**IP NUMBER: 20049933**

**TILLBRIDGE SOLAR – DEADLINE 3 – 10 DECEMBER 2024**

**ExQ1: 19 November 2024**

Q1. 2.10 Applicant Natural England 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.

***In respect of Ex Q1: 2.10 above**:-*

*Can Natural England and /or the Applicant please confirm how the 22.94% net gain for watercourse units has been arrived at and which watercourse unit module / metric was applied to the following features: priority rivers; other rivers and streams; canals; ditches; and, culverted sections ? The percentage quoted for watercourse units in this instance mean very little to the reader if one cannot understand the process to arrive at this number.*

1. How much of the 22.94% net gain relates to reducing/eliminating the use of fertilisers and nitrates on agricultural land on the proposed Tillbridge Solar Project site which make their way into watercourses ?

   The proposed Tillbdrige solar site would be located at the lower level of the Cliff Edge road (B1298) and agricultural and farming land also encompass the length of the high ground along this Cliff Edge road. Rainwater and fertiliser / nitrates from this agricultural and farming land will make its way to the land and fields at the lower level of the Cliff Edge and onto the Tillbridge Solar site.

2. Is water quality tested to determine this 22.94% net gain and if so:-

   a) where is the water taken from ?
   b) how often is testing carried out before the above percentage is arrived at, and
   c) if not, why not ?

3. Sewage pollution in the River Till near Lincoln, which is a priority river (as referenced above) is a significant issue. The River Till has been affected by sewage overflows, which have actively discharged sewage into the river. The water quality in the river has also been impacted by modification of the river channel and agricultural run-off which leads to a variety of adverse ecological effects, however, the stressor which has the greatest impact across all ecological functions ranking first is wastewater (sewage) not agricultural run-off. Wastewater (sewage) pollution has the potential to alter and degrade critical ecosystem processes via loss of critical species.

   This river rises as a series of streams close to Corringham, nr Gainsborough and passes Sturgate, Heapham and Springthorpe villages, some of the 30 villages and communities which will be completely negatively and harmfully affected by this development and the

solar developments of Gate Burton, Cottam and yet to be decided by the SoS, West Burton solar.

*i)* Does the 22.94% net gain take into account the sewage pollution discharged into the River Till and consequently its tributaries referred to above ***particularly as phosphate pollution from sewage contributes 80% while agriculture contributes 20% ?***

Much emphasis has been placed on synthetic fertilisers leaching from agricultural land into waterways, which is far from ideal. However, NSIP scale Solar projects also being pushed as a solution to this problem with land being taken out of food production for 60 years is utterly dishonest to the residents and communities across the UK. We are being duped. New research by the University of Oxford's Department of Biology reveals that sewage discharge into rivers has a greater impact on water quality, and the animals and plants that live in rivers, than surrounding land use. The Department of Biology also investigated the effects of three different pollution sources (treated sewage discharge, agriculture and urban run-off) on different aspects of river systems. The group tested four rivers in England both up and downstream of sewage discharge, over three different months.

The University of Oxford findings have been published in the journals Global Change Biology and Ecological Solutions and Evidence.

The results demonstrated that treated sewage discharge was the best predictor of high nutrient levels, bottom-dwelling algae, and sewage fungus abundance, regardless of the type of land use (agriculture or urban) in the surrounding area.

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