

Mallard Pass Solar Farm

Final Summary

Submitted by: Helen L Woolley BSc (Hons) and Geoffrey W Woolley

Unique Reference nos. Helen Woolley MPSP-AFP156 Geoff Woolley MPSP-AFP155

Introduction

Since the application for the Mallard Pass Solar Farm was announced I have been fully engaged throughout the consultation phases and the more recent the examination in public of the proposed scheme.

Never, in either my professional career within the land based sector or as a private citizen have I felt so strongly opposed to any local or national issue to be compelled or motivated to campaign against a development – this is not nimbyism but a real and deep concern that the output of renewable energy generated by this proposed scheme cannot be justified in this location for the reasons the Mallard Pass Action Group, I and the many other residents have set out throughout this examination.

As a member of Mallard Pass Action Group I have contributed to the evidence submitted by the group in response to the application and spoken on behalf of the group as well as personally during the issue specific hearings. Whilst I will make occasional reference to the MPAG in this Summary I have consciously made the decision not repeat to much of the content of the MPAG Summary however I would ask the Examiner to note that the views and opinions expressed in the MPAG submissions are reflective of my personal views of this scheme.

Background

As a graduate in Agricultural Science and having a varied career in the land based sector that spanned 4 decades I have an understanding of a wide range of policy areas which affect the farming, land-owning and rural sector and this has I believe enabled me to comment on this application objectively even though we are directly adversely affected by the proposed scheme due to our close proximity to proposed development.

The Proposed Mallard Pass Solar Scheme

As a natural Scientist whose working and personal life is inextricably linked with the natural environment I recognise the need to address and mitigate the impacts of climate change, to reduce our dependence on fossil fuels and reduce our carbon footprint.

I acknowledge that solar panels have a part to play in addressing this when sited on roof tops, where appropriate on brownfield, previously developed and contaminated land and also in some of the many innovative ways solar technology has been deployed in the UK and many other countries.

However, I do not believe that the applicant has made a compelling case as evidenced by the various submissions made by Mallard Pass Action Group during this process.

Therefore overall I cannot support the development of this proposed large utility-scale ground mounted solar PV scheme which:

- does not fully comply with current relevant government policy
- takes significant productive agricultural land, with a high percentage of BMV, out of production for 60yrs thus reducing the options for future generations to develop land use policy appropriate for the time.

- dominates and dramatically changes the rural landscape in which it is sited
- will have significant impact on both residential and recreational amenity
- will not make a meaningful contribution to the governments net zero targets
- will destroy much of what is valued by and provide no meaningful benefits for the communities living in and around the area in which such a scheme is located.
- And due to the above have a significantly adverse impact on individuals and the local communities in the area it is sited.

Site selection and Scale

It is clear from all the information provided by the applicant and by their own admission in webinars during the statutory consultation phase the primary driver for the choice of site location is the proximity to the Ryhall electricity sub-station and an unused grid connection.

The grid connection available is sub-optimal as demonstrated by MPAG in its submissions with the availability of a grid connection being only one consideration in site selection.

The size of the scheme is unprecedented meaning there is no real experience of the true impacts of such a large scheme located in a rural area in close proximity to so many villages and many more isolated dwellings. The land take is significantly higher than the majority of other NSIP applications currently in the planning system, this must raise the question of the suitability of site selection for the reasons below:

- it is entirely on greenfield land, in this case high quality, productive agricultural land which includes significant BMV land (at least 41% with evidence suggesting this is a minimum and it could be higher), this is a finite resource and diminishing resource (Defra Food Security Report 2021), and would seem contrary to the guidance of draft NPS EN-3 2023 and does not take into account relevant elements of Defra's Food Security Report.
- that the whole site covers 852 ha yet the solar area which will actually generate electricity is to be approximately 426ha with the remaining half being used for mitigation must raise questions on the suitability of the site.

Landscape and Visual impact

The Independent report commissioned and submitted by the MPAG presents a comprehensive report with clear conclusions as to the Landscape and Visual impact of this scheme. In the Executive Summary para 1.7 the author comments that **"the proposed development would give rise to significant adverse effects on the landscape character of both the site and the wider landscapes, and almost certainly, on views at viewpoints lying several kilometres from the site. It would also significantly adversely affect people's health and wellbeing, and the quality of their lives.** Given the independent report provides a very comprehensive and impartial assessment of the Landscape and Visual Impact of this report I do not propose to make further extensive comments on the overall Landscape and Visual impact but will comment in this summary on the impact on our recreational and residential and amenity.

Recreational Amenity

PRoW

I walk everyday along the many PRoW in the area often walking directly from home. Walking through an industrialised landscape with fencing, CCTV and the noise generated by the installation most certainly does not offer the same experience as I currently enjoy walking along the local roads and PRoW.

That the Applicant believes, offering new permissive RoW should be considered a benefit and that because, existing PRoW will remain accessible, overlooks that PRoW will be blighted by the industrialisation of the landscape and so completely misunderstands how I and others value our recreation amenity. If this scheme goes ahead, to have the experience I currently enjoy, will require a car journey of several miles, to escape the industrial landscape created, when heading off for my daily walks.

Residential Amenity

We appreciated the visits made by the Examiners appointed to examine this scheme and in particular the visits to individual sensitive receptors. This has given the Examiners the opportunity to see how impactful the scheme will be for those of us living in close proximity to the scheme and, in our case on the boundary of the DCO.

As I stressed in my Written Representations the Applicants Landscape and Visual report, table 17-1 in Chapter 17 describes the Operational effects to Kesteven Uplands (the area we live) within the order limits which in year 1 and 15 are described as:

*Significance of Potential: Major Adverse yr1 and Major-moderate adverse yr 15
Significant*

After mitigation they are still described as:

*Significance of residual Effect: Major Adverse Significant yr1 Major-moderate
adverse significant (year 15)*

This demonstrates that the topography of the site is such that despite mitigation the impact of scheme remain adverse.

In appendix 6.4 Table 1. Of the same document the potential visual effect of the proposed scheme on our property is described as *The Solar PV Site would be located approximately 185m to the west of the property within Field 4. The existing hedgerow along the B1176 and internal field hedgerow further west would be retained and manged to provide enhanced screening. Views from upper storeys of the house would be possible are likely to be limited. Glimpses of PV Arrays in Field 4 maybe possible but middle distance views south would remain.*

To summarise my comments made in my WR:

The distance of 185m to the Solar PV arrays in field 4 agrees with my measurements and we consider that the close proximity of PV arrays to our dwelling is entirely unreasonable and their impact adversely significant for the whole life of the scheme.

The proximity of the secondary compound a similar distance away adds further to the adverse impact caused to us as residents and also to our neighbours, with 4 properties, in close proximity to this area of the site.

I strongly dispute the wording: '*Views from upper storeys of the house would be possible are likely to be limited. Glimpses of PV Arrays in Field 4 maybe possible*'

During their visit the Examiners and the Applicant were given the opportunity to view the area from the upper floor windows and I hope all will agree with my strongly held view that due to topography the solar arrays in field 4 will be always be visible throughout the life of the proposed scheme from upper floor rooms and from lower floor rooms, solar arrays will be visible when hedges are not in full leaf.

Our property is also identified as being susceptible to Glint and Glare particularly the upper floor west facing rooms – identified as moderate, not expected to be significant but as one of the these 2 rooms is used as an office/craft room during the day I asked through my written representations that this be taken into account – I did raise this concern during the relevant ISH and in my follow up summary but I would like to flag again in this submission.

Secondary Compounds and the need for Fields 1 & 4

During the CAH in September I asked for more information and clarification to justify the need for 3 secondary construction compounds all accessed off the B1176 and within less than circa 700m of each other. In particular it is the need to create these secondary compounds particularly the one on Barbers Hill which is creating much of the need for temporary possession powers and resulting in the huge disruption to residents and road users. Asking if this is proportionate and justified. I have not been able to find any written justification from the applicant to fully address this question.

In addition to the impact on residential amenity of the PV panels in field 4 set out earlier the proposed location of a secondary compound more or less directly opposite our property will further adversely affect our residential amenity during the construction phase.

Given the adverse impact on residential amenity of the 4 properties in the vicinity of Fields 1 and 4, the need for temporary possession powers, the extensive roadworks required, the proximity of the Little Warren SSSI, if the Examiner is minded to recommend approval of the scheme, I would respectfully ask him and the Applicant to consider if siting PV panels in field 1 and field 4, each small areas of solar arrays, are appropriate at all given the huge disruption that will be caused too many road users and sensitive receptors.

Noise and disturbance

As I have explained our home is a quiet tranquil place to live. We have a major concern that this will change – from construction of particular concern is piling noise and during operation, noise from both the tracker panels, should they be used, and inverters.

We are both largely retired and so at home for a significant amount of time. Any work we now do whether paid or voluntary is home-based. Given the quietness we currently enjoy any noise will be intrusive.

The noise studies undertaken by the applicant seem to be desk based. When challenged on noise and its impact on health and well-being the applicant has commented that all noise levels are within the legal limits.

Whilst that maybe so, surely on-site survey work should have been completed in proximity to sensitive receptors across the site to measure actual noise levels and to use this information to judge the noise impact of the proposed scheme. It is the relative change in noise levels which is important not whether the noise levels anticipated are within the legal limit.

Throughout the examination noise levels have been raised as a concern and no evidence has been provided to reassure. In our location we can hear music and see & hear fireworks from Burghley Park some 5-6 miles away. The piling noise during construction across the site is a major concern with evidence of noise from other schemes being submitted during the examination phase.

Proceedure

The Applicant has used the Rochdale principle in making the application and whilst there are outline plans for various sections of the scheme there is much detail still to be agreed. Given, that should the application be approved by the Secretary of State, much of the responsibility to scrutinise and approve the detail of the scheme will fall to the LPAs as a resident I would ask that proper provision is made through the planning system to ensure that the respective LPAs involved in this process have/ are granted sufficient resources, both expertise and funding to take on this huge task.

In addition, if the scheme is approved I would ask if there is anyway through the planning system that a provision can be made to ensure that when the scheme is decommissioned the funding is available to ensure this happens within the provisions of the consent order even though we are looking many decades ahead.

Conclusion

At the beginning of this document I set out in summary my overall reasons for objecting to the Mallard Pass Solar Farm.

During the ISH the in-combination effects were considered and it is these which as an affected person make the proposed scheme really intolerable for us.

Through-out the examination phase I have been left with the perception that the Applicant hasn't truly considered the full impact of in-combination effects of:

- Blighted properties
- The various Compulsory Acquisition powers sought
- Proximity and visibility of solar arrays to residential properties
- Proximity of sub-station, primary & secondary compounds to residential properties
- Increased noise throughout the life of the scheme but particularly during construction
- Glint & Glare with no mitigation where properties are identified as moderately affected
- Huge disruption due to road closures, traffic measures, impractical diversions routes, significant increases in traffic volume

- Dramatic changes to the landscape from a rural landscape to an industrial landscape for a scheme which is sub-optimal
- Loss of recreation and residential amenity
- No perceived community benefit

the list goes on....

Each seem to have been assessed separately to varying levels of detail. Many of the assessments rely on desk-based studies with all impacts claimed to be within legal limits which means they are deemed acceptable. How reliable is this information – what happens if these assessments are found to be inaccurate and the true impacts under-estimated?

Whilst any one of these would be bad enough, for us and many others it is the in-combination effect of some or all (in our case all) of the issues listed above which creates the truly adverse effects of the scheme on our sense of place and long-term health and wellbeing.

It is hard to put into words the emotions I feel now as the Examination phase comes to an end and we await the decision of the Secretary of State. A feeling of relief that this part of the process has concluded but with a massive black storm cloud overhead, as we live with continued uncertainty as the owners of a blighted property, dreading the noise and disruption inflicted on us if the scheme is built and the resulting huge sense of loss and grief as we face the future living in a semi-industrial landscape rather than the deeply rural landscape in which we chose to live. This is and will continue to take its toll on the health and well-being of those living in this beautiful corner of England.