



**Application by Mallard Pass Solar Farm Limited for an Order Granting
Development Consent for the Mallard Pass Solar Project – project ref.
EN010127**

Submission by Mallard Pass Action Group (MPAG)

– unique ID ref. 20036230

**Deadline 2:
Summary of Written Representation (WR)**

15th June 2023

1 Introduction

- 1.1 Mallard Pass Action Group (MPAG) is an Interested Party (ID 20036230) in the DCO Examination.
- 1.2 MPAG was set up in December 2021 during Stage 1 consultation, formed by a group of concerned residents living in villages close to the proposed development. Support for the group has grown organically over the last 19 months as locals have learned more about the extent of the scheme, its sheer scale and the likely impacts on their lives and the environment.
- 1.3 There is a significant level of opposition from within the local community to the proposed development, over 95% of the 1200+ Relevant Representations submitted are against it, and over 2,400 people have also signed a government petition.
- 1.4 MPAG is not opposed to the use and construction of solar panels but believe they are best placed on rooftops and brownfield land, not on productive agricultural land. MPAG is wholly cognisant of the climate change crisis and the rush to net zero, however deeper investigation of the figures presented in this Application raises concerns about the true green credentials of the proposed development.
- 1.5 Aside from the sheer scale, design and location of the scheme, there are a number other key concerns which we do not feel can be simply addressed through mitigation and further design.

2 Executive summary

- 2.1 The submissions draw that analysis together in considering the overall Planning Balance. The conclusion of the analysis is that the order sought within the Application should not be made.
- 2.2 The benefits of the scheme have been substantially overstated on a proper application of policy, both in relation to its contribution to renewable energy provision and in relation to net-zero targets.
- 2.3 Conversely, the substantial harms caused by the scheme have been substantially understated in a number of key respects, on a proper application of both national and recently adopted (in the case of SKDC) local policy. A number of those factors weigh heavily or substantially against the scheme even taken on an individual basis. Together, this combination of harms demonstrates very clearly the inappropriately chosen location for a scheme of unprecedented scale.
- 2.4 A failure to consider any alternative sites, in a proposal of this scale with national significance, is an important shortcoming, especially in circumstances where the initial choice of site location appears to have been based on a poor understanding of the level of constraint provided by the site and the benefits it already offers. The additional failure to consider alternative technologies indicates a fixed position as to what should come forward on the land, rather than an open minded approach both as to location and technology.

- 2.5 The loss of BMV land on the scale contemplated, and on a permanent basis, weighs heavily against the proposed scheme, applying both national and local policy.
- 2.6 Similarly, the nature of extent of the harm to landscape and visual amenity is far beyond what would be necessary even for a solar farm of this size, were it to be appropriately located. The recreational use and enjoyment of PRoW will be severely undermined. MPAG has commissioned a full LVIA from Carly Tinkler which identifies serious shortcomings in MPSF's supporting material, and shows the extent of harm both in landscape and visual amenity terms. That harm should be accorded substantial weight.
- 2.7 The harm to heritage assets, subject to strong legislative and policy protection, also weighs heavily against the scheme. The development will devalue substantially the historic heritage of this deeply rural area. The local area is rich with a large number of designated heritage assets of outstanding quality.
- 2.8 Whilst relying on a significant amount of compulsory purchase provision, the scheme fails to make good the necessary case that there is compelling public interest for it to come forward.
- 2.9 There are a host of other harms that arise, all of which need to be factored in to the overall planning balance in due course. They are set out in more detail in the full Written Representation. As a result of these harms, the proposal has been subject to overwhelming opposition by the local population. Government has recognised the importance of "buy in" by residents to schemes that truly are appropriately located, and sensitively and well designed. The failure of a scheme in that regard undermines public trust and support for renewable energy projects, which it is clearly important to retain. The scheme as proposed will erode public trust in these matters.
- 2.10 Accordingly, MPAG will invite the Panel to recommend that the order should not be made.

3 Sheer scale

- 3.1 The proposed development is on an unprecedented scale, there is no comparison to baseline the level of effects.
- 3.2 The proposed size and location of the 852Ha Mallard Pass Solar Farm (MPSF) would be such that it will dominate the area, and completely change the character and landscape forever, it would be a utilitarian solar farm on a vast industrial scale yet set amongst deeply rural communities and beautiful landscapes.
- 3.3 Its siting is adjacent to 8 villages and in close proximity to over 20. The villages and landscape set the rural character and form the community, supported by the historic market towns of Stamford, Oakham, Bourne and Market Deeping.

3.4 To date no solar farm has been constructed on this scale in the UK and set in such a rural environment. Consideration needs to be given as to how the harmful impacts are likely to magnify compared to a typical smaller installation.

4 Site Selection and location

4.1 The site and its layout was chosen primarily due to its proximity to the National Grid sub-station at Ryhall (400KV). Whilst MPSF's Planning Statement (APP-203) seeks to assess a full range of other criteria it is quite clear they were at best retro-fitted, and mitigated to such an extent to make the development seem palatable. This results in huge compromises with the scheme delivery and also in the way the residents and the environment are affected.

4.2 The location does not provide optimal topography and irradiance levels for placement of panels; the land is currently in arable use, and a stated 41% of the land is best and most versatile, land that is BMV and should not be developed upon in preference to brownfield and lower grade ALC land.

5 Alternatives

5.1 In light of the scale and nature of this project, and the obvious adverse implications it has for many material planning considerations, MPSF and now decision maker are required as a matter of law to address whether alternative sites assessment was properly undertaken.¹ Alternatively, in order for a reasonable planning judgment to be formed on the planning balance, it is necessary for robust assessment of alternative sites in light of the scale of the proposed development.

5.2 No sufficient assessment was undertaken. Alternative technologies were not considered. Alternative sites were not fully considered. There is no adequate investigation of whether land of lower agricultural value could accommodate the scheme.^{2,3}

5.3 Draft revised NPS EN-1 para 3.3.21 sets out the role of wind and solar development and outlines "*the requirement in the Energy White Paper for sustained growth in the capacity of on-shore wind and solar in the next decade*".

5.4 MPSF has not fully considered alternatives in the widest sense whether that is alternative technology, better locations, more efficient panel configurations using less land, etc

¹ Trusthouse Forte Hotels Ltd v Secretary of State for the Environment (1987) P. & C.R. 239; R. (on the application of The Forge Field Society, Barraud and Rees) v Sevenoaks DC [2015] JPL 22 at [81] – [82]

² This was recognized as a substantial failing in Last East of Pelham Substation, DCS ref 400-040-201 (11.5.23) – 49.9MW solar farm

³ This issue has come about, at least in part, due to inadequate early assessment of the extent of BMV on the land.

6 Time Unlimited application

- 6.1 The absence of a time limited consent means the proposal should be treated as a permanent one in relation to adverse impacts. The temporary nature of other proposals has been important to the SoS's acceptance of adverse impacts arising in relation to landscape and visual harm, harm to the historic environment, and other material planning considerations.⁴ None of that logic can be applied to this application.
- 6.2 Twinned with the unprecedented scale of the project, that means that adverse implications of the scale that arise by virtue of the proposed development have simply not arisen in the UK before in relation to solar farm development. Those adverse impacts should be given substantial weight based on the absence of any time limitation and their assessed impact.
- 6.3 This factor is accordingly important in the overall planning balance, and weighs heavily against the proposed development.
- 6.4 According to BRE Planning Guidance⁵ for the development of Large Scale ground mounted solar PV systems, it states "*when development is proposed on agricultural land it is desirable for the applicant to propose a project end date to demonstrate the temporary nature of the solar farm.*"
- 6.5 Planning consent is not time limited in this instance. This has considerable implications for the assumptions laid out in the application across many of the metrics. Surely the efficacy of the application and the metrics provided can only be validated if the application has a clear time limit. How can this application meaningfully now be classed as temporary?
- 6.6 Adopting a proper and robust worst case scenario, which depending on the implications could mean as low as 25 years or higher than 40 years, has clearly not been scoped and calculated within the EIA. This is a serious omission by MPSF and one that has a fundamental impact on the validity of this application.
- 6.7 Accordingly, these adverse factors should weigh heavily against the proposed development. Where substantial uncertainty exists as a consequence of the MPSF's choice to apply for a permanent form of development, those uncertainties should be resolved against MPSF in order to adopt a properly cautionary approach to development on a scale that has simply not been tested.

⁴ For example, at Little Crow issues of BMV loss and landscape and visual harm were substantially influenced by the limited 35 year lifetime of the development: SoS DL 4.50, 4.53, 4.66, 4.75

⁵ BRE Planning Guidance for the Development of Large Scale ground mounted solar PV systems

7 Meeting the energy need

7.1 MPAG accepts in general terms the national policy support for solar farms that are appropriately located and otherwise compliant with national and local policy. The need for renewable energy is a material planning contribution which weighs positively in the balance. However, in this case for the reasons set out below and in the next section, it should only be accorded moderate weight.

7.2 This is in particular because the provision in this location:

- is in conflict with central planks of recently adopted local policy directed expressly towards solar farms
- fails to maximise the efficient use of land; fails to adequately account for its actual capacity
- provides low levels of benefit to the grid for the scale of development required
- fails to maximise opportunities to improve security of supply.

MPSF's case is overstated in a number of important respects.

7.3 South Kesteven District Council (SKDC) Local Plan 2011-2036 Renewable Energy Appendix 3 states *"in balancing the case for and against a proposal the amount of power to be generated is a key factor. Developers will be required to provide evidence based assessments of power generation based on actual yield rather than simply installed capacity"*.

7.4 Not only does MPSF not clearly state an upper limit on installed capacity, but they don't openly articulate the actual energy that will be generated. That is because there are a number of shortcomings with this scheme.

7.5 Solar PV is very inefficient; it only delivers maximum 10% of its stated capacity due to the weather and light conditions. Added to that are further energy losses through panel degradation, distribution losses, grid losses etc.

7.6 To compensate for these inefficiencies also compounded by no battery storage, MPSF is over-planting solar panels, taking up yet more productive agricultural land. On the one hand the grid has to manage the troughs of supply through highly inefficient coal fired power stations, and the peaks through turning off the solar panels wasting potential available energy.

7.7 The point remains that this does not 'meet the energy' need in either the 'greenest' or 'most efficient way'. Rooftop solar both commercially and residentially could help address some of these issues if efficiently designed.

8 Contribution to net Zero

- 8.1 Exploring the green credentials further it is essential to understand whether the proposed development will be carbon positive, carbon neutral or carbon negative. The claimed benefits of the scheme have not been demonstrated.
- 8.2 MPSF's calculations and assumptions do not take into account all of the variables and worst case scenario given the unlimited time of the application. The figures are therefore open to interpretation and there is no clear guaranteed contribution to net zero. The development could be as short as 25 years (the typical manufacturers guarantee period for solar panels) or in excess of 40 years (the period set as a baseline for decommissioning only).
- 8.3 MPSF also do not set their baseline calculations correctly, massively overstating their net zero credentials.
- The real world output of the facility is 28% lower than quoted.
 - The lifetime carbon saving is between 30-50% of that stated.
 - The break-even point for carbon neutrality is 18-24 years instead of 10 years claimed.
 - Due to the expected grid decarbonisation, the facility, never actually saves enough CO₂ to cover the embodied CO₂, even using the advantageous figures presented.
 - The carbon cost of replacement panels has not been considered.
 - Due to grid decarbonisation the embodied CO₂ will not be displaced in the lifetime of this installation which MPSF indirectly allude to via their figures. This questions the whole premise and green credentials of the proposed development.

9 Compulsory Acquisition rights

- 9.1 The necessary compelling case in the public interest has not been made out. Accordingly, there is no legally sufficient justification for the use of CA for the reasons set out below. At no stage pre-application were residents aware and/or clear of compulsory acquisition rights being requested, the justification and subsequent implications. Had this been apparent it would have been raised, challenged and discussed far sooner in the process, that would have been apparent in resident responses.
- 9.2 There is no clear justification for this blanket coverage of roadside residents in Essendine on A6121 for Option 3 cabling.
- 9.3 The public benefits should outweigh the private loss from acquisition – there is no local public benefit.
- 9.4 All reasonable alternatives should be explored – there is no detail surrounding the 3 options.

9.5 The purposes for which the land is sought are legitimate and sufficient to justify interfering with the human rights of affected people – this has not been articulated.

9.6 With the time unlimited application it is also not clear for 'Affected Persons' how long the CA will apply for.

10 Landscape & Visual

10.1 A comprehensive technical landscape and visual assessment has been undertaken by our landscape expert Carly Tinkler. She is a chartered member of the Landscape Institute (CMLI), a Fellow of the Royal Society of Arts (FRSA), and a Member of the International Association for Landscape Ecology (MIALE) with over 40 years experience.

10.2 She is also a Design Council Expert, has been instrumental in the promotion of the landscape-led and iterative approach to development, which has been adopted by local planning authorities and others. She was a contributor to the Landscape Institute (LI)'s Guidance for Landscape and Visual Impact Assessment 1st edition, and a reviewer of GLVIA3. She is a member of LI and Natural England working groups and expert witness for planning inquiries.

10.3 Her assessment concludes *"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."*

10.4 It must also be noted that the proposed development would not deliver any landscape or visual benefits or enhancements, as the LVIA confirms.

10.5 *".....in my opinion, the proposed development would not comply with the requirements of the relevant landscape-related policies and guidance."*

10.6 *"The impact on recreation including walking, riding, cycling and other pursuits is ill judged as to the sensitivity on key receptors. There is a complete lack of understanding of the impacts on peoples' health and well-being, as existing and proposed permissive PROWs are adjacent to and/or surrounded by solar arrays, associated electrical infrastructure, tracks and fencing."*

11 Glint & Glare

The Application material on this topic is not robust. It inappropriately relies on existing and proposed vegetation; overstates the likely mitigation effects of such vegetation in any event; fails to recognize local patterns of gappy hedgerows; fails to adequately assess the implications of users of the PROW; and fails to address adequate mitigation for affected households.

12 BMV assessment

- 12.1 National and recently adopted local plan guidance is strongly against the loss of BMV land for solar farm use: the loss here is manifestly in conflict with central planks of policy. It is vast in size in terms of the loss; the lack of any time limitation means the loss is permanent. These factors weigh heavily in the planning balance against the scheme.
- 12.2 The Application was predicated on a serious misunderstanding of the actual levels of BMV land across the Proposed Development; the site was thus selected on the basis of fundamental misapprehension as to the likely planning balance; the ALC assessment carried out by MPSF is not robust.
- 12.3 The Application fails to properly assess cumulative effects in this regard.
- 12.4 BMV is a key determining factor in the decision making process, so ensuring it is scoped, correctly surveyed and assessed, is critical to the outcome of the application. This is confirmed in the IEMA Land and Soils Guidance which states that: *“The Planning Practice Guidance for the Natural Environment advocates use of the ALC to enable informed choices to be made about planning decisions on the future use of agricultural land. Therefore, the ALC of the site must be known, to determine whether the requirements of planning policy are being met.”*
- 12.5 Draft NPS EN-3 recognises while the applicant’s development may use some agricultural land, applicants should explain their choice of site, noting preference to be on brownfield and non agricultural land. Agricultural land should only be used where that has been shown to be necessary, and even in that case poorer quality land should be preferred (para 3.10.14).
- 12.6 Natural England⁶ determines that the loss of more than 50Ha of BMV land is considered to be a large/major magnitude. The 20Ha threshold is the trigger point for consultation with Natural England on losses of BMV agricultural land. In this instance 216Ha of land is classed as BMV by MPSF.
- 12.7 National and local policy clearly state Best & Most Versatile (BMV) land should not be developed on in preference to lower grade land and brownfield land. The level of BMV land loss is completely unacceptable.
- 12.8 Due to the irregularities in the sampling results and assessment methodologies of the auger and soil sampling tests, both in Phase 1 and 2 testing, it renders the results questionable.

⁶ Natural England Guidance Guide to assessing development proposals on agricultural land 5 February 2021

12.9 The above shows little importance was given to the likely extent of BMV when the site was originally selected. It was chosen primarily for its proximity to the National Grid substation. This is evident by the fact the first ALC survey identified 53% of the solar area to be BMV.

13 Land Use

13.1 The discussion draws together a number of topics which bear on policy compliant and appropriate land use. It builds on the site selection section provided earlier, and demonstrates the agricultural importance and productivity inherent in the Application land. It draws on the increasingly important need for food security (which need not be at the cost of energy security – it is about site selection). The need for food security weighs against the Proposed Development in the planning balance.

13.2 The loss of BMV land here leads to the prospect of cumulative harm as further proposals continue to erode highly productive farmland both due to future proposals emerging, and the risk that the principle of consistency is used as precedent to support losses of the scale and kind contemplated by the Proposed Development. In that context the grossly suboptimal use of land by the Application carries substantial weight against its acceptability in the planning balance, as does the risk of cumulative harm generated thereby.

13.3 Greenfield land, in this case high quality, productive agricultural land, is a finite resource. Nationally there is much debate on this subject with competing demands for arable, livestock, environmental and regenerative schemes, bio fuels etc. With an application that is not time limited, MPSF can give no certainty or confidence when the land can return effectively to arable farming, and its contribution to the National Grid.

13.4 A site requiring 50% of total mitigation does not suggest a site well-chosen. The whole site covers 852Ha, the area to be developed with solar amounts to 426ha (50% of the site), including necessary field margins that increases to 531Ha. MPSF acknowledge the importance of retaining productive agricultural land (239Ha), yet inappropriately still keep it under their control within the site order limits, and are content with allowing 218Ha of BMV land to be lost to solar panels.

13.5 MPSF has inappropriately secured far more land than necessary at the outset as their overriding objective is to utilise the existing capacity at the National Grid Ryhall substation.

13.6 The biggest medium to long term risk to the UK's domestic production comes from climate change and other environmental pressures like soil degradation, water quality and biodiversity. This further strengthens the argument to protect good quality farmland, in particular BMV land.

14 Soil Management

- 14.1 The soils need to be protected from long term damage that could over the lifespan of this development affect their ALC grading, and in the short to medium term affect the hydrology of the area.
- 14.2 The soils need to be in a suitable state to cope with the rigours of construction BEFORE it commences, not fixed afterwards as this will not be as effective in maintaining the valuable BMV soils in good health, or protecting the local hydrology from potential water runoff.
- 14.3 Sowing a suitable grass ley 24 months prior to development will enhance soil resilience and help to prevent soil damage, provided the soil is not worked or trafficked when it is too wet.
- 14.4 The failures to make adequate **guaranteed** provision for soil management and protection are a factor of significant weight that counts against the scheme in the planning balance, especially in light of the scale of the project and the proportion of BMV land affected by the Proposed Development.

15 Flood Risk

- 15.1 National policy in the NPPF and PPG requires that development should be made safe for its lifetime and not increase flood risk elsewhere. Flood risk encompasses risk to both people and property.
- 15.2 The application does not properly consider the effects of **off-site flooding** exacerbated by the construction and operation of the solar farm. Local evidence clearly shows the vulnerability of certain on and off-site areas, the latter being important because it's residential. Climate change will add increasing pressures combined with the inevitable and irreversible effects on the soil of 2 years of construction.

16 Traffic and Travel and construction

- 16.1 The impacts of installing over ½ million solar panels, a new sub-station, 8 construction compounds and all the associated infrastructure are disproportionate; the local environment and community will be too adversely affected by the scale of this project with no discernible local benefits.
- 16.2 The traffic impacts have not been fully assessed or updated in the light of changes during the pre-application to final application stages, and as such the significance of the impacts has been underestimated which would cause significant disruption, damage and harm to the local area and communities.

17 Noise

Both noise and vibration are key concerns of the community especially given the long working hours and short distances from the site for many receptors. Whilst MPSF seem confident of their findings and mitigation they clearly state *“Full details of the exact construction method, plant and duration for the Proposed Development are not available at this stage.”* It follows that MPSF are unable to fully assess all the impacts. It is therefore important for MPSF to be clarify that the noise assessments have been conducted on a realistic worst case scenario.

18 Heritage

- 18.1 Designated heritage assets are strongly protected by statute and national policy. They represent irreplaceable assets. The settings of assets can be central to their value and appreciation. National policy requires great weight to be given to any harm to designated heritage assets. Local policy reinforces the importance of that national policy.
- 18.2 The unprecedented scale of the scheme will have important implications for the settings of designated heritage assets individually and on a cumulative basis, devaluing substantially the historic heritage of this deeply rural area. The local area is rich with designated heritage assets of outstanding quality. The significance of the collection of designated heritage assets in Stamford is hard to overstate, and should be recognized and protected from alien forms of development. The appreciation of the special architectural and historic interest in the area will be permanently and substantially negatively affected.
- 18.3 Accordingly, this factor weighs heavily against the Proposed Development in the planning balance. It must be accorded considerable importance and weight.
- 18.4 In terms of archaeology MPSP states in para. 3.37of the Cultural Heritage Impact Assessment (APP-068) states that *“Archaeological remains dating to the prehistoric period are in abundance within the Site and its environs”*, yet despite all the findings MPSF seem satisfied they can pile drive solar panel infrastructure for 530,000 panels 2.5m into the ground.
- 18.5 It was unclear why their first survey (like the BMV assessment) was semi-detailed, and why their 2nd follow-up survey was too late to accompany the application providing inadequate and untimely information for consultees and Interested Parties to fully comment in their WR and LIR.

19 Biodiversity

- 19.1 Any increase in biodiversity on the Land as a result of the Proposed Development should be accorded limited weight in the planning balance. It is not a justification for a solar farm, let alone one of this

scale. BNG is now a firm expectation of policy, and accordingly merely meeting policy does not command positive weight in the balance.

- 19.2 The biodiversity assessments in the Application are inadequate. The impact report relies too heavily on local record data which is likely to underreport relevant sitings. The survey work is insufficient. Buffers and other mitigation are insufficient and too heavily qualified to ensure proper protection of protected species. The BNG calculation is not robust. It artificially removes woodland areas from the baseline. Nor does it provide any adequate allowance for biodiversity harm that is likely to arise during an extended construction period. The baseline has been incorrectly assessed.
- 19.3 There is a clear risk to SSSI sites during construction, contrary to policy. Sections of important historic hedgerows will be removed. The proposals fail adequately to avoid harm to biodiversity.
- 19.4 The understanding of the effects of large-scale solar farming on biodiversity are still developing. Accordingly cautionary approach should be adopted.
- 19.5 For habitat BNG surely much of the gain can't be claimed as the solar farm is technically 'temporary' and will revert to arable practices upon decommissioning. There is also the issue of how the baseline is calculated given there are a number of areas currently in environmental schemes, so the move to tussocky grassland will contribute a negative impact to BNG in those cases.

20 Decommissioning

The key areas of concern relate to:

- the time unlimited application
- replacement life cycle timing
- returning the site to its prior status
- carbon impact and recycling
- a guaranteed decommissioning bond

21 Consultation process

The consultation process was substantially confusing and confused. It has compromised the ability of interested individuals to have a voice and to make representations likely to improve decision making. In any event, the responses provided demonstrate that if localism matters this proposal should not proceed: The communities are firmly against it⁷, and have properly criticized many parts of MPSF's analysis. The absence of a sufficient process militates indirectly against the weight that can be given to features MPSF wishes to rely upon, because many will not have been as thoroughly tested as they ought to have been, through consultation in the public domain at an appropriately early phase.

⁷ 95.7% of 1206 public and stakeholder group Relevant Representations submitted are against the scheme

22 Community impact and benefit

- 22.1 There are no discernible local benefits to this scheme, only harm to the local community. There are 8 villages adjacent to the site and at least 20 in total that will be negatively affected in some way.
- 22.2 The local community do not believe the addition of permissive paths when they are surrounded by solar panels, or the installation of Interpretation boards, add any value or benefit. The attraction of the rural area, whether for residents, locals or even tourists is the untainted peaceful nature of the environment and the open undulating varied landscape.

23 Socio-economic impacts

- 23.1 The case is unproven and highly likely to be overstated. It should be accorded minimal weight on the planning balance.
- 23.2 Residents running nearby B&B or holiday lets will suffer a loss of business as no one wants to stay next or near to a solar farm, however attractive Stamford might seem to visit; disruption to local tourism from the 2 year construction work will also be harmful.

24 Infrastructure integrity and security

It is important that a project on this scale should not be granted consent (with all that entails for CA etc) unless the decision maker is satisfied it is deliverable. If not, it will not be effective. In considering whether something is properly deliverable it is legitimate to consider the application of the Human Rights Act 1998 provisions both to those who stand to be adversely affected by the proposed development, and those whose rights may not be protected as a result of involvement with the project.

25 Cumulative Impacts

There has been a failure to properly assess and mitigate the cumulative impact of the scheme alongside other planned local infrastructure projects. The impacts on the local communities from the construction activities, particularly in relation to traffic impacts and disturbance could be significant. Equally the regional/national cumulative impacts of the highly concentrated suite of proposed solar NSIP developments on the bread basket of the UK, has far reaching impacts on the future food security within the UK.

26 Mental Health

All the issues raised in this submission have been causing upset and anxiety for residents, affecting peoples' mental health and well-being. Not all residents will share the same concerns, but the combined impact of some of the issues just heightens the impact for them. It is totally understandable given the unprecedented scale of the proposed development how people feel. It is hard to portray in a few words the strength of feeling amongst the local community, but continued

feedback helps inform and shape our knowledge and understanding. **This is not a short term impact just due to construction issues, but a long term issue affecting the rest of peoples' lives and the next generation of families. The harm is so great in this respect that it should not be underplayed in the examination process or in the planning balance.**

27 Conclusion

- 27.1 On analysis it is clear that the limited benefits brought by an unjustified and vast scheme in this deeply rural, location with substantial value in terms of landscape, amenity, heritage, and BMV land do not come close to supporting progression of this scheme.
- 27.2 It has occurred because there has been no proper consideration of alternatives, in breach of legal requirements. Once fixed in its relative geographical place by the Ryhall substation, the reality is that the remainder is retrofitting. It is the only explanation for why so many different types of harm, of the nature and extent explained above, have arisen through the promotion of this scheme. The initial locational decision was apparently taken on an understanding of the land and its surrounds which was (at best) substantially incomplete, and therefore liable to lead to error (as it had undoubtedly done).
- 27.3 **The Panel is invited to recommend that the proposal be rejected.**