

**7000 Acres**

**7000 Acres Response to the Tillbridge Solar Application on the subject of:**

**Socio-Economics and Land Use**

Deadline 2 Submission – 14<sup>th</sup> November 2024

## Executive Summary

### Methodology – Study Area and Geographical Range Considered:

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

- The Study Area used by the Applicant to reference baseline conditions has been chosen very widely, across a 60-minute drive region, or Bassetlaw and West Lindsey, thereby avoiding having to highlight the specific socio-economic difficulties of Gainsborough, the nearest town to the Tillbridge Project (CSP)
- The same breadth of area has been used by the Applicant as reference area for considering employment and economic activity, which has an averaging effect on the assessment, and therefore also fails to highlight the specific socio-economic difficulties of Gainsborough.
- The Applicant has therefore failed to consider the immediate impacts on communities closest to the proposed scheme.

### Deprivation:

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

- Considering the area with a greater level of resolution shows the significant scale of deprivation issues facing the community of Gainsborough.

### Employment:

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

- Limited interpretation of likely roles would suggest that any job creation locally will be in lower skilled, lower paid roles, and be unlikely to sustain livelihoods in the same way that jobs lost from agriculture.
- There is little or no community benefit through employment from the development, in an area that is in desperate need of jobs and prospects. The loss of farming livelihoods therefore can only be seen as an erosion of opportunity.
- The Applicant refers to the loss of 10 agricultural, although there does not appear to be any detailed breakdown of how this figure is reached, therefore the basis upon which the number of agricultural jobs lost has been calculated cannot be scrutinised.

**Land Use:**

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

**Amenity:**

The ES fails to acknowledge the importance of PROW's for amenity, and in practice, that it is frequently the minor roads that serve as the amenity for walking, cycling and horse-riding. The impact of 3.5m to 4.5m high panels in proximity to the use of minor roads in this regard does not appear to have been considered in the ES.

The Applicant has not considered the importance of the landscape to a community that, in the 2021 Census recorded having "bad" or "very bad" health, at levels above the national average. By adversely affecting local amenity, the scheme would therefore exacerbate the existing health and wellbeing issues faced in the region.

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

**Local Plans:**

A significant amount of work has been carried out in the region to develop plans for the future of the region. This work has been extremely conscious of climate change and actions to decarbonise the economy, however the development of large-scale ground mounted solar as a contribution to the development of the region was not envisaged.

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

**Overall**

Within the ES, having followed its own carefully crafted methodology, the Applicant concludes that the scheme will have only minor adverse or beneficial effects, and completely fails to appreciate the significant impact of development at this scale, primarily by considering extremely broad areas,

when many of the impacts will fall on a concentrated area within West Lindsey. When considering the “in combination” impacts of other NSIP scale solar developments within the same immediate area, conclusions are drawn in a similar way.

The assessment fails to consider that these negative impacts will be most severely felt in the concentrated area around the Tillbridge and other NSIP-scale developments.

Overall, the ES for socio-economics is simply not credible. This can be best highlighted using examples from the Table 14-21 “Summary of residual effects” from the ES itself. Over the course of 40 years’ operation, according to the Applicant there are “no effects” on employment, community severance, PROW, land use and local amenity. By contrast, despite being only being a tiny part of the development, the Applicant has identified a “minor beneficial effect from additional permissive pathways. Across everything during the operation, the Applicant has identified nothing adverse on the villages and communities despite the colossal size of the development. It raises a question how anyone is expected to believe that development at this scale could be so benign, nevertheless the Applicant concludes “There are no significant effects on socio-economics or land use expected during the operational phase of the Scheme”.

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

The Tillbridge solar project is inconsistent with local plans and ambitions for the future development of the region.

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# 1 Methodology – Study Area and Geographical Range Considered

Chapter 14 of The Tillbridge Solar Project Environmental Statement considers Socio-Economics and Land Use. The document describes the methodology by which assessments will be carried out, and how various dimensions will be evaluated using a qualitative methodology.

The methodology defines the Geographical Areas of Impact for various types of Impacts arising from the proposed development (shown in Table 14-1 within the ES). For the purposes of reference, the Applicant uses two diagrams Figure 14-1 (60-minute drive) and Figure 14-2 (Study Area for Socio-economics and land use effects).

There are broadly, three geographic areas are used by the applicant to consider a cluster of impacts. 7000Acres have labelled each of these areas as follows.

- a. Area 1: For employment and GVA, the Applicant uses the concept of 1 hour drive-time as being the area of reference, making use of local district administrative areas (Bassetlaw and West Lindsey) as sources of census and deprivation data.
- b. Area 2: For “community severance”, public rights of way, local land use and amenity, the “Study Area” is used
- c. Area 3: For agricultural purposes, the impact is considered from a county council (Nottinghamshire & Lincolnshire), through region to national level.

The geographic area for the purposes of considering elements such as population, deprivation, employment and economic activity is too broad and fails to consider the specifics of the local area.

In selecting such a broad area, the Applicant was able to conclude that, in most respects, the study area is broadly similar to the East Midlands and, or England as a whole, such as in relation to education, economic activity, unemployment. In doing so, the Applicant concludes that there is “no effect” on many receptors owing to the development.

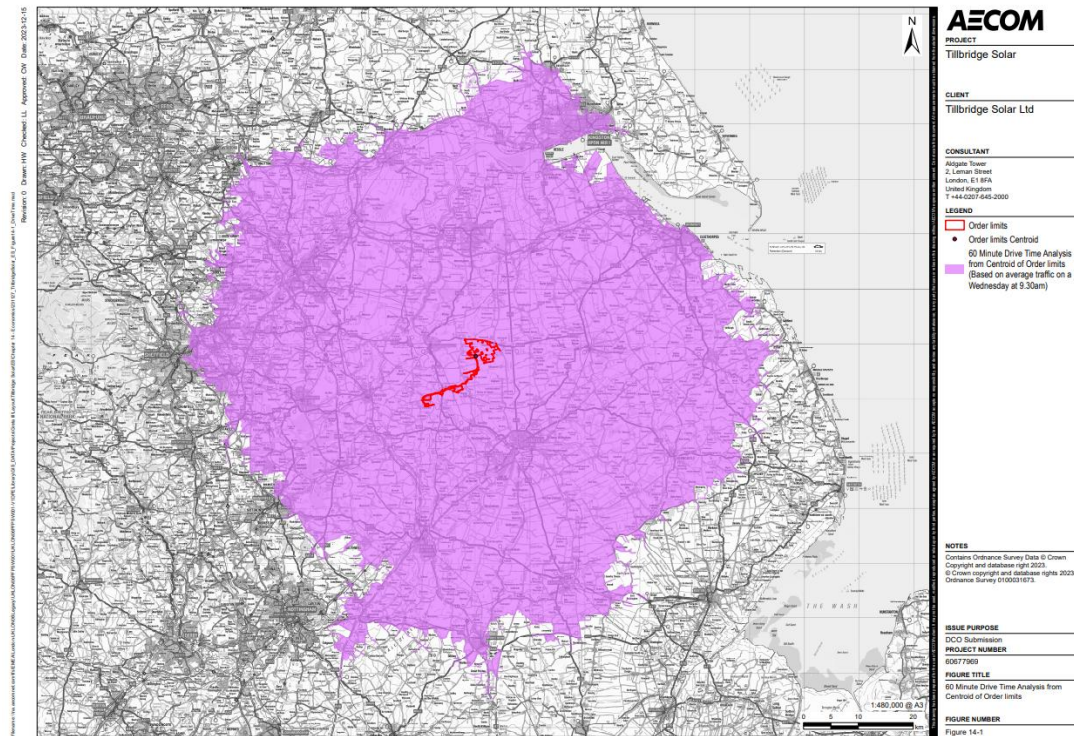
This approach brushes over the very specific circumstances of the local area, in particular the socio-economic difficulties of the nearest town, Gainsborough, less than 8m from the nearest proposed section of Tillbridge Solar. Gainsborough the largest population centre closest to the proposed development, and is not even mentioned in the Environmental Statement, demonstrating the insufficiency of the assessment.

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

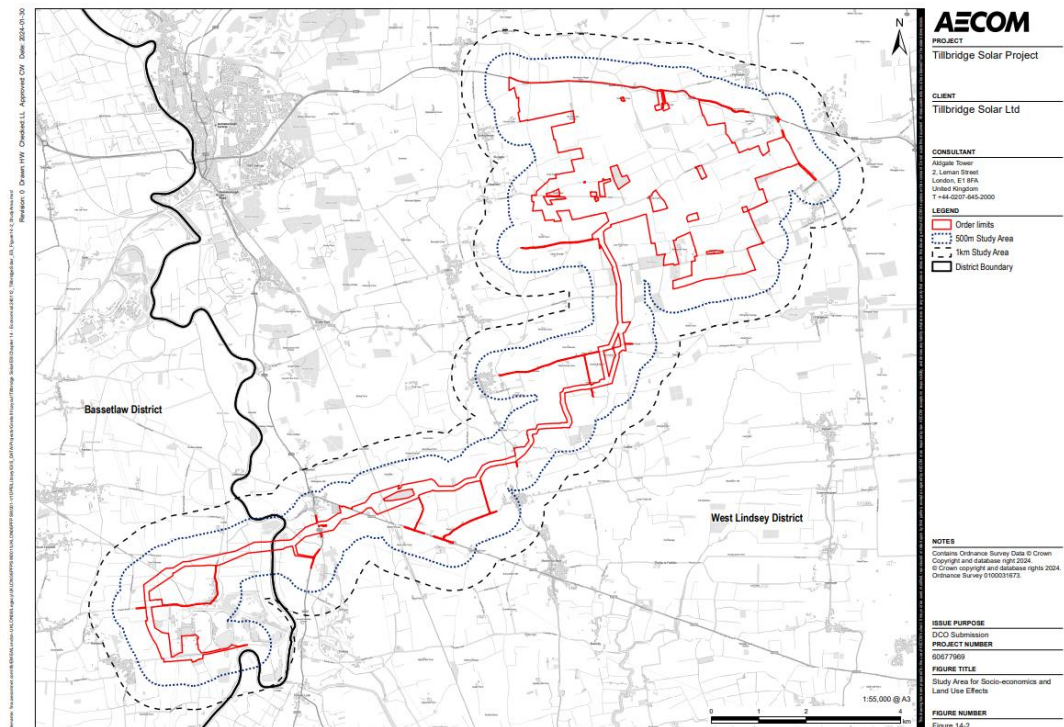
Within the ES, the Applicant describes the fact that within the area being considered for the study, 117,804 people are within Bassetlaw, the district which is least impacted by the proposed scheme, compared to 95,156 people in West Lindsey.

Selection of such a broad area as West Lindsey and Bassetlaw as reference for the study, results in a failure to assess the impact on the areas closest to the development. The document is silent on any impacts on residential properties, despite a number being in extremely close proximity to the proposed scheme. This is effected through the design of the sensitivity methodology, which is set to consider standard deviations difference from the national population.

**Area 1: For employment and GVA, Figure 14-1 within Environmental Statement (60-minute drive)**



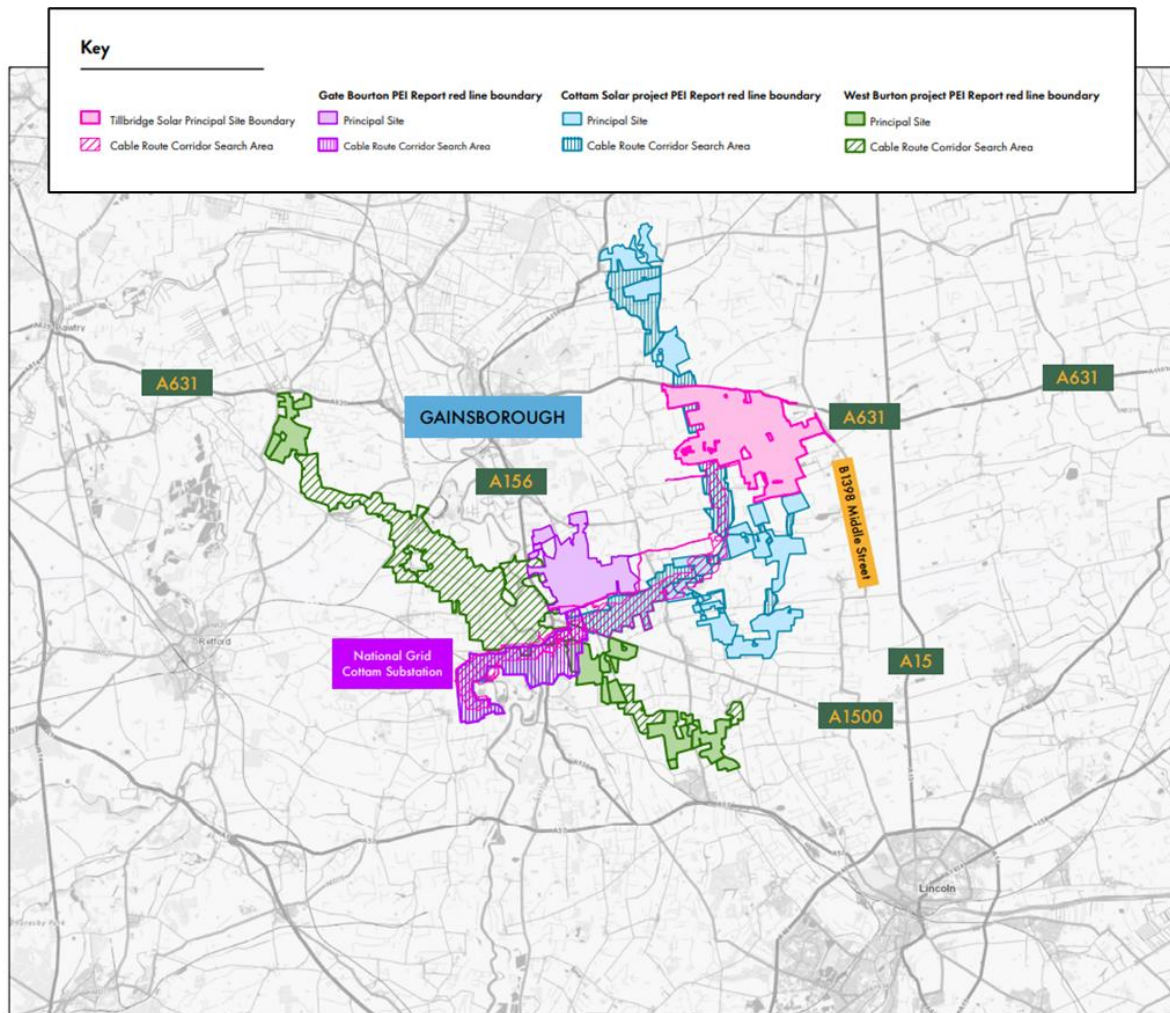
**Area 2: Used for “community severance”, public rights of way, local land use and amenity, Figure 14-2 within Environmental Statement (Study Area for Socio-economics and land use effects).**





By drawing such broad areas, there is little likelihood that such differences would be identified. These sensitivity criteria have then been applied to very specific local amenities and dimensions, changes to which will be felt overwhelmingly by the small populations in the immediate area of the scheme. The size of this population is very small, in comparison to the whole area considered, therefore the assessment of impact on the communities in the immediate area is considerably understated.

The Applicant refers to facilities and features of neighbouring villages, including Glentworth, Hemswell, Harpswell, Heapham and Springthorpe. The Applicant also fails to Neighbourhood Plans of villages, such as for Glentworth or for Hemswell and Harpswell, which consider the details of the communities most effected and the work they have done to consider the aspirations for the future of these villages. Notably, within the Glentworth NP, there is a desire to protect “highly valued features of the natural environment, such as green spaces and the open landscape”<sup>1</sup>, and within the Hemswell and Harpswell NP, Policy 5 addresses this issue directly “Protecting the Wider Landscape Character and Setting of the Neighbourhood Plan Area”<sup>2</sup>.



**Indicative map of cumulative impact, Tillbridge information leaflet (May 2023)<sup>3</sup>**

<sup>1</sup> [Glentworth Neighbourhood Plan \(Approved Plan\) Rev 1.1 \(for publication\).pdf](#)

<sup>2</sup> [Hemswell and Harpswell Neighbourhood Plan](#)

<sup>3</sup> [Tillbridge Solar Consultation Leaflet.pdf](#)



Despite the very localised effects of the scheme on these villages and communities, the Applicant has not carried out any detailed assessment on the socio-economic impacts on these villages, many of which fall within 1-2km of the Order limits, and are dwarfed in comparison to the size of the adjacent developments. By contrast, the area considered in the assessment is around 100km East-West and similar North-South.

No attempt appears to have been made to make use of publicly available information, or to carry out additional research to understand the implications or consequences of development at the scale of Tillbridge on the communities that will be most affected.

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

## 2 Deprivation

Considering GVA per head, the Applicant uses for reference Lincolnshire (£18,816) and Nottinghamshire (£18,816), and notes these are lower than the East Midlands (£21,845) and England (£27,949). The Applicant states that data is not available at local authority level, but further data is available, with the GVA for West Lindsey, the area most impacted by the development being even lower – at £14,971.

Regarding deprivation, the Applicant refers to the 2019 Indices of Multiple Deprivation<sup>4</sup> (IMD), and the Local Authority District areas, West Lindsey and Bassetlaw being 146<sup>th</sup> and 108<sup>th</sup> most deprived areas in England, respectively, of 317 districts.

Despite these observations, the Applicant draws no conclusion and makes no reference to the impact the proposed scheme may have on these aspects of the socio-economic situation.

The Applicant has made only limited use of 2021 Census data, e.g. for basic information such as number of households and age profiles. Within the region, what is also clear is that the 2021 Census shows the proportion of people with “bad” or “very bad” health is higher than the wider regional and national rate.

The Applicant has superficially considered available socio-economic data at the next level of resolution, the Lower Layer Super Output Areas (LSOA's). Each LSOA has an average population of around 1500, and the cluster of 10 LSOA's in Gainsborough represent the largest population in the area. 4 LSOA areas within Gainsborough are within the top 10% most deprived areas in England. One of these areas is ranked the 24<sup>th</sup> most deprived area of the 32,844 LSOA's in England. In addition, although 4 are within the 10% most deprived areas, two more of the 10 Gainsborough LSOA's are only just outside this, within the 11<sup>th</sup> percentile. The Lincolnshire Industrial Strategy states that Gainsborough has low levels of employment (lowest 4% in England) and living standards (lowest 2% in England). For the study to have “missed” the significant socio-economic challenges of the region and the primary population centre closest to the development is a shortfall in the assessment.

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

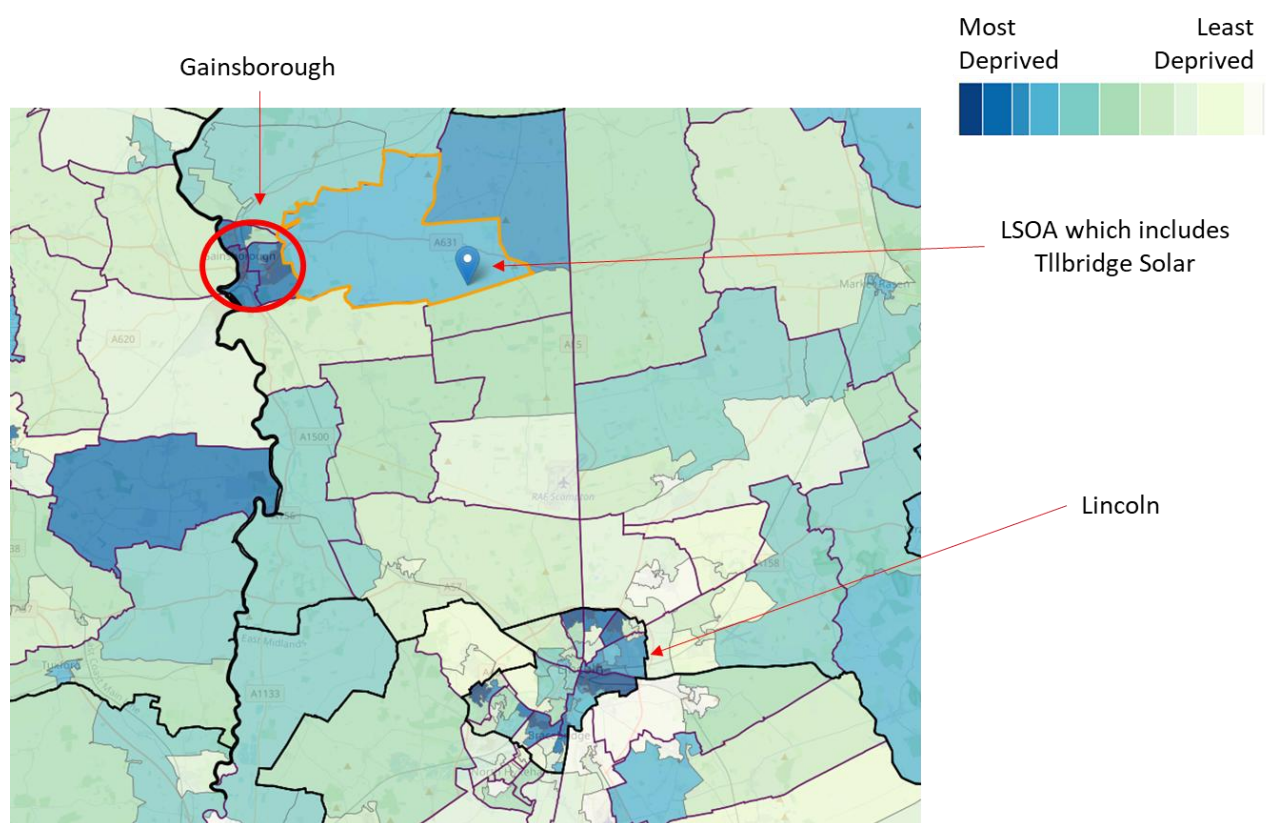
The IMD (annotated screenshot below) covers several dimensions of deprivation, including Income, Employment, Education Skills & Training, Health & Disability, Crime, Housing, Living Environment, Income affecting children, Income affecting older people. Of these dimensions, the only dimension that is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

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

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<sup>4</sup> [Indices of Deprivation 2015 and 2019](#)

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



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

### 3 Employment

The Applicant has used the broad areas of the 60-minute drive study area and the East Midlands as the area for considering employment. In conducting its assessment, the Applicant applies the methodology sourced from the Homes & Communities Agency Additionality Guide<sup>5</sup>, using technical factors such as leakage, multipliers and displacement to calculate the net employment during the operation of the scheme.

The Applicant estimates that 10 jobs would be lost because of ceasing agricultural activities, without offering any further explanation. It is therefore not possible to assess the basis upon which the loss of agricultural jobs has been calculated. It is not clear whether this includes any “indirect or induced employment”, which has been included when considering employment created by the proposed scheme. There is no information on the types of role lost, any levels of variable work arising from the seasonal nature of farming, the skills the roles require or the financial contribution they may make.

Equally, there are no details about the nature of the new roles, particularly during the operational phase, other than the indication of “leakage”, i.e. the extent to which employment benefits leak from outside the area being considered. The Applicant considers the potential for 10 new jobs arising from the proposed scheme. It is not clear to what extent new roles are within the immediate area of the development or are further afield.

It is likely that there will be a spread of roles, ranging from security and grounds maintenance, through to technical specialist roles and financial roles overseeing the management and settlement of the scheme. It would be reasonable to assume that the rates of pay will start at the lower end, with security and grounds maintenance, and therefore these roles are most likely to be sourced locally – as it is less feasible for people on low pay to travel from the outer reaches of the 60 minute drive study area to access these jobs. There is insufficient detail within the ES to make an assessment, but such roles are unlikely to sustain families or provide rewarding jobs with potential for progression, growth, and development.

Roles that demand specialist engineering and financial skills may not need to be full time in the on the project and given the deprivation rates regarding skills and education in the region, these roles are therefore more likely to be those subject to “leakage”. By contrast, within the region, Farming is very much considered a way of life and a rewarding, although challenging, vocation, that has sustained families for generations. The ES does not consider the weighted impact of the type of jobs lost and gained by the creation of the development. The ES treats all roles the same and is deficient in this regard. Typically, workers in such industries are local to the land, and are unlikely to be represented by the average 60-minute drive time study area. (For instance, the average distances driven by residents of Glentworth is relatively local, as indicated in their Neighbourhood Plan).

The ES has potentially failed to adequately assess the nature of roles lost and gained. Given the leakage consideration, the scheme is far more likely to provide lower skilled, lower paid jobs more locally, than the higher skilled roles, and at the cost of losing rewarding jobs that provide a livelihood in farming. There is little or no community benefit through employment from the development, in an area that is in desperate need of jobs and prospects, furthermore, there is no guarantee these jobs will return at the end of decommissioning. The loss of farming livelihoods therefore can only be seen as an erosion of opportunity.

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<sup>5</sup> [HCA Policy Covers](#)

## 4 Local Amenity

The Tillbridge ES describes the physical location of local amenity but fails to recognise the local value through the structure of their chosen methodology, which considers sensitivity from a national perspective for PROW's when assessing loss of local amenity. By contrast, within the West Burton ES<sup>6</sup>, the Applicant notes that *"the Scheme and its near surroundings host a number of Public Rights of Way, which form important local recreational walking and cycling routes between villages in the immediate vicinity"*, and that these are *"important to the local population for personal health and wellbeing, and for local amenity"*.

The ES fails to acknowledge the character, features and public rights of way which are a point of attraction for residents of and visitors to the region. The ES for socio-economics also provides an extremely limited treatment of any impacts on tourism, referencing Chapter 12 of the ES for any implications arising from Landscape and Visual Amenity impacts, although the chapter fails to mention tourism at all.

The assessment of impacts considers Public Rights of Way, typically concluding the outcome to be "negligible (not significant)" during construction and decommissioning, and staggeringly, even finding the impact to be "minor beneficial" owing to the inclusion of two new permissive pathways, failing to acknowledge the loss of amenity arising from having constructed a solar city on the landscape. The ES fails to acknowledge the importance of PROW's for amenity, and in practice, that it is frequently the minor roads that serve as the amenity for walking, cycling and horse-riding. The impact of 3.5m to 4.5m high panels in proximity to the use of minor roads in this regard does not appear to have been considered in the ES.

As has already been described above, the 2021 Census data shows the proportion of people within the LIA who regard themselves as having "bad" or "very bad" health is already above the national average. By adversely affecting local amenity, the scheme would therefore exacerbate the existing health and wellbeing issues faced by the region.

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

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

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<sup>6</sup> [EN010132-000369-WB6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation.pdf](#)

## 5 Land Use

Notably, within recently withdrawn version of NPS EN-1<sup>7</sup>, which was in force for much of the development of the Tillbridge project (until January this year), solar was not envisaged to be a form of large-scale generation. The chapters on Renewable Electricity Generation stated that “Future large-scale renewable energy generation is likely to come from the following sources”, and listed Onshore and Offshore Wind, Biomass, Energy From Waste, Wave and Tidal. Solar was not included in the list. In fact, solar was only mentioned once within NPS EN-1, to highlight the issue that certain renewable sources *“are intermittent and cannot be adjusted to meet demand”*.

With regard to land use, the previous NPS EN-1 (5.10.8) required that Applicants *“should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations”*. It is clear that the Applicant has never considered the wider implications of uncontrolled, extensive land use for solar putting additional pressure on land use, which must meet other decarbonisation and sustainability demands, such as food security, direct decarbonisation measures or growing biofuels.

Within the previous NPS EN-3<sup>8</sup>, National Policy Statement for Renewable Energy Infrastructure, solar was not mentioned in 82 pages of guidance, whereas, onshore wind, offshore wind, biomass, waste combustion, wave and tidal are all covered.

Within the 2024 NPS EN-3<sup>9</sup>, covering renewable energy, solar is now included, although this describes “a typical 50MW solar farm”, not development at the scale of Tillbridge. In addition, there is a clearly implied hierarchy in the list of land that should be used for ground-mounted solar. Section 2.10.29 states: *“applicants should, where possible, utilise previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of “Best and Most Versatile” agricultural land where possible.”*

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

NPS EN-1<sup>10</sup> also includes *“The functionality of an object - be it a building or other type of infrastructure - including fitness for purpose and sustainability, is equally important”* (4.7.1).

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

The land use assessment by the Applicant is entirely focused on the amount of agricultural land affected and Agricultural Land Classifications (ALC) of the land, making the argument that only a small proportion of agricultural employment will be impacted, on a temporary basis (although an

<sup>7</sup> [1938-overarching-nps-for-energy-en1-withdrawn.pdf](#)

<sup>8</sup> [1940-nps-renewable-energy-en3-withdrawn.pdf](#)

<sup>9</sup> [National Policy Statement for renewable energy infrastructure \(EN-3\)](#)

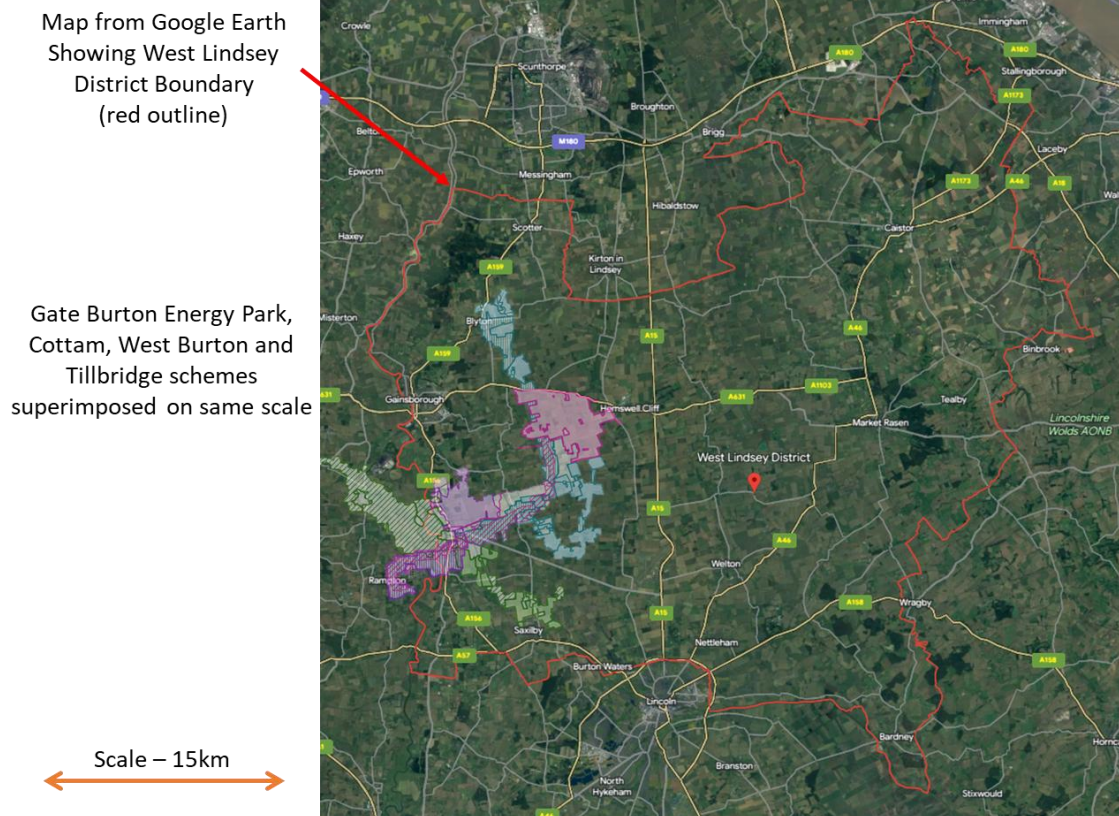
<sup>10</sup> [EN-1 Overarching National Policy Statement for Energy](#)



operational life of 40 years can hardly be considered to be temporary), and only a small fraction of that will be considered Best and Most Versatile (BMV). An application to consume land on such a massive scale requires thorough assessment and broad consideration of land use alternatives. The evidence base produced by the Applicant is severely limited in this respect.

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

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



Notably, the ES appears to have limited any assessment of impacts on agriculture to the construction and decommissioning periods, as being “minor adverse (not significant)”. The ES does not appear to have considered any impact on agriculture during the operational phase – despite elsewhere acknowledging the loss of agricultural jobs.

In addition, the treatment by the ES omits any consideration of efficiency of land use, nor does the ES consider the additional demands on agricultural land for planting trees, establishing peatlands and



growing energy crops for biofuels, as identified by the UK Climate Change Committee in its 6<sup>th</sup> Carbon Budget<sup>11</sup>.

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

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

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<sup>11</sup> [Sixth Carbon Budget - Climate Change Committee](#)

## 6 Consideration of Local Plans

A significant amount of work has been carried out in the region to develop plans for the future of the region, notably the Central Lincolnshire Local Plan<sup>12</sup> (CLLP) (April 2023) and the Local Industrial Strategy<sup>13</sup> (LIS) (2021). Both documents are extremely conscious of climate change and actions to decarbonise the economy, however neither makes any proposals for the development of large-scale ground mounted solar as a contribution to the development or decarbonisation of the region.

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

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

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

Regarding the Visitor Economy, the aspiration is to “*develop the tourism sector levelling up and supporting some of the more deprived parts of the region by providing higher-quality and more reliable employment for workers*”. Within the ES, the Applicant had completely overlooked the contribution West Lindsey made to the visitor economy. Despite the assertions by the Applicant that there will be no adverse impacts during construction and decommissioning, or that the frankly absurd conclusion there may be any net beneficial impact on PROW’s during the operational phase, any truly objective consideration would conclude that the large-scale development of ground mounted solar will only erode the attractiveness of environment and landscape.

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

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

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

<sup>12</sup> [Local Plan for adoption Approved by Committee.pdf](#)

<sup>13</sup> [GLLEP Local Industrial Strategy \(2021\).pdf](#)

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

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

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

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