Application by Mallard Pass Solar Farm Limited for an Order Granting Development Consent for the Mallard Pass Solar Project

J A B Gresty – Resident within the development area Interested Party Representation - 30 May 2023

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Notes -

Field numbers referred to are the numbers used by the applicant in Drawing No 7863_SK_604 REV: PO

Public Rights of Way references are those used by the applicant in

Drawing No: 7863 111 REV: PO

Achieving sustainable development is at the core of the planning system.

The National Planning Policy Framework (the Framework) states that:

"Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."

National Policy Statement for Energy EN1 (EN1) states that:

"..... Applying "good design" to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area."

The proposed development fails to meet the requirements of good design on numerous grounds and, accordingly does not represent sustainable development. Therefore, I urge the Inspectorate not to allow the development as proposed.

I outline some principle reasons for my objection to the proposed development in its current form below:

1. Scale -

- 1.1 The proposed development stretches in a more or less continuous block for about 4.5 miles. As such, the development would engulf villages like Ryhall, Belmesthorpe and Essendine as well as the scattered more isolated dwellings situated throughout the development area, such as the house at Ryhall heath and Barbers Hill at the north-west end of the site.
- 1.2 The massing of large areas together with little farmland in between, would result in a "monoculture" of solar arrays which would serve to add to the visual scale of the development.
- **1.3** The height of the proposed solar arrays is some 3.3 metres. This is significantly taller than most solar arrays installed in the UK to date. Again, this would contribute to the prominence of the development in the landscape.

2. Landscape -

2.1 Although not uniformly so, the topography of the area is characterised by gently rolling hills with open valleys and, in places, flat limestone plateaus. The development site spans two local planning authority areas, Rutland and South Kesteven. Whilst the authorities give the areas different names, their descriptions of the landscape characteristics are broadly similar.

2.2 The Rutland Landscape Character Assessment 2003 describes the area as

The Clay Woodlands

- 1.23 The central area of the Clay Woodlands is a transitional area between the settled estate woodlands to the north and west, and the more open, modern unsettled claylands to the east and south. Numerous outlying farms lie within the central area, such as Grange Farm, Ryhall Heath Farm, Walk Farm, Frith Farm and Taylors Farm. These lie on or close to quiet roads and tracks some of which are former drove roads used by farmers to move stock to market.
- 1.24 Remnant dry stone walls made of local limestone are characteristic features in some parts of the clay woodlands, probably originating from one of the many small quarries around Clipsham.
- 1.25 The settlements in the Clay Woodlands sub-area are Clipsham, Essendine, Pickworth and Stretton.

Recommended Landscape Objectives Rutland Plateau - Clay Woodlands:

To conserve and enhance the large-scale, gently undulating, agricultural landscapes with substantial woodlands and avenues, to enhance the sustainable management of existing woodlands and to create new woodlands in the less wooded parts around the Gwash Valley,

especially where they would create skyline features. To improve the edges of the settlements and integrate large structures and modern buildings into the landscape where necessary. To protect historic features such as earthworks and restore characteristic drystone walls.

2.3 The South Kesteven Landscape Character Assessment - January 2007, (SKLCA) describes the area as being part of the Kesteven Uplands.

The physical and human characteristics combine to create a distinctive and mostly unified and consistent landscape character. This is a mostly harmonious rural landscape, with farmland, woodland and parkland with small stone-built villages. Where the undulations are

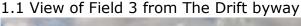
more pronounced, with small woodlands and fields, it is a relatively small-scale intimate landscape. The higher land tends to be more open with bigger fields and woodland blocks creating a larger scale yet simple rural landscape.

Whilst these are historic assessments, the landscape and character of the area has not changed significantly since 2003 and it is reasonable to consider that the aims of conserving and enhancing the gently undulating agricultural landscape identified by Rutland and South Kesteven should be preserved. The proposed development would not do this.

Further, it should be noted that 4.30 of the SKLCA identifies the area as being particularly sensitive to wind energy proposals is also likely to be medium to high to (for?) large scale proposals. Proposals are likely to be difficult to accommodate in this medium-scale landscape with its high proportion of valuable landscape elements. Whilst this is not a wind energy proposal, it is

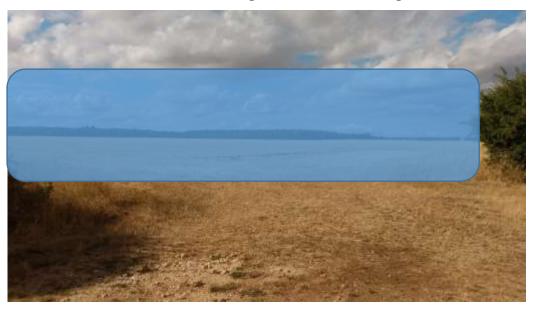
large scale, and the it serves to illustrate the vulnerability of the landscape of the area to large scale development, such as that proposed.

- 2.4 One particular characteristic of the landscape in and around the development area is the patchwork of fields which create a mosaic of different textures, sizes, shapes and colours in the landscape. The proposed development would result in mono-culture of stark, industrial and utilitarian landscape. As such it would fail to maintain the rural nature of the landscape.
- 2.5 The proposed development would dominate the landscape in and around the development area. Because of the generally undulating topography, the solar arrays would be open to both close and distinct public view. Consequently, the stark and industrial character and appearance of the proposed development would detract from the rural character and appearance of the wider area and a largely unbroken sea of hard, stark industrial equipment in the landscape.
- 2.6 The siting of this large scale development in the rolling landscape, and the harm it would do to the character and appearance of the development site and surrounding area, would fail to meet the aims of good design sought by EN-1 and EN-3.
- 2.7 Some examples of views from public space





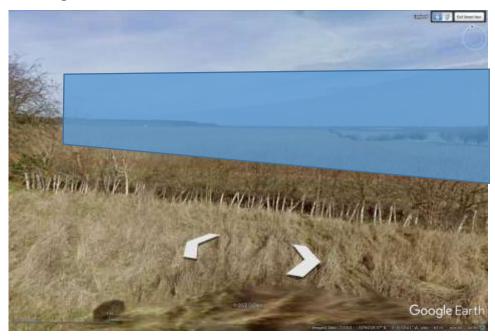
1.2 View of Field 3 with 3.3 m high structure blocking view



2.1 View of Field 3 from The Drift



$2.2\ \text{View}$ of Field 3 from The Drift byway with $3.3\ \text{m}$ high structure blocking view



3.1 View of Fields 9, 10, 13 & 16 from road



3.2 View of Fields 9, 10, 13 & 16 from road with effect of solar arrays



4.1 View from road of fields 5 & 7 with effect of solar arrays



5.1 View from crossroads on B1176 of fields 5, 7 & 16 (red in distance) with effect of solar arrays



2.8 Landscape Planting & Screening -

Little attention appears to have been paid to the appearance of the proposed development in the landscape. For example, landscape screening planting is proposed along either side of the B1176. The roadside hedgerows on this road are reasonable but do very little to restrict views into the land when not in leaf.

This pattern of inadequate planting of belts of trees and hedgerows to limit the stark and industrial appearance of the development in the landscape is repeated throughout the site. Whilst shelterbelt and thick hedgerow planting would have limited effect on the wider views of the development in the landscape as a whole, it could help to mitigate some of the more immediate effects when viewed from nearby.

If the Inspector is minded to approve this development, it should be subject to condition of a fully approved landscaping plan being provided and approved before the start of any works.

3. Public Access & Recreation -

The proposed development site is crossed by several, well used public rights of way (PROW).

E123 – the Pickworth Drift byway open to all traffic (BOAT) – This is very well used PROW, popular with walkers, cyclists and horse riders. It forms a valuable and well used link from paths close to Stamford and Ryhall to the network of paths and bridleways around Pickworth Wood and Clipsham.

It is very rural and tranquil, which gives users a good opportunity to experience the countryside and wildlife in a way largely undisturbed by road noise.

The solar arrays in Field 3 would be close and visible from the track. The stark and prominent views of the development from the track would detract significantly from the visual amenity of the track and the character of the track as a whole.

The Drift, Ryhall Heath – this is a section of single track road which leads from the B1176 to the Pickworth Drift BOAT. It is extremely popular with walkers, providing a safe and easily accessible place to walk in the countryside.

As well as an army of regular dog walkers, it is used by the elderly and the less able who feel unable or unconfident in walking on unmetalled paths. It is one of the very few places in the open countryside in the Stamford area which is suitable for wheelchair and mobility aid use.

The development of Field 2 would be very prominent when viewed from the road and would detract significantly from the amenity of The Drift.

Further, the proposed use of the existing field entrance at the T junction with the B1176 as the development entrance into Fields 1, 2 & 3 2 would conflict both the highways and recreational use of The Drift. (see illustration on page 17 for alternative proposals)

E169 – A reasonably well-used bridleway linking the PROW network off The Drift with Essendine and the back road to Belmesthorpe. The proposed solar arrays would stand on both sides of the bridleway along almost all of its length. This would result in the bridleway becoming a strip of land within the equivalent to an industrial estate. The only views would be of stark and utilitarian structures.

Although screening is proposed to be planted, this would not mature for about 20 years and would in itself result in the bridleway becoming a tunnel.

Green Lane - DMMO188KB - A very popular bridleway, used both by walkers, riders and cyclists and is part of a useful recreational circular route from Ryhall. The path would be flanked by the solar arrays along its whole south side. It is inevitable that the amenity of the path would be harmed by the development.

E182 - BrAW/1/1 - This bridleway provides the only off-road PROW link across the east coast main line between the Greatford and Braceborough roads. As such is it popular with horse riders, walkers and cyclists. The

bridleway would be dominated by the proposed development with fenced in solar arrays on both sides of the path. Views from the path would be restricted and, like bridleway E169, the development would create an enclosed, claustrophobic tunnel which would be unpleasant to use.

Screen planting would take 20 or more years to form an effective screen and, as for E169, would in itself serve to block distant views and add to the sense of enclosure when grown.

Road Network – Several of the lanes within and close to the development area are used as quiet roads for walking, riding and cycling.

The prominence of the proposed development in the landscape means that the recreational value of these roads will be harmed considerably.

PROW Summary -

- The proposed development would cause great harm to the PROW and recreational road network in the area.
- Because of the scale of the development, residents from nearby settlements and from isolated dwellings in the development area would not be able to take outdoor exercise or experience the countryside without being in close proximity to the solar development.
- Because of the size of the arrays (3.3 m high) and stark design of the development as a whole, the development would be overbearing when viewed from the PROWs, especially when on both sides of the PROW
- The use of 2.2 m high security fencing, security cameras and lighting would add to the overbearing character of the development and would be likely to dominate users of the PROW.
- The recreational value of many of the paths and bridleways would be harmed to the extent that the paths would be unpleasant to use and would be likely to result in current users electing not to use them.
- EN-3 states:
 - 3.10.27 Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way, where possible during construction, and in particular during operation of the site.
 - 3.10.28 Applicants are encouraged where possible to minimise the visual outlook from existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.80
 - 3.10.29 Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the adoption of new public rights of way through site layout and design of access.

The proposed development fails to meet these aims

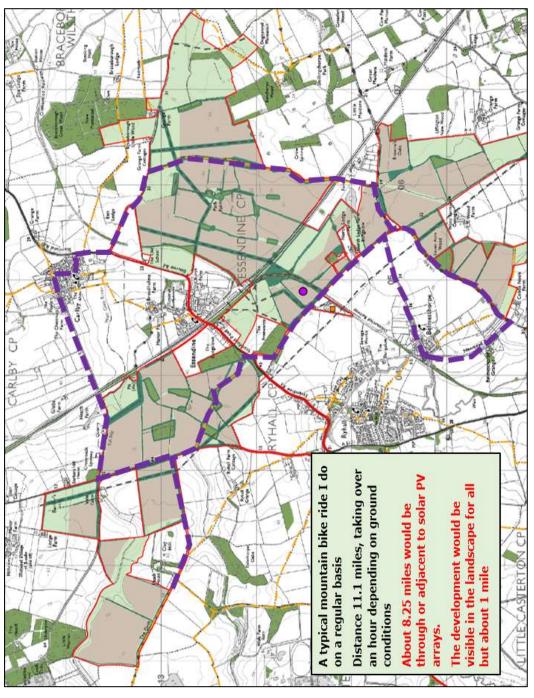
4. Proposed Permissive Routes

The applicant proposes creation of several permissive paths. Whilst these would improve off-road connectivity, their recreational value would be very limited because they would pass through and next to the blocks of solar arrays. Consequently, the amenity value of the routes would be limited for the same reasons that the value of the existing PROWs would be harmed by the proposed development.

Further, EN-3 3.10.29 (above) encourages the creation of new PROW. Permissive routes would not meet this aim.

All proposed permissive routes should be adopted as PROW.

To illustrate the scale of the issue, this is a route I cycle regularly. Almost none of the route would be development-free



5. Noise

It is proposed that the solar panels are fixed on single axis tracker arrays.

The development are is generally quiet, especially at evenings and night.

It is inevitable that the sound of 1,000 acres or so of machinery moving would be very noticeable and would be audible within many dwellings in the local area.

Further the noise would detract significantly from the amenity of the area for all of those using it for outdoor recreation.

It is essential that any arrays are fixed only

(See indicative Sound Meter readings on pages 20 & 21 below)

6. Wellbeing

EN-1 paragraph 4.13.1 states:

Energy production has the potential to impact on the health and well-being ("health") of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the production, distribution and use of energy may have negative impacts on some people's health.

EN-1 paragraph 4.13.1 states:

As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on human beings, the ES should assess these effects for each element of the project, identifying any adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate. The impacts of more than one development may affect people simultaneously, so the applicant and the IPC should consider the cumulative impact on health.

Because of its size, scale, industrial design and appearance and its overbearing and intimidating appearance, the proposed development would dominate the development area and the surrounding area. Essendine would be largely surrounded by the development. Other settlements of Ryhall, Belmesthorpe and Carlby would have the development close by. Several isolated dwellings, such as those at Ryhall Heath and Barbers Hill would be very close to the development and would be dominated by the proposed development.

In their day to day lives, residents of these villages and dwellings would not be able to escape the overbearing presence of the proposed development. On its own, the overbearing presence of the development would cause people considerable stress for many people. Many people are stressed by the mere proposal.

Outdoor recreation is important for many people, for both physical and mental wellbeing. The proposed development would deter many residents in the local area from taking outdoor recreation and, when they do, the quality of the experience will be greatly diminished.

The development area and the surrounding area is used by residents or nearby towns of Stamford and Peterborough, as well as tourist visitors (cycle clubs from the south-east regularly visit the area because of the quiet roads). The harm the development would do the character and

appearance of the area would harm their experience and have an adverse impact on their wellbeing.

If single axis tracker arrays are installed, the noise generated would be very intrusive and would be likely to cause considerable stress to occupiers of dwellings close to the development.

The development would not make the development area or the surrounding area better for people living in, living close to or visiting the area, contrary to the aims of the Framework, EN-1 and EN-3

The cumulative adverse effect on health of this proposed development would be significant. The overbearing nature of the development affecting whole communities and well as individuals.

7. Economy

Because of the proposed development's overbearing presence and considerable harm it would cause to the character and appearance of the area, it would result in significant harm to the local economy.

Property Values – It is inevitable that property values would be harmed as a result of the development. Obviously the effect on values would be most severe for those properties within and close to the development area. However, it would be reasonable to assume that there would be a lesser effect on values of properties in the wider area. Whilst values of property in Stamford may only be marginally affected, cumulatively the effect would be significant.

Whilst property value itself may not be a relevant planning issue, reduction in people's equity would lead to a loss of wealth with a reduction in economic activity. Cumulatively the effect on the local economy would be significant in this respect.

Tourism – There are several bed and breakfast businesses in the local area. They prosper on the back of their rural local and tranquil countryside. The Harms that the development would cause to the character and appearance of the area would undermine these businesses.

Further, day trip tourism is considerable, especially cyclists visiting the area from busier parts of the country to take advantage of the quiet roads and countryside landscape.

The Framework seeks the planning decisions to support a prosperous rural economy. The proposed development would bring very little if any employment or other business opportunities to the local area. Further, it would cause a significant cumulative loss of wealth for resident in the local and wider area, with consequential harm to the economy, contrary to the aims of the Framework EN-1 & EN-3.

8. Agricultural Land & Food Security

8.1 The proposed development would result in a significant loss of productive arable land, at a time when UK and worldwide food security is under significant pressure.

In the battle against climate change, there is increasing encouragement from governments and society to adopt a more plant based diet. Using arable land capable of growing a variety of plant crops goes directly against this aim.

Whilst this is just one proposed development, there are numerous proposed large solar projects planned and proposed for Lincolnshire. If this proposal is allowed in its current form, a strong precedent would be set for other similarly sized projects throughout the UK. The cumulative effect of this could be catastrophic to the UK food security.

Much is said about using brown field land for such developments. Sites such as the former Woolfox RAF base next to the A1 should be used for this type of development before taking good arable land. Woolfox is 5.2 miles as the crow flies from the substation at Ryhall which is well within the limits for viable connection of a solar farm.

8.2 If this development is permitted, it is essential that a temporary permission is given only. Technology will almost certainly make solar power generation of this type obsolete in time.

The land used should be kept in a condition suitable for return to agriculture. This includes planning any landscape tree planting so that field size and shape is maintains so that the lands would be suitable for a return to arable farming in future. Creation of unduly small fields with impractical corners and shapes would make use my modern farm machinery impractical, potentially rendering the land unviable for modern agriculture in future.

9. Ryhall Heath & The Drift

Fields 1, 2 & 3 - Land north of The Drift, Ryhall Heath

9.3 The Drift - Public Access

This is a tranquil area greatly enjoyed by the public for informal recreation. The Drift, a single track, unclassified road which turns into a byway open to all traffic (BOAT) runs along the southern edge of the proposed development, in particular Fields 2 & 3.

The Drift is one of the most used public rights of way in the north Stamford area.

The eastern, metalled section or road next to Field 2, is particularly popular with walkers who are less confident or able, preferring the quiet road to the wider farmland footpath network. Seldom does one pass down the metalled section of road and not pass one or more parked vehicles and walkers, cyclists, horse riders.

Because of the quiet and safe nature of the road, it is used regularly by wheelchair and mobility aid users. There are very few, if any similar opportunities to experience the countryside in this area north of Stamford. The nearest alternative safe and easy access being Burghley Park which, because of traffic congestion in the middle of Stamford, is not always easy to get to.

Many users merely stop on the side of the Drift for a picnic and to enjoy the countryside in a relatively passive way

Users of the road particularly enjoy the wildlife, being able to experience the wide variety of birds and mammals present on the adjoining farmland from the easily and safely accessible and quiet single track road.

The proposed development of Fields 2 & 3 would have a significant adverse effect on the amenity of The Drift because:

- The stark and industrial development of Fields 2 & 3 would be very prominent in the landscape when viewed from The Drift and would detract considerably from the amenity of The Drift.
- The inevitable reduction in the amount of wildlife present, in particular farm and birds such as sky lark, red kites and buzzards, quail in summer, would be missed greatly by many who use The Drift for recreation.
- The use of the existing field access into Field 2 would create an intimidating entrance to The Drift for many users. 2m high security gates and fencing with signage and security measures would no doubt deter people from entering The Drift and would detract considerably from the tranquil, rural character and appearance of The Drift as a whole.

9.4 Safety of Access into and from The Drift onto the B1176

Visibility - Visibility for vehicles exiting from The Drift onto the B1176 is not very good. In particular, there is a blind spot with vehicles in dip to the south of the junction not being readily visible to drivers exiting The Drift, especially in summer when grass is longer.

Further, vehicles travelling from the north also are not visible until they have crested the rise in the road. Whilst some 150 metres away, vehicles travelling at speed can pose a significant risk to vehicles exiting The Drift.

Parking - The verges at the entrance to The Drift are popular spots for car parking for those vising The Drift. Construction of a new, industrial entrance into Field 2 at this point would conflict with this use.

In these respects, use of this junction by construction traffic and as permanent entrance into the development of Fields 1, 2 & 3 would be harmful to the safety of users of the B1176 & The Drift and would detract significantly from the amenity of The Drift for recreational users of the road and byway.

8.3 Alternative Location for Access to Development

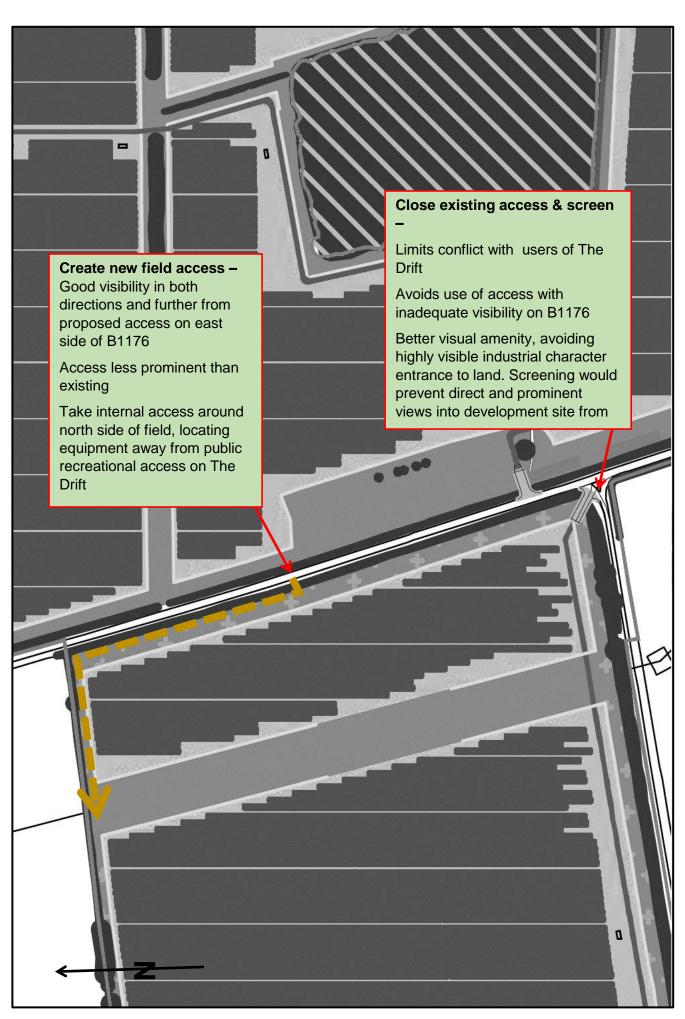
A better location for the access to the proposed development of Fields 1, 2 & 3 would be directly onto the B1176, about 150 metres to the north of the entrance to The Drift.

Benefits would include -

- 1. **Better Highway Safety** Visibility for construction traffic from the proposed alternative would be good and conflict with use of The Drift would be minimised. Further, the access would not be so close to the development proposed access to Field 6 and beyond on the east side of the B1176.
- 2. Better Appearance The existing field access allows direct views into Field 2 from the B1176 and The Drift. Because of the position and angle of the gateway, views of the proposed development, including the security fencing, gates, signage and solar arrays would be particularly prominent when viewed from vehicles travelling north on the B1176 and entering The Drift. Closure of this access would allow for landscape planting which would in time help to screen the development.

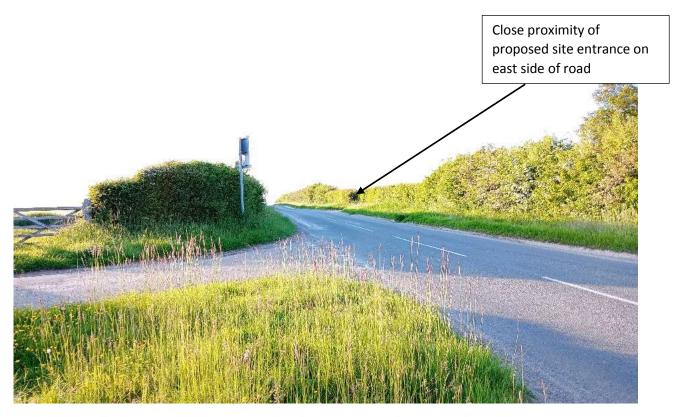
If the Inspector is minded to recommend approval of the proposed development of any of Fields 1, 2 or 3, I would urge that the access is redesigned to an alternative location which would result in less harm to safety of users of the highway and less harm to the amenity of the B1176 and The Drift.

See illustrative plan on page 16 and photos on 17 & 18 below:





View south on B1176 from vehicle exiting The Drift



View north from existing exit onto B1176

Views north & south from proposed alternative location





Google Streetview of existing field entrance to Field 2. There are clear views into the field. Closure of this entrance and planting of screening would have a significant impact in reducing the stark appearance of the development in the immediate landscape. This would enhance the experience of people driving along the B1176 as well as making The Drift more pleasant for recreational users



8.4 Noise & Disturbance

It is proposed that the solar panels are built as single axis tracker PV arrays.

The area off The Drift is very quiet. In the evening, at night or on still days, the background noise level is frequently below 5 decibels. The noisiest thing is often be the wildlife or a moped travelling along a lane a couple of miles away.

It is inevitable that the background noise of over 100 acres of moving machinery in Fields 1, 2 & 3 would be clearly audible within the nearby dwellings, especially those at Ryhall Heath on The Drift. This would especially apparent in summer when windows are more likely to be open and the air is often still.

The installation of moving arrays would result in considerable harm to the living conditions of occupiers of the nearby dwellings as a result of intrusive noise which would stand out in contrast with the generally quiet and tranquil surroundings. Such noise would be oppressive and lead to loss of sleep.

It should be remembered that children and elderly sleep at all times of day, not just night time.

These effects could lead to significant stress for individuals and would harm their personal wellbeing.

If the Inspector is minded to recommend approval of the proposed development of any of Fields 1, 2 or 3, it is essential that none of the arrays are moving.

The proposed Inverters and Transformers would be situated in prominent locations within Fields 2 & 3. Any noise from these would travel easily and would be audible from The Drift and potentially from nearby dwellings.

If approved, in order to limit noise disturbance of The Drift, the proposed inverters and transformers in Field 2 should be located on the north side of the field away from the publically accessible area of The Drift. This would fit well with the proposed alternative access.

Similarly, the Is & Ts in Field 3 could be located on lower ground to the north side of the field. This would provide natural sound buffering.



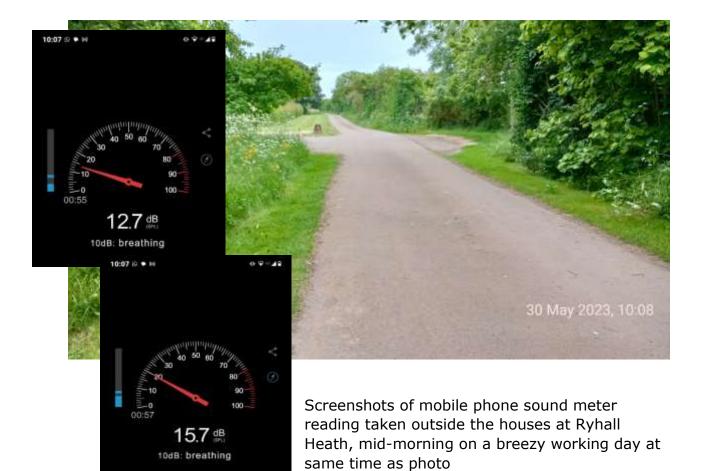
Screenshot of mobile phone sound meter reading taken from Little Warren SSSI at same time as photo



Screenshot of mobile phone sound meter reading taken on the B1176 crossroads at same time as photo (screenshot not time stamped for some reason)



Screenshot of mobile phone sound meter reading taken on the Drift by Field 2 at same time as photo (screenshot not time stamped for some reason)



8.5 Landscape

Field 1 -

Field 1 lies next to the Little Warren Verge SSSI and lane leading to Holywell. The 3.3 metre tall solar arrays would be very prominent when viewed from the road as well as being visible from distance from The Drift byway.

The development would block views of the landscape from the road.

Consequently, the development would detract from the rural character and appearance of the SSSI and the area as a whole.



Effective view of 3.3m high solar panel as proposed, set 15 m back as proposed



Similar view 27.05.23 – pile of manure approx. 2.5 m tall (compared to 3.3 m high panels) – illustrates just how all view of the wider landscape would be blocked by solar arrays and how prominent the development would be

Field 3 -

This field lies to the north of The Pickworth Drift byway. The field is gently rolling, dipping down to a seasonally dry valley which has a stream running in it in winter when the water table rises. There are good views of the field and to the landscape beyond from The Drift.

The proposed arrays would stand about 3.3 metres tall and would be surrounded by 2.2m tall security fencing. As a consequence of the arrays' stark and utilitarian appearance, their height and expanse of land covered and the security fencing, the development would appear very stark and dominant when viewed from The Drift. This would be very harmful to the character and appearance of the Drift and the wider landscape.

The proposed Transformers and Inverters would be situated on more or less the highest part of the field. These box like structures would stand out in the landscape as being particularly alien features, even in sea of solar panels.

It is recommended that if the development is allowed, that these structures are placed on lower ground below the skyline to the north side of the field. Whilst the field is sloping at this point, the limestone base rock would provide a good base for forming a service track and service area on the slope.

There is a small spinney on The Drift which is a prominent feature n the landscape and is important to its woodland habitat. It is important that this spinney is maintained and preferably enhanced as a landscape feature.

Field 3 is visible from Little Warren SSI and from the land running along the south side of Newell Wood. The lane next to Newell Wood is particularly attractive and views of the development of Field 3 would result in significant harm to the lane's overall character.



View from gateway on Holywell Road, Little Warren Verge SSSI 31 July 2022



Effective view of proposed solar arrays from gateway on Little Warren Verge SSSI on Holywell Road



View from lane by Newell Wood



Approximate appearance of solar arrays from lane by Newell Wood

Field 2

Field 2 lies immediately north of the metalled section of The Drift. Although relatively well screened in places by thick natural set hedging on The Drift verge, it is open to view throughout winter. As above, the proposed development would be particularly prominent when viewed from The Drift and would appear and an overbearing, industrial scale development which would be out of keeping with the character and appearance of the area and the Drift in particular.

8.6 Proposed Screening

Field 1 - It is proposed to plant a new hedgerow along the bottom of the solar array enclosure on Field 1. This would serve no purpose in screening from public view whereas no screening is proposed for the public view of the proposed development from Little Warren SSSI

Field 2 – Whilst there is a good hedge on The Drift which provides a reasonable screen to the field in summer, it is patchy and does little in winter. Landscape planting should be provided for both roadside boundaries to the solar array enclosure

A screening hedgerow is proposed for the western internal field boundary which, again, would serve no purpose in screening from public view

Field 3 – Hedgerow screening is proposed for the boundary with The Drift. Any panting would need to be set back from the spinney on The Drift as plant establishment in the shade of the existing mature trees would be poor.

A new screening hedgerow is proposed for the northern boundary of the solar array enclosure. This would serve no purpose in screening from public view. However, nothing is proposed for the east and western boundaries which are visible from the public domain.

8.7 Wildlife

The Drift is a very important wildlife corridor and habitat. It has thick hedging and trees along much of it as well as valuable limestone grassland with a wide range of flora. Consequently The Drift supports a good and varied population of birds, insect life, mammals and flora. It is important that development does not disturb or harm this. Noise from machinery working on the site would be likely to disturb breeding birds on The Drift, which include a variety of warblers, yellow hammer and tree sparrows which are increasingly rare species.

The development area attracts a wide variety of breeding and over wintering birds. Notable protected species breeding on the area include sky lark and quail which knowingly last bred on Field 3 in 2021. The development would drive these species away from the land, taking valuable breeding habitat which is not readily replaceable or capable of relocation.

Badgers are frequent throughout the area and there are primary and secondary setts in Field 3. The proposal plans do not appear to allow sufficient buffer between the edge of the fenced enclosures and the setts.

There are good populations of Hares through the area off The Drift. It is a concern that the development would take valuable habitat away from this protected species.

8.8 Compensatory Habitat

The development proposals indicate areas of land which the developer identifies and biodiversity enhancement. It should be noted that much of this green space already exists, some of which is very rich in flora. In particular the southern end of Field 1 has a particularly rich and diverse limestone flora which is equally as good, if not better, that the adjoin SSSIs at Ryhall Pastures and Little Warren Verge. In calculating biodiversity net gain, the areas of existing grassland throughout the development area should not be added in as new habitat.

9. Cultural Values

The well know poet John Clare used to live and work in Pickworth. He is known to have visited a milk maid called Matha "Patty" Turner who lived at Walk Farm, a grade II listed converted barn about 1100 metres south of The Drift and visible from The Drift.

The Wikipedia entry for John Clare states:

John Clare (13 July 1793 – 20 May 1864) was an English poet. The son of a farm labourer, he became known for his celebrations of the English countryside and sorrows at its disruption. His work underwent major re-evaluation in the late 20th century; he is now often seen as a major 19th-century poet. His biographer Jonathan Bate called Clare "the greatest labouring-class poet that England has ever produced. No one has ever written more powerfully of nature, of a rural childhood, and of the alienated and unstable self." [3]

The Drift is often walked by people interested in John Clare and those who wish to experience some of the rural tranquillity he wrote about.

The proposed development off The Drift, particularly Field 3, would damage this rural tranquillity and harm the cultural value of Walk Farm. Thus failing to preserve the character of a designated heritage asset and harming the setting which is so important to the history and poetry of John Clare.

10 Private Domestic Water Supplies to Ryhall Heath

The dwellings at Ryhall Heath are served by three privately owned 30 mm water pipes which are run through the grass verge along the B1176 and The Drift, next to Field 2. These pipes were laid under licence under licence from Leicestershire County Council (Department of Planning & Transport) dated 14 May 1991.

As the only domestic water supply to these properties, it is essential that these pipes are protected during any construction and thereafter.

If permission for the development of Fields 1, 2 or 3 is given and access taken off the B1167 or The Drift, the developer should be required to protect the water supply pipes before the start of any works within Fields 1, 2 or 3.

If it is intended to take cabling along this same verge, it should be relocated to the eastern verge, away from the water supply.

We propose the following for any locations where the pipes would be crossed by construction vehicles:

- Excavate the existing pipes and lay protective concrete over to prevent damage from heavy vehicles
- Adjacent to the pipes, lay new 300mm diameter ducting with access points at each end, so, in the event of the pipes requiring repair at any time, replacement sections may be run through the ducting to avoid the need to excavate the entrance to the development area
- The developer top provide an independent engineer's report to the householders to confirm that the works have been done to a correct standard.
- Signs to be erected during the construction period to warn any contractors of the location of the water pipes.
- No development work to be undertaken in any of the Fields 1, 2 or 3 until these protective works have been completed and signed off by the planning authority

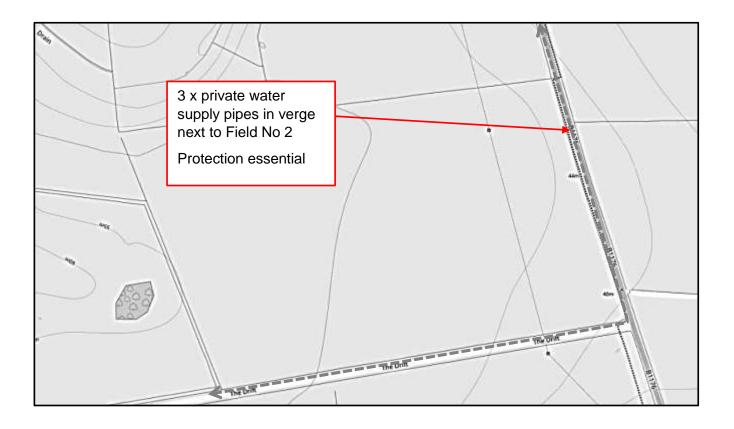
Where cabling passes under or next to the water supply pipes:

• The water pipes should be similarly protected and ducting provide as above so that any future so that any future repairs and replacements to the water supply can be done without the need to dig near to the electricity or other cables.

If the proposed development would result in significant disruption and disturbance to the water supply, the developers should be required to extend the Anglian Water owned main water main from the existing hydrant on the B1176 to a point on The Drift where the existing supply pipes to the dwellings may be connected safe of interference from the development.

Further, the current water pressure is on the limits of what can be supplied to the dwellings at Ryhall Heath. The pressure inside the properties is low. It is essential that this pressure is preserved. Accordingly, the developers should be required not connect to this water main for any purposes, whether for a temporary supply to service mess facilities during construction or as a permanent connection.

The developers should be required to provide a detailed water supply management plan for approval prior to the start of any works.



11. Summary

- The scale of this proposed development is such that it would engulf whole communities
- Because of its industrial character and appearance, the development would cause considerable harm to the character and appearance of the area
- The rolling topography of the site means that the development would be very visible in the landscape from both nearby and close up
- There is a lack of screening proposed and such screening would not be
 effective for many years. This is a dry part of the country with slow tree
 growth rates. This is especially so on the limestone which is very free
 draining. It is reasonable to expect a shelter belt to take about 20 years
 before it reaches a size and density that it would act as a screen
- Noise of construction and when operating (single axis tracking arrays)
 could result in considerable harm to the living conditions of occupiers of
 nearby dwellings as well as to wildlife
- Because of its scale, appearance and lack of ability to mitigate, there
 would be considerable harm to the wellbeing of residents within the local
 area as well as visitors to the area
- The wellbeing of residents in the local and wider area would be harmed by the harm the development would do to the local economy
- The cumulative effect of this proposed development with other in the pipeline in eastern England, the major food producing area of the UK, would result in considerable harm to UK food security
- There are detailed and specific issues which would require resolving to make this an acceptable scheme
- Of particular relevance to the residents of Ryhall Heath is safety of access, noise and disturbance and water supply
- The Nation Planning Policy Framework seeks sustainable development which includes development which creates better places in which to live. This proposal fails to do this and would result in creation of an industrial wasteland which would blight the lives of the residents living in and close to the development area

Overall, this scheme is too large and badly designed and I urge the Inspector not to allow this application in its current form.

Copy of the Mallard Pass Stage Two Consultation comments submitted to Mallard Pass in August 2022

Comments - J A B Gresty 1 August 2022

Roughly following the order of the Mallard Pass Solar Farm Stage Two Consultation Document, I comment on the proposed development as follows:

2.0 Proposals

"420 ha will be for ecological mitigation"

This is a highly misleading statement

The site includes large areas of farmland (420 ha), most of which will remain in agricultural use. These areas should not be included as part of the site as their use will remain unchanged.

To state that these areas would be Mitigation Land is misleading, giving the impression of 420 ha of new wildlife habitat creation. Much of this land is already in Agri-Environment Schemes (see attached Magic Map screenshot) and has good habitat connectivity and significant areas of valuable wildlife habitat in its own right, especially grass field margins and hedges which are maintained by the existing farming operations for their habitat and environmental value.

These agri-schemes are due to end by 2028 but, with the introduction of Environmental Land Management (ELMs) as a fundamental pillar of the Government's post Brexit agricultural support policy which is "intended to support the rural economy whilst achieving the goals of the 25 Year Environment Plan and the commitment to net zero by 2050", it is reasonable to assume that most of the existing habitat enhancement features will remain and, in all probability, will be increased as farmers and landowners enter their land into ELMs as necessary part of their farm/land management plans.

Accordingly, the "ecological mitigation" proposals are largely a replication of current and future farming practises and should not be included in the development site area and the public should be actively advised that the 420 ha of new ecological mitigation is not being proposed.

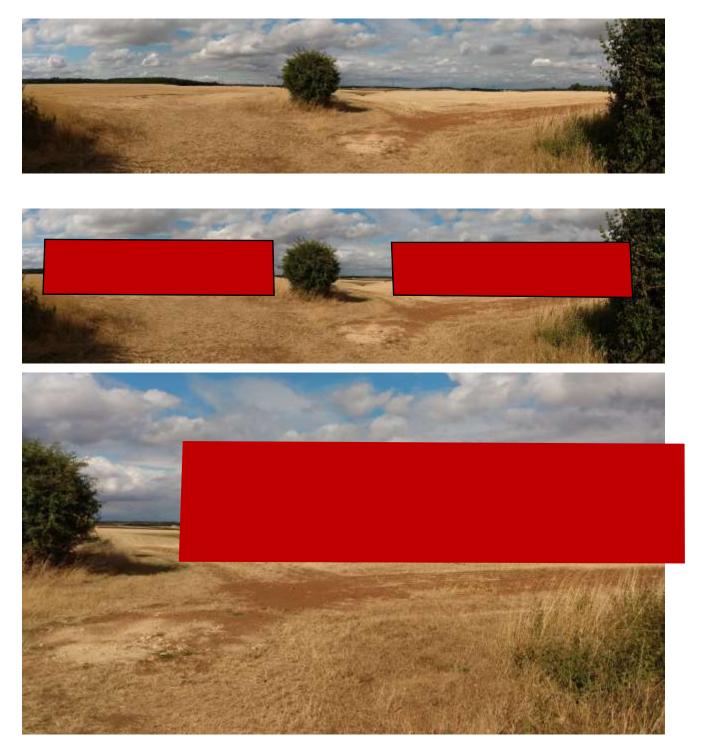
2.2 "In addition, new hedgerow planting and tree belts and woodland blocks have been introduced to limit any potential visual impact from particular public vantage points"

The main structures of the development (the solar arrays) will be 3.3 metres high and there will be lightening conductors and shipping containers. It will take at least 20 years for any new planting to screen these structures when viewed from adjacent ground level. Consequently, at best, the development would remain highly visible for at least half of the proposed 40 year design life of the development.

Further, the proposed planting (as illustrated viewpoint 4 – Carlby Road photomontage below). Of three rows of broadleaf trees and shrubs will not act grow to be an effective visual screen, even when fully established, and in winter would have virtually no screening effect.



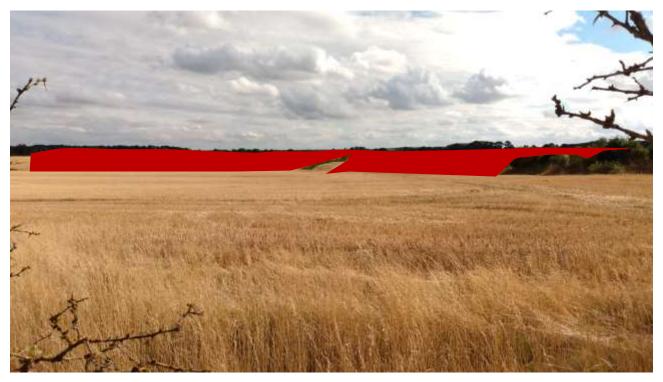
Much of the development is proposed to be on undulating land and, consequently, will be open to close and distant public view from many vantage points. The proposed structures will prevent distant views of landscape beyond the development site. The proposed planting would not mitigate these adverse effects on the landscape and the public enjoyment of it.



Effective view of a solid 3.3m high structure set back approx. 15 metres from PROW on The Drift



View from gateway on Holywell Road, Little Warren Verge SSSI 31 July 2022



Effective view of proposed solar arrays from gateway on Little Warren Verge SSSI on Holywell Road



View of Field No 1 from gateway on Little Warren Verge SSSI on Holywell Road



Effective view of 3.3m high solar panel as proposed, set 15 m back as proposed

"We are supporting the recreational and amenity opportunities by retaining all Public rights of Way within the Site"

This is a misleading statement in that the proposed development will result in significant harm to the character and appearance of the area and will greatly reduce the amenity value of the PROWs within and close to the development site. The stark and overbearing appearance of the solar arrays when viewed from both PROWs and public highways will undermine the use of the PROWs and the recreational use of the mainly quiet roads in the local area which are themselves important recreational resources.

As can be seen above, the proposed 3.3m high solar arrays would block all views and would appear very stark and overbearing when viewed from the PROWs.

2.4 "We have introduced approx' 4.7km of new permissive paths"

Whilst these may provide temporary circular routes from Essendine, their amenity value will be very limited because they pass through the solar arrays and they will do nothing to overcome the harm done to existing PROW network.

No parking facilities for members of the public from elsewhere in the areas are proposed.

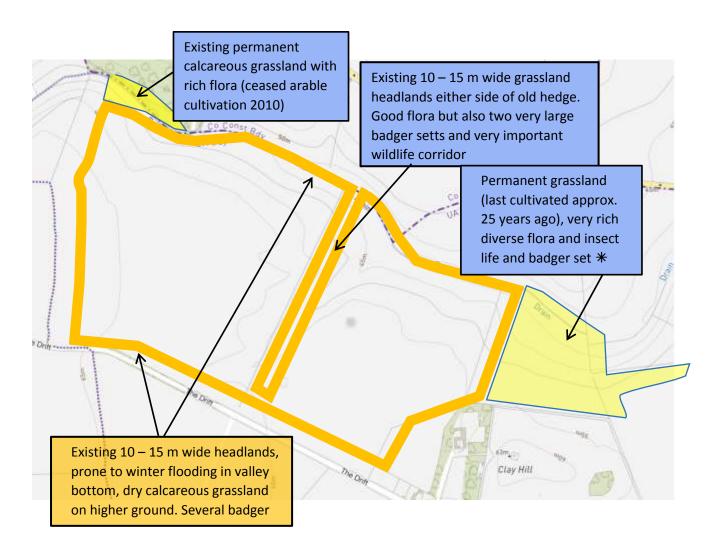
The value of the proposed permissive paths would, therefore, be very limited and do little to mitigate the harm the proposed development would do to the wellbeing to residents in the locality or the wider public.

2.3 Enhancing biodiversity and ecological connectivity

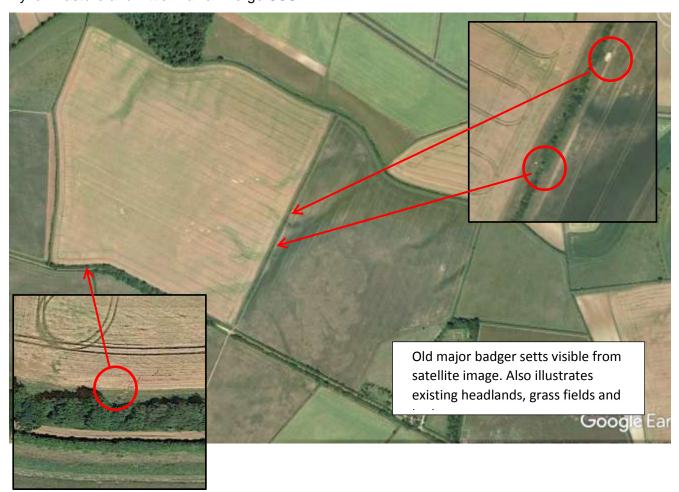
As stated above, much of the 420 ha of land outside the solar array area already has very good ecological connectivity and Government agricultural and environmental policies are only going to result in greater emphasis of enhancing biodiversity and connectivity of these areas, without the need for inclusion of this land in the proposed development area. The proposals do not demonstrate net environmental benefits over and above what the emerging agri-environments schemes will deliver.

The Drift Grassland Corridor – The Drift is not only an important grassland habitat but a very valuable bird, and other wildlife habitat. Regular ringing of birds by the BTO in the past demonstrates the wide range of species using the hedges and scrub as both a corridor and a breeding habitat. No measures to improve this have been proposed and no evidence has been presented to indicate what adverse effects the proposed development would have on the ecological value of the Drift Grassland Corridor.

30 ha of wildflower grassland – much of the area shown is already grassland with a rich grassland flora. In particular the field (part field No 1) immediately north of Heath House and the headlands have a particularly rich flora and are also valuable habitats for ground nesting birds, reptiles, mammals and insects. These areas should be excluded from the development site and certainly should not be included as mitigation as little could be done to improve the existing habitat or management on much of the grass headland and permanent grass areas as illustrated below.



* Flora in this field includes – pyramidal orchid, common spotted orchid, bee orchid, common broomrape, knapweed broomrape, yellow rattle, harebell, cranesbill, lady's bedstraw, scabrous, vetches, knapweed. These species are also found in lesser numbers throughout the grassland headlands shaded yellow on the plan above. The range of species is similar to that of the nearby Ryhall Pasture and Little Warren Verge SSSI



"We are also adopting skylark plots, grazed grassland, hedgerows and woodland belts..." It is not clear what this means or how this will offset the harms to wildlife of proposed development. Species such as skylark are frequent throughout the site and will be displaced by the solar arrays. The large, continuous blocks of solar arrays will result in exclusion of species like skylarks from these areas and evidence has not been presented to demonstrate that nearby land outside the array areas would be capable of holding greater numbers of birds like skylarks or barn owls than at present.

Quail - One notable rare bird species ignored in the development proposal is **Quail**. Quail are regular summer visitors to the higher ground limestone areas in the west of the site (their calls can be heard every 2 or 3 years from The Drift). As far as we are aware, they last bred on the land north of The Drift in 2020, their very distinctive calls at dusk being present throughout June and July of that year. Quail are an Amber List species, listed in schedule 1 of the Wildlife and Countryside Act, and the proposed development would result in significant loss of suitable habitat for them in the western area of the development site.

Evidence has not been presented to demonstrate how other displaced species will be accommodated.

Hares are frequent throughout the development site, particularly on the upland limestone in the western area of the development site. Hares will not use badger flaps in fencing. Hares restricted by the proposed security fencing will be put at greater risk of illegal hare coursing as their opportunities

to escape would be restricted by the security fencing. The development would greatly harm hare populations.

Lizards and Grass Snakes – The proposals ignore the effect of the proposed development on these two protected species. Common Lizards and Grass Snakes are common throughout the development area and it must be made clear how these Priority Species would be protected both during construction and afterwards.

Topography – "The site has a gently undulating topography which makes it particularly suitable for solar"

This statement defies reality.

The undulating landscape results in significant parts of the site having a northerly aspect. The undulating landscape also results in the development site being open to wide and varied public view from public.

The undulating topography contributes very positively to help create an attractive landscape which enhances and contributes to the character and appearance of the area.

The scale and utilitarian design of the proposed development would result in a prominent, stark industrial landscape which would be open to wide public view, both distant and close

The developer's statement that "The site has a gently undulating topography which makes it particularly suitable for solar" is contrary to the design guidance of paragraph 2.49.3 of the Government's emerging Draft National Policy Statement for Renewable Energy Infrastructure (EN-3) which states that "a flat topography is often favoured".

Proximity to People's Homes -

The developer indicates that harm to the living conditions of the residents of Essendine, Carlby, Ryhal, Aunby, Ryhall Heath and isolated individual properties can be prevented by sensitive landscaping and location of panels. The draft plans indicate that there will be significant areas of arrays in close proximity of dwellings.

Whilst not all arrays will be visible from dwellings in the settlements, there will be clear and as well as partially obscured views of the proposed development from many dwellings. The stark, industrial and overbearing nature of the development would result in significant harm to the living conditions and well-being of local residents.

Noise -

The developer is reserving the right to install Single Axis Tracker Arrays which it is understood would move throughout the day and return to their original position over night. Much of the site development site and adjoining land is a very quiet area with background noise levels often below 10db at night time, especially on still summer nights.

Background noise from SAT Arrays on the proposed development would be very audible from within nearby dwellings, especially on warm summer nights when windows are open, and would result in undue harm to the living conditions of the occupiers of those dwellings. This would be contrary to the principles of sustainable development as sought by the National Planning Policy Framework.

Landscaping would not overcome these adverse effects and, given the size of the proposed development, it is unclear how location in relation to dwellings would overcome disturbance by noise.

Other Factors

Figure 1.1 – Site Boundary

The Drift -

The site plan and application plans include The Drift, a Byway Open to All Traffic and Unclassified Road within the development area. Other than in one photo, no reference is made to The Drift as a much-used PROW in the proposals.

The Drift is one of the most used recreational routes in the Stamford and Ryhall area.

The eastern section of The Drift is a single track, metalled lane which is used every day by many recreational walkers. It is especially valuable because it is easily accessible and is used by wheelchair users and less robust walkers as a peaceful, safe route in the countryside with easy roadside parking.

The proposed construction access into Filed No 2 at the junction of The Drift with Bytham Road would be intimidating for recreational users of The Drift, especially for the older and less able users. The intimidating effect of construction on horse riders and cyclists would be significant.

The western section of The Drift is a stone track, again much used by walkers and cyclists as well as some horse riders.

The significant harm to the amenity of this very well used PROW that the proposed development would result in has not been taken into account. There would be significant harm to the wellbeing of a significant number of residents in the Ryhall and Stamford area as well as visitors to the area, who regularly use the route

Figures 1.1, 1.2, 3.1 & others – Farmland not part of the built development –

As above, the proposed development site includes farmland where the management will be all but unchanged and alleged mitigation measures are either already present or would be likely to occur in a non-development scenario as governmental agri-environment schemes develop e.g. ELMS. Accordingly, many of the proposed mitigation measures located outside the solar array fields areas would not be additional to existing. All such farmland areas should be removed from the site as their inclusion provides an inaccurate indication of the effective extent of such measures.

Figure 3.2 – Field Numbers

The field numbers include parts of multiple fields. E.g. Field No 1 is made up of parts of three separate fields divided by hedges. This is misleading, giving the impression of fewer existing fields with their own hedgerow boundaries would be affected by the proposed development than is proposed. Consequently, the adverse effect of the proposed development on existing wildlife corridors and landscape is misrepresented

Cultural heritage

The western area of the development site would be visible from The Drift and Walk Farm, a grade 2 listed building. The famous poet John Clare used to walk from Pickworth to Walk Farm and followers of the poet often walk along The Drift to experience the landscape written about by John Clare. The proposed development would undermine the heritage experience and consequently harm the character of the area, contrary to the principles of sustainable development.

Public Consultations

Canadian Solar claims to have conducted two public consultations:

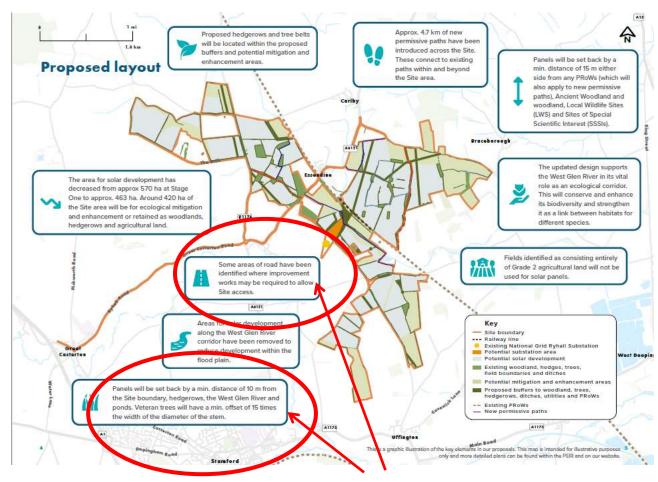
A Stage One, non-statutory phase consultation

The information provided in the leaflet sent to local residents was misleading in that the plan showing the outline of the proposed development was very faint and it was all but impossible to tell where the proposed development would be, its size or extent. Anecdotally, a very small proportion of the recipients of the leaflet were able to identify where the development would be and consequently were actively disengaged from the consultation process.

Stage Two Statutory Consultation - Community Consultation Leaflet

The Stage Two Community Consultation Leaflet proposed development was misleading and unclear.

Proposed Layout Plan - Principal settlements and roads were depicted in a pale grey, making interpretation for most readers difficult / impossible. The two largest settlements, Stamford and Ryhall, both close to the proposed development and whose residents will be affected by the development should it go ahead, are effectively removed from the plan by blocks of text. Inexperienced readers of plans would not know just how oose the development would be to either Stamford or Ryhall.



Ryhall & Stamford blocked out by text

Stage Two Events and Webinars

It should be noted that **NO** images to illustrate the appearance of the proposed development were displayed at any of the events held at Essendine, Stamford, Greatford or Ryhall. Nor are there images illustrating the appearance of the proposed solar arrays in the Consultation Leaflet or easily found in the consultation documents available to view on-line.

Appearance, which include scale of structures, of the proposed development is very important factor and the Stage One and Stage Two Consultations have failed to provide the public with clear information about the development in this respect.

It should be noted that the Ryhall event was held on just one workday afternoon when most people would not be able to attend. Ryhall is a large settlement in close proximity to the development and the consultation has failed to provide residents with proper opportunity to see the proposals.

Conclusions -

Sustainable Development -

The National Planning Policy Framework (the Framework) indicates that sustainable development is at the core of Government planning policy. There are three overarching objectives of sustainable development: economic, social and environmental.

Economical – The proposed solar farm development does not address what would be its significant adverse effect on the local economy of the Stamford and Rutland area.

The design, appearance, use and scale of the proposed development would result in the area north of Stamford having a predominantly industrial character and appearance. This would inevitably adversely affect the local economy, discouraging tourism and inward migration of working families.

There would inevitably be an underlying reduction in residential property values, not just of properties within the development area but also in settlements such as Ryhall and Stamford, which would have a direct effect on personal wealth of residents in the area. This in turn would affect the local and wider economy as there would be a general undermining of personal wealth. Simplistically, if houses have an average value of £300,000 all lose 10% of value, this is loss of £30,000 per household in the area. Say 2000 houses affected, total loss of value to the area £60m.

Clearly agriculture would be adversely affected with a significant loss of productive arable land capable of producing low carbon food crops. Just based on an array area of 460 ha, it would be reasonable to assume a loss of over 4,000 tonnes cereals and break crops each year which at current values could easily result in over £1.2m of addition grain and pulse imports each year. This is simplistic but the proposals do not address wider economic impacts of the development.

Whilst the development would generate significant income for the developer and landowners, it would result in deepset deterioration of the local economy, affecting many hundreds of households and thousands of individuals.

The Framework indicates that sustainable development should support a prosperous rural economy and should respect the character of the countryside. The development would undermine the local economy contrary to the requirements of the Framework. Also, proposed development, in particular its scale and its stark, industrial appearance, would not respect the character of the countryside.

The proposed development would provide no economic benefit for local residents and businesses.

Social -

Sustainable development should promote **healthy and safe communities**. This includes access to high quality open spaces.

As a result of its harm to the local PROW network, the proposed development would have a direct effect on healthy recreation. The PROWs in and next to the development area are well used and are enjoyed largely for their tranquillity and the personal well-being users derive from being in a healthy countryside with diverse wildlife and attractive scenery. The proposed development would result in loss of access to high quality open space for many local residents.

Good Design is a key aspect of sustainable development. The scale and bulk of the proposed development and its stark and industrial appearance does not represent good design. It would result in loss of attractive landscape and environment for residents and visitors to the area, resulting in significant social harm.

Many thousands of people enjoy and appreciate the rural landscape when driving along the main roads which run through the development site. The proposed development would result in industrialisation of the landscape which would have a significant impact on the well-being of those many thousand who experience the area north of Stamford through a car windscreen. The cumulative effect of this low key effect must not be ignored.

The Framework states that "Good Design is a key aspect of sustainable development, creates better places in which to live and work ..." The proposed development would not make the area in and around the development site a better place to live.

Environmental -

Whilst the proposed development may contribute to the goal of achieving net zero by 2050, the environmental effects are far from clear.

Immediately there would be a significant loss of wildlife habitat, resulting in harm to both protected species, such as hares, quail, skylarks and other species such as fallow deer which, whilst not a protected species, are a valuable part of the matrix which makes up the rich and diverse wildlife of Rutland and South Kesteven.

Unclear is displaced harm to the environment from sourcing of materials and manufacture of the panels to cost of importing more food with greater carbon and environmental footprint than home grown foods. Full analysis of the total environmental cost of the development should be provided.

Overall -

- The proposed development would result in a large, more or less continuous block of industrial plant, resulting in significant harm to the character and appearance of the local and wider area.
- The cumulative effect of scale, bulk, size, appearance, harm to wildlife, noise would result in significant harm to the living conditions of residents in the area and harm to the local economy.
- Consultations have been grossly inadequate and misleading.
- The size and layout of the development does not respect the naturally fragmented character of landscape and would, as a consequence of its size, bulk and design be an overbearing feature which would dominate the lives of local residents, contrary to the principles of sustainable development.

- Not only would the development be harmful to living conditions the occupiers of dwellings within and adjacent to the development area, it would engulf the settlements of Essendine and Ryhall, causing widespread and deep harm to the living conditions and personal wellbeing of those residents.
- The development would not represent sustainable development as sought by the National Planning Policy Framework or emerging National Policy statement for Renewable Energy Infrastructure (EN-3).
- A similar development of say 200 ha spread over the same area could no doubt be designed to largely overcome these adverse effects whilst still providing an economically viable opportunity to establish a solar electricity generating facility.