

Mallard Pass Solar Farm

Written Representation - Leicestershire & Rutland Area Ramblers

This written representation is made on behalf of the Leicestershire & Rutland Area Ramblers and, in particular, the Rutland Ramblers group. In it we raise our very real concerns over the Mallard Pass Solar Farm project, specifically the negative impact we believe it will have for walkers and ramblers.

1 Context

1.1 The Rutland Ramblers group alone has over 140 members, and has held organised walks in this area over many years, using the local network of Public Rights of Way (PROW). Other Ramblers groups, particularly from south Lincolnshire and the Peterborough area, also walk here, as do many Ramblers members (and non-members) on an individual, 'ad hoc' basis.

1.2 The Ramblers Association, our umbrella organisation, is a national charity dedicated to removing barriers so that everyone can enjoy walking in green spaces. It works to help people experience the health benefits, both physical and mental, of walking, and to enhance and protect the places where people walk. It is committed to preserving and expanding Public Rights of Way and protecting the beauty of the countryside.

1.3 The Ramblers Association does recognise the threat posed by climate change, and as a responsible body, it supports measures to mitigate this threat by switching to renewable sources of energy, including the use of photovoltaic (PV) technology.

1.4 However, the Association's view is that large scale 'solar farms' should be sited, wherever possible, on industrial parks and brownfield sites, and **not** where they damage valued landscapes. It is our contention that the rolling countryside in this area of Rutland and south Lincolnshire is indeed a valued landscape. The massive size and scale of this project will, despite any mitigation measures, completely alter that landscape - taking away much of the enjoyment for walkers.

2 Specific concerns

2.1 The proposed development will clearly affect dozens of different paths. The area is criss-crossed by a range of PROWs and other routes with public access, including public footpaths, bridleways and Byways Open to All Traffic (BOAT). It also includes a section of the Macmillan Way, an important and nationally recognised Long Distance Footpath.

2.2 In addition to the several kilometres of PROWs close to the development, where there will be some adverse visual impact for walkers, we estimate that at least 7 kilometres of paths will run either directly alongside or actually pass straight through fields with solar arrays (parts of: E123, E169, E182, BrAW/1/1, Uffi/5/1 and the Macmillan Way), with potentially far greater adverse impacts.

2.3 Indeed, the Applicant recognises the significant impact on PROW users in terms of visual effects (Environmental Statement: Ch. 6 - Landscape and Visual). They refer (6.3.60) to the effects on no less than 9 PROWs ‘... *within or bordering the Order limits - the Macmillan Way, E169, E182, BrAW/1/1, BrAW/9/1, BrAW/7/1, Carl/4/1, Uffi/5/1 and E123 (BOAT)*’.

2.4 The Applicant goes on to identify (6.3.61) even more PROWs ‘...*in the wider landscape ...*’ on which there will be ‘... *visual effects to varying degrees - E170, E171, Carl/1/1, Carl/942/1, Carl/4/1, BrAW/3/1, BrAW/7/1, BrAW/7/2, BrAW/8/1 and BrAW/8/2.*’

2.5 So, we can see that this development, unlike most solar farm projects, is not going to impact visually just on the odd path here or there, affecting a few hundred metres at most. This is a project of unprecedented scale, impacting on dozens of different paths, and tens of kilometres of walking routes, across a wide rural landscape. The implications for walkers - and other users - are clearly huge.

2.6 What then, of the mitigation measures the Applicant is willing to put in place to ameliorate the ‘large scale effects’ of the development? These seem to centre on the offsetting of solar arrays (minimum distance of 15 metres either side of a PROW), the planting of new hedgerows (plus infilling of old ones) and woodland to provide screening, and the creation of a number of new ‘permissive’ paths.

2.7 Offsetting, to produce a wider corridor, is certainly a positive step, although it will do little in terms of visual impact. Our concerns with screening are twofold: the length of time needed for adequate hedging to grow, and the fact that even natural screening compromises one of the main reasons why people walk in this area - namely for the fine views over undulating countryside and the positive experience of being in wide open spaces.

2.8 Hedgerow screening is far from being a ‘quick fix’ - indeed the Applicant is all too well aware of this. Referring to vegetation growth rates (Environmental Statement: Ch.6 - Landscape and Visual - 6.2.5): ‘... *assuming a growth of 0.5 metres per year the **partial** screening of PV arrays at 3.3 metres would take approximately 6 to 7 years.*’ This may well be optimistic, as the Applicant goes on to point out: ‘... *however, exact timescales can never be guaranteed - depending on soil type, water availability, maintenance ...*’.

2.9 It would appear, then, that certainly for the first several years of operation, any newly planted hedgerows and trees will provide virtually zero screening of the solar arrays, the perimeter fencing (2 metres high) and all the other on-site equipment. Even after this initial period, the slowly maturing natural screening will (by the Applicant’s own admission) only be partial.

2.10 Limited mitigation and fundamental change to the landscape seem to be recognised by the Applicant when referring to one of the key PROWs that will be affected - E182 & BrAW/1/1 (Environmental Statement: Appendix 6.5 - Amenity and Recreation - Table 3): ‘... *mitigation, ie. offset and planting, will **to some extent** reduce the visual impact to the route, and siting inverters away from it would reduce the potential noise impacts ... **nonetheless the character of the majority of the route would change***

substantially from open views over an agricultural landscape to enclosed views contained by planting - with potential glimpsed views of development'.

2.11 The creation of some 8 kms of 'permissive paths' is being offered by the Applicant as part of the mitigation measures. While new paths, particularly if they improve connectivity, are always welcome, we will end up with exactly the same issues that are going to affect the existing PROWs, ie. walkers being exposed to relentless views of solar arrays for several years as hedgerows develop, and then a partial screening effect which, again, would spoil any panoramic views of the landscape.

2.12 It is also worth noting that one of the proposed permissive paths, the 'East Essendine Loop', will run quite close to the main East Coast Railway Line at one point, making it an unattractive proposition for walkers.

2.13 A final concern we have is the likely adverse impact on users of the PROW network during the construction and decommissioning phases of the development, with the construction phase likely to take approximately 2 years, and the decommissioning period a further 12 months.

2.14 The Applicant (Appendix 6.5 - Amenity & Recreation - 1.5.5) states that '*...during construction the magnitude of change within the solar PV site, affecting E169, E182, Uffi/5/1 and the Macmillan Way, is likely to be greatest given their proximity ...*'. They go on to admit '*...significant audible intrusion and visual effects as a result of construction (E169) ... views of construction highly visible and substantial change to the amenity of this route visually (E182 / BrAW/1/1),*' and '*...visual effects and audible intrusion during construction (Uffi/5/1) ...*'.

2.15 In addition to the negative visual impacts and noise pollution, the construction phase will, of necessity, require some path closures and temporary diversions - with the potential for walkers' safety to be compromised due to increased traffic and general work activities.

2.16 Question marks also hang over the decommissioning phase, whenever that will be. The Applicant (Environmental Statement: Volume 1: Ch.5 - 5.18.7) refers to '*... a high degree of uncertainty regarding decommissioning ...*'. There will be further disruption to the path network with '*...decommissioning including the removal of permissive paths ...*' (5.18.5), although there may well be no return to an open landscape as '*... structured planting (hedgerows etc) would be left in situ when the site is handed back to the landowners*' (5.18.5).

3 Summary

3.1 The Public Rights of Way network in and around the development area is extensive, with several kilometres of paths available to ramblers and other walkers

3.2 These paths are well used by rambling groups - from Leicestershire and Rutland, Lincolnshire and the Peterborough area - and by individual walkers.

3.3 The development, because of its enormous size and scale, will have significant implications for Public Rights of Way, both inside and outside the Order limits.

3.4 One of the key reasons why people walk in this area is because they enjoy the open views across a rolling agricultural landscape. These views will be lost if the development goes ahead.

3.5 There will be considerable disruption for walkers during the construction (2 year) and decommissioning (1 year) phases.

3.6 The proposed mitigation measures will have limited value from the visual perspective, with natural screening taking many years to grow before it even partially hides the swathes of solar arrays. Screening, by its very nature, will inevitably mean the loss of the fine open views for walkers.

In conclusion, Leicestershire & Rutland Area Ramblers (including Rutland Ramblers group) considers the proposed Mallard Pass Solar Farm to be inappropriate for this area, and objects to its development.

Michael Gillon

(Secretary of Rutland Ramblers & Representative for the Leics & Rutland Area Ramblers)