

**7000 Acres**

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

**Statement of Reasons**

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

**Statement of Reasons:**

Within the Statement of Reasons (EN010142/APP/4.1) the Applicant has reported at 5.3.4 that the Applicant has reached agreement with six freehold owners of the Principal Site. However this does not reflect the businesses status within the Principal Site.

In Chapter 15: Soils and Agriculture of the Environmental Statement (EN010142/APP/6.1) it is reported at 15.3.8 that there are 12 agricultural occupants. At 15.4.15 it is reported that information on the size and nature of nine of these farm businesses has been obtained from the occupants, and of these interviews have been conducted for 5 farm businesses.

In Chapter 14: Socio-Economics and Land Use of the Environmental Statement (EN010142/APP/6.1) it is reported at 14.3.6 that existing employment is currently estimated at 10 jobs engaged in agricultural activities, which has been adopted as the assumption for the assessment.

Apart from these references there seems to be a minimal description of the impact to the businesses within the Principal Site. Why has there only been 5 interviews in the last 2 years with these people, as the initial engagement was reported by the applicant in their Statement of Community Consultation, Published Thursday 25 May 2023, to be in the Summer of 2022?

Why have they estimated the number of current jobs in the businesses within the Principal Site? Surely they could find out the actual details from conversations with the 12 existing businesses. Or is this because they only expect to achieve Option Agreements with the six freehold owners that have currently signed up (27% of the principal site acreage) and the rest will be achieved through Compulsory Purchase Orders?

Within the LCC Agenda Document for Planning and Regulation Committee, 04/11/2024 Local Impact Report they note at 13.13 Regarding farmsteads assessed in the ES, only seven farmsteads are listed namely: Harpswell Low Farm, Harpswell Grange, Hermitage Low Farm, Billyards Farm (Low Farm), Manor Farm Heapham, Heapham Cliff, Grange Farm (Heapham Grange). There is obviously some confusion as to who the 12 businesses are that the applicant is quoting.

Within the WLDC LIR they quote at 11. Soils and Agriculture Summary

- [AG3] The assessment of the effects on farming circumstances is unsatisfactory as there is insufficient baseline information for a detailed assessment to be made and an established methodology has not been used.
- [AG4] It is not clear why information from 12 farm businesses affected by the Scheme have not been included in the assessment.

They further comment at:-

11.12. The farming circumstances assessment has been based on information obtained from nine farm businesses operating within the Principal Site, including interviews from five farms. Twelve farm businesses are affected by the Scheme and the boundaries of these will extend beyond the actual Scheme boundary. It is not clear why these additional farms have not been included within the assessment area and whether the assessment has considered areas outside of the site boundary.

Additional farm businesses will also occupy land crossed by the Cable Route Corridor which have not been assessed.

11.18. The assessment of farming circumstances is less satisfactory. The farming circumstances assessment is based on farm interviews and reports on the types of land use of each farm. Twelve farm businesses currently occupy the Principal Site. Information on the size and nature of nine of these farm businesses has been obtained from the occupants, and of these, interviews have been conducted for five farm businesses. Therefore, the farm assessments are incomplete, but no explanation is given for this. Additional farm businesses will also occupy land crossed by the Cable Route Corridor which have not been assessed. For a Scheme of this nature, the EIA should contain a description of the size, nature and occupancy (whether owned or tenanted) of each farm enterprise. No information is provided on farm size and the description of land use is not sufficiently detailed. For example paragraph 15.6.13 just states: 'Land is predominantly in standard arable rotations of cereals and break crops, with some energy crops grown for Anaerobic Digester substrate and bio-ethanol production'.

11.19. The farming circumstances assessment is mainly based on personal judgement without a proper supporting farm impact assessment. For example, paragraph 15.8.22 states: 'This diversified enterprise may also enable managers of farm businesses that are currently too small to be economically viable, to wind up the farm business'. Small agricultural businesses are not necessarily unviable; it depends on the nature of the enterprise and personal circumstances of the occupier.

11.20. Without a map of individual farm boundaries and a breakdown of size, occupancy and land use, it is not possible to verify the basis for the assessments of significance, magnitude of change and residual effect. No real evidence is provided to support the conclusions of the farming circumstances assessment, apart from the judgement of the assessor, which states that: 'No significant residual effects are anticipated to occur during construction, operation or decommissioning of the Scheme'.

Considering that 7000 acres, LCC and WLDC all have concerns regarding the farming circumstances and their details we recommend that the ExA requests the Applicant to produce a detailed account of each of the current businesses that are located within the Principal Site. The information for each business should contain as a minimum:- The Business Name, the farm, the plot numbers that relate to it, the acreage it owns within the Principal Site, the total acreage that it owns and/or manages, the number of current employees, the number of employees that will be let go if the project proceeds, the current crops – type and quantity, the current status of negotiations.