

Written Representation by A J Barker Bsc FRICS

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This submission is a follow up to the evidence I gave at the oral hearing on 17th May 2023. As before I will concentrate on my concern that the Mallard Pass (MP) proposal will potentially increase flood risk to Greatford.

To remind you I am a Greatford Parish Councillor but make this representation in a personal capacity. I had intended to provide more detail but many of the issues have been more comprehensively covered by the representations made by Greatford Parish Council (GPC). To avoid unnecessary duplication I have summarised my concerns in respect of 4 documents submitted by MP as follows:

1 APP-086 6.2 Environmental Statement Volume II Appendix 11.5

Despite extensive feedback given to MP during the consultation period it appears that the instruction given to Arcus was to provide a flood risk assessment (FRA) for the DCO application site itself & not to consider any increased flood risk to Greatford. Only brief reference is made of historical flooding in the village at paragraph 1.8.

Paragraph 3 makes the claim that the implementation of the measures set out in Appendix 11.6 for Outline Surface Water Drainage Strategy (OSWDS) will prevent a 'significant' increase in flood risk elsewhere. This raises two key questions:-

(1) How would a moderate increase in surface water run off from the scheme impact on river levels of the West Glen during periods of heavy rainfall and in turn increase flood risk in Greatford. This does not appear to have been addressed.

(2) Will the OSWDS actually work? As set out in some detail in the GPC written representation there are some big question marks.

In conclusion at paragraph 5 MP state that 'vegetation under drip lines and within mitigation and enhancement areas will limit the potential for significant increases in surface water run off'. This is not a positive statement and certainly no guarantee that OSWDS will work effectively.

2 APP 087 Environmental Statement Volume II Appendix 11.6 Water Resources & Ground Conditions

Much of the OSWDS outlined by MP has been challenged in technical detail in the written representation by GPC. Indeed the potential shortcomings of the OSWDS are a very major concern and that flood risk in Greatford will increase.

MP in Table 7 state that based upon certain parameters a baseline surface water run off rate of 5,536 litres per second compared to the scheme with an increase of 14,142 litres per second, an increase of 256%! Despite this MP then conclude that with the implementation of their OSWDS will result in no significant increase in surface water run off. What is meant by 'no significant'? How many additional litres per second will be generated? Has there been a calculation?

MP has made key assumptions in this statement, firstly that grass/vegetation will have established and that no ground compaction has taken place during construction. Both of these solutions need to be rigorously challenged & tested

3 APP 095 Environment Statement Volume 2 App 12.8 Land Use & Soils Construction Methodology

The GPC written representations raise concern that soils on site will be damaged by extensive trafficking of vehicles and equipment for the installation of the solar arrays. If the clay soils are compacted this will lead to a decrease in permeability and infiltration rates. Soils will be less able to absorb excess rainfall and the concentrated run off from the panels will be exacerbated. Another contributing risk factor is the topography of the site which as confirmed by MP in App 086 para 1.5 has heights ranging from 16 metres AOD to 67 metres. This is not a relatively flat site.

4 APP 213 7.12 Outline Soil Management Plan (including outline Excavated Materials Plan)

As set out comprehensively in GPC written reps there is no clear guidance as to when soils will and will not be trafficked by construction machinery during wet weather. Compaction of these clay soils will cause a long term increase in surface water run off and the impact it will lead to an increased flood risk off site.

5 Conclusion

1 MP appear not to have carried out a specific FRA to assess the increased flood risk to Greatford.

2 The written representations from GPC highlight in technical detail the potential for increased surface water run off from the development and subsequent impact of rising river levels in the West Glen which in turn potentially increases flood risk to Greatford.

3 As I made clear at the oral hearing I fully understand the need for the UK to increase its renewable energy capacity but on appropriate sites & locations. However I remain totally opposed to the MP proposal.

My objection is not purely based on the potential for increased flood risk to Greatford but also to;

1 Loss of BMV agricultural land

2 The scale & size of the proposal.

3 The detrimental impact on the local landscape. No amount of mitigation will screen this project totally destroying the rural character of this area of Lincolnshire/Rutland

4 Adverse impact on recreation & wellbeing of local residents

5 Potential for major disturbance to local residents in a 2 year construction period

A J Barker