

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

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D2- Written Representation Summary

1. Mallard Pass Solar Farm (MPSF) will change the character of the area from that of a rural agriculture landscape to that of an industrial generation plant
2. Only 62% of the land within the Order Limit will be used for solar panels and associated equipment. The remainder is required for mitigation, evidence of the unsuitable topography of the area for a solar farm.
3. Guidance on the location of solar farms recommends flat, not undulating land.
4. The topography of the Order Limit is not suitable for a large solar farm. In the PEIR the Applicant states that “views may change from open outlook across agricultural fields to views of MPSF.”
5. Solar is not an efficient method of generating electricity in the UK. The “Plant load factor” of solar energy was 10% in 2020. On-shore wind was 23% and off-shore wind 37%. Additionally, large-scale solar is not the most efficient use of land for energy purposes. On-shore wind generates considerably more GWh/Yr/Ha
4. The Applicant states that no more than 0.5% of the UK land area will be required for solar. The land area of the UK is 60million acres, 0.5% being 300,000acres. The size of the county of Bedfordshire.
5. The Applicant uses many scenarios regarding the life of MPSF, from not specifying it all, to claiming that it might have a life of over forty years. The Applicant uses this to justify a number of different claims as each case demands. This is not a logical, sustainable position.
6. The DCO does not specify a plant capacity for MPSF even though one, 350MW, was given in previous documentation. In not specifying a capacity the Applicant cannot make claims based on the capacity of MPSF.

7. The Applicant claims the output of MPSF would be 350,000MWh per annum. The Applicant's arithmetic is faulty. The number should be 306,600MWh. Allowing for panel degradation, inverter loss and distribution losses the average annual output for the first 25 years would be 253,000MWh - 30% below the number given by the Applicant

8. This represents only 0.08% of the total amount of electricity generated in the UK during 2021.

9. The selection of the site was predicated on the spare capacity at the Ryhall sub-station. Its presence and importance to the Application is stressed by the Applicant.

10. However, it has one significant fault. The Ryhall sub-station does not have sufficient input power capacity to support a battery system. Therefore MPSF it will not be able to save the power it generates when not required by the Grid; this will waste power. It will not be able to download to the grid when light levels are low. The benefit of MPSF to the grid will be diminished.

11. The Applicant intends to address the weakness by "over-planting" solar panels, thereby using more land than would otherwise be the case.

12. Low cost energy is a claim continually made by MPSF without making it clear that the end user will not benefit due to the manner in which the market for electricity operates.

13. On-shore wind is not materially more expensive than solar and this is before the cost of leasing land from farmers.

14. As the Applicant does not state the planned life-time of MPSF nor specify its capacity it is not possible to calculate the contribution of MPSF to net-zero. Indeed, the Applicant states that it can only be calculated at the end of the project.

15. In spite of that the Applicant makes claims. However, the numbers claimed are not accurate. The output of MPSF has been calculated incorrectly as given above and this impacts on its claimed carbon saving.

16. The alternative of on-shore wind was not considered properly, in enough depth. The comments given regarding the unsuitability of on-shore wind are not correct.

17. An alternative solar panel layout, East/West, was dismissed without sufficient investigation even though there is evidence shows that it could be a viable alternative.

18. The Bio-Diversity Net Gain threshold for the project of 10% will not be obtained. A gain of only 4% will be achieved.

19. Following the exit of the UK from the EU the system of farming support is undergoing a considerable change. Under the new Environment Land Management scheme(ELMS) emphasis will be put on ecological improvement. The improvements claimed as a result of the MPSF project would be made, and possibly exceeded by ELMS.

20. The surveys carried out to determine the Agricultural Land Classification to be used by MPSF were not carried out in accordance with the method specified by Natural England. The results cannot be relied on.

21. In any event, areas with Agricultural Land Classification 3a and 3b values are inter-mixed across the site making it difficult to use only 3b land for solar panels.

22. All of the farms involved produce arable crops. Cereal crop production will be lost reducing food security and, if replaced with imports, will have a carbon impact.

23. All of examples of sheep farming are on very small solar farms. Commercial sheep production is not compatible with large solar farms such as MPSF. Even it was possible it would not replace the cereal crops displaced by MPSF. If all the proposed solar farms produced sheep there would be no market for the meat produced. The UK is already self sufficient in sheep meat.

24. MPSF would be of no benefit to the community.

25. Canadian Solar is widely considered to be a “de facto” Chinese company. It has been the subject of many reports linking it to unacceptable practices in China, with particular regard the Uyghur population. Canadian Solar has resisted calls for an independent audit of its operations. In any event there is no possibility of being able to carry out such an audit in China.

26. The Government ceased the involvement of China in building Sizewell C and has banned the use of “TikTok” on Government phones. The involvement of Companies such as Canadian Solar in the construction and operation of any part of the infrastructure of the UK represents a clear security risk.

27. The conclusion must be that MPSF would not bring the benefits claimed. It would, however, industrialise a large area of what is good arable land impacting on food security as well as the lives and well-being of residents.