that “developers must also have consideration for ongoing food production.”, and that “a greater onus on developers to show that the use of higher quality land is necessary”.

Notably, the ministerial statement also highlighted the work the Government was doing to unlock rooftop solar development and the opportunity to reduce bills by fitting solar to homes.

Q1. 12.6 Agricultural Land

What has been the agricultural use of the land within the order limits for the last 10 years, including planting, ploughing and harvesting regime, yields and net production? How does this compare the average yields for the region and nationally; and what is the effective net reduction in agricultural output by taking these fields out of production for the next 60 years?

Answer:

The development is one of many schemes that are set to transform of land use in the UK, therefore, apart from considering the last 10 years’ production, there should be consideration of what would have been required from farming over the lifetime of this and other scheme(s), i.e. 60+ years or more.

⁶ [Written statements - Written questions, answers and statements - UK Parliament](#)