



**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:
ExA's First Written Questions**

Questions applicable to Mallard Pass Action Group (MPAG)

Q 1.0.11

Paragraph 5.13.8 of the ES [APP-035] sets out the core construction hours which would run from 07:00 to 19:00 Monday to Saturday, and no working on Sundays or Bank Holidays.

b) The Local Planning Authorities and Mallard Pass Action Group are requested to provide their comments on the acceptability of the Applicant's proposed core construction hours.

1. A 12 hour working day is exceptionally long for 6 days a week. The rush hour traffic for residents Mon – Fri will be earlier and later than usual working hours, generating more unwelcome noise, especially on a Saturday.
2. Recreationally there is a cohort of people that exercise themselves/their dogs before or after work. With normal working hours the roads are usually quieter when they do that, but that activity is likely to coincide with workers arriving and leaving the site.
3. Saturday is a particular concern as it is a time a large proportion of the population catch up on sleep and engage in more recreational activities. It won't be very pleasant with the extra noise, traffic and disruption, not just on the roads but in the way it affects the PRow's.
4. Winter is a particular concern as there will be a lighting requirement at the access location entrance points, some access tracks and in the construction compounds. As the local area has little light pollution, that will not only be intrusive for residents and passing traffic, but also for various species. If the workers were doing an 8 hour working day, that impact would be far less.

Q10.0.5

Paragraph 14.4.2 of the ES [APP-044] explains that “...Furthermore, economic modelling identifies that the study area (Rutland and South Kesteven) is a popular destination for visitors, particularly for countryside pursuits like walking. Within the Rutland and South Kesteven Local Plans employment and economic activity are high on the list of priorities, and both local authorities have dedicated tourism teams promoting the area.”

a) Is any evidence available that quantifies how regularly the Public Rights of Way (PRoW) within and adjacent to the Order limits are used

b) Are there any particular routes or circular walks or rides that are promoted for recreational use by residents or visitors?

1. Many of the members of MPAG have lived and worked in the area for 20, 30 and 40 years +. Since Covid they have seen a marked change in recreational behaviour and people accessing the countryside more. People are venturing out for exercise, fresh air, a way to connect with nature and also the opportunity and likelihood of meeting like-minded people.
2. Whilst visitor attractions were off-limits during the peak of the pandemic, looking for alternative means of recreational activity, people began to realise how much was on their doorstep to enjoy. Once over the threshold most people haven't looked back and continue to enjoy walking locally and exploring slightly further afield from home.
3. A particular boost to the local area was the publication of 3 walking guides editions during 2020 and 2021 – “Will's Walks 21 rambles around Stamford and Rutland”. The first edition foreword from Mary Bremner, editor stated “When talking to readers of Active magazine we often get asked when we are going to do a book of Will's Walks. So we have listened and got together with Will to bring this book to you”

Active magazine is a glossy lifestyle magazine free of charge to the public and available through many local retailers and cafes in Stamford and around. It is a 'pick up and takeaway' magazine and for years it has published a walk and a cycle route each month. Readers always looked forward to the next month's edition, but unless extremely organised the magazine was eventually discarded. That's why the printed guide collating the walks has been such a success. (APP: CT-B_Extracts from Will's Walks in the appendices of our Written Representation collates local walks from all 3 guides relevant to the proposed development.)

4. Local grants promoting community well-being projects enabled Braceborough Village hall to transform and open up the front garden with smart paving and comfortable park bench seating. This has encouraged walkers and cyclists passing through, some using a Will's Walk route (or variation on a theme), to pause, relax and refresh.



5. Residents and locals to the area are more inclined to make up their own network of walks encompassing PRoWs and quieter roads.
6. Tourists are most likely to come to the area to visit the historic market town of Stamford, take in Burghley House or head across to Rutland Water. If staying in local accommodation are then likely to walk some local PRoWs.
7. There is no way to quantify the extent a path or route has been used other than by the number of people you meet along the way. People are attracted by pleasant tranquil surroundings, the wildlife and the friendly local communities they stop and pause to chat to. There is no doubt that faced with walking routes dominated by a utilitarian solar farm industrialising the landscape that people will avoid the area and go elsewhere. This will have a very isolating effect for the residents left, also wondering how best to avoid what will become 'no-go' areas.
8. MPAG has identified a number of routes through the Examination process.
 - a. REP1-016 'Suggested locations for site inspections' (deadline 1) identifies 4 full circular routes covering the entirety of the proposed development. 2 of them pick up the National Trail, the Macmillan Way.

b. MPAG's Written Representation (deadline 2). Carly Tinkler, landscape expert identifies through her full report and appendices routes along roads, BOATs, bridleways, public / permissive footpaths typically and frequently used by locals and visitors, i) in cars, ii) on bicycles, iii) on horseback, iv) on foot and v) by bus.

1. Landscape & Visual Review full report – P15, Chapter on Recreation and Access

2. Appendices from the MPAG WR

a) APP:CT-A_Plan C: Map 1 Routes residents

b) APP:CT-A_Plan D: Map 2 Routes visitors

c) APP:CT-B_Extracts from Will's Walks (as above)

Questions applicable to Interested Parties

Q1 2.1

-Paragraph 4.3.9 of the Applicant's Statement of Need [APP-202] refers to the then unpublished 'Skidmore Following its recent publication on 13 January 2023 as 'Mission Zero Independent Review of Net Zero', comments are invited on any implications this review may have in respect of the consideration of the Proposed Development.

Answer:

The publication included an number of points relevant to the Proposed Development and signalled changes in direction that should be considered.

1. The need for a "solar rooftop revolution" was highlighted. Whilst not directly impacting on the Proposed Development, a greater emphasis on rooftop solar would reduce the need for ground mounted solar particularly those schemes such as the Proposed Development which should not be approved.

Ref. Executive Summary page 9. Accelerate Solar: Full-scale deployment of solar including a rooftop revolution to harness one of the cheapest forms of energy, increase our energy independence and deliver up to 70GW of British Solar Generation by 2035.

2. On-shore wind is given more prominence in the report than hitherto. The Applicant should have considered this alternative in greater depth rather than dismissing it out of hand. Local community support is stressed as is the fact the onshore wind is one of the fastest lowest cost solutions to rapid delivery of Net Zero.

Ref. Executive Summary page 9. On Shore Wind: Pave the way for on-shore deployment, working closely with with communities to deliver local benefits.

Ref: Mission: Point 269 page 92. Now is the time to turbo charge a drive towards greater on-shore wind provision.

3. The need for local input and community benefits is made in order to improve transition to Net Zero. The Proposed Development brings no community benefits. Indeed, the opposite is the case

Ref: Point 31 page 27. Local action is key to delivering net zero in the cheapest and most effective way possible. Taking a more locally led, placed-based approach can deliver a net zero transition with more local support, better tailoring to local needs, and bringing economic and social benefits.

Ref: Table page 93. There is a lack of awareness of the guidance on community benefits. Government to set out a framework for community benefits, acknowledging that these will be specific to the local situation.

4. Better emphasis on storing energy, such as with batteries, emphasised. The Proposed Development would have no means of storing energy thereby reducing its efficiency, value to the Grid and occupying more land than would otherwise be required.

Ref: Point 11 page 22 How we generate electricity, with a massive increase in the use of renewable energy technologies like wind and solar - as well as upgrades to our grid and a much greater emphasis on storing energy like using batteries.

5. The opportunity more new technical jobs is made, but not as far as solar is concerned. Solar will not contribute to those jobs as virtually all panels are developed and manufactured in China.

Point 137 page 57 New manufacturing and materials - the new technologies (e.g. wind turbines or batteries) will need to be built, often requiring highly-technical skilled work forces.

Ref: Point 171 page 67 We must double down on production of renewables, nuclear hydrogen and other low carbon fuels to give our future energy system a homegrown, secure platform.

6. The report highlights the need for secure and resilient supply chains. The involvement of Canadian Solar in owning and operating the Proposed Development, with its alleged close links to China, is seen by many as a security threat.

Ref: Future Energy Security page 69. The Net Zero transition will only succeed if it is underpinned by secure and resilient supply chains. This security is threatened when only a small number of nations dominate the sourcing, production and processing of minerals and materials.

Q1 2.6

- a) Provide a summary of the effect upon, and the implications for, the Government's Net Zero and climate change commitments should the Proposed Development not be implemented.
- b) Taking account of the availability and capacity of other existing points of connection to the NETS or local Distribution Network (both in the region and nationally), what evidence is there of opportunities for other solar projects to come forward in other locations that would be likely to fulfil the Governments Net Zero and climate change commitments in the absence of the Proposed Development?

Answer:

1. MPAG's Written Representation explores the subject of 'Meeting Net Zero' in Chapter 7. On the face of it, as a solar farm is a renewable energy source we had initially thought it would be carbon negative. However scrutinising the details in MPSF's Climate Change chapter 13 it would appear the scheme is not carbon negative and there are considerable issues with it

The claimed benefits of the scheme to net zero have not been demonstrated. Due to the expected grid decarbonisation, the facility, even according to MPSF's figures, never actually saves enough CO2 to cover the embodied CO2. Therefore using MPAG's recalculations with the necessary corrections to output and assumptions, the situation is made even worse.

The IPCC figures (Figure 14 in the WR) show lower lifecycle costs for rooftop solar vs utility solar, especially when looking at higher end max percentile scenarios. With utility solar panels almost certainly being made in China, using dirty inefficient fossil fuel power stations, this is the reason the IPCC emissions levels are so high for utility solar.

IPCC Technology-specific Cost and Performance Parameters Annex III

Table A.III.2 | Emissions of selected electricity supply technologies (gCO₂eq/kWh)

Options	Direct emissions	Infrastructure & supply chain emissions	Biogenic CO ₂ emissions and albedo effect	Methane emissions	Lifecycle emissions (incl. albedo effect)
	Min/Median/Max				Typical values
Currently Commercially Available Technologies					
Coal—PC	670/760/870	9.6	0	47	740/820/910
Gas—Combined Cycle	350/370/490	1.6	0	91	410/490/650
Biomass—co-firing	n.a. ¹	—	—	—	620/740/890 ²
Biomass—dedicated	n.a. ¹	210	27	0	130/230/420 ²
Geothermal	0	45	0	0	6.0/38/79
Hydropower	0	19	0	88	1.0/24/2200
Nuclear	0	18	0	0	3.7/12/110
Concentrated Solar Power	0	29	0	0	8.8/27/63
Solar PV—rooftop	0	42	0	0	26/41/60
Solar PV—utility	0	66	0	0	18/48/180
Wind onshore	0	15	0	0	7.0/11/56
Wind offshore	0	17	0	0	8.0/12/35
Pre-commercial Technologies					
CCS—Coal—Oxyfuel	14/76/110	17	0	67	100/160/200
CCS—Coal—PC	95/120/140	28	0	68	190/220/250
CCS—Coal—IGCC	100/120/150	9.9	0	62	170/200/230
CCS—Gas—Combined Cycle	30/57/98	8.9	0	110	94/170/340
Ocean	0	17	0	0	5.6/17/28

Notes:

¹ For a comprehensive discussion of methodological issues and underlying literature sources see Annex II, Section A.II.9.3. Note that input data are included in normal font type, output data resulting from data conversions are bolded, and intermediate outputs are italicized.

² Direct emissions from biomass combustion at the power plant are positive and significant, but should be seen in connection with the CO₂ absorbed by growing plants. They can be derived from the chemical carbon content of biomass and the power plant efficiency. For a comprehensive discussion see Chapter 11, Section 11.13. For co-firing, carbon content of coal and relative fuel shares need to be considered.

³ Indirect emissions for co-firing are based on relative fuel shares of biomass from dedicated energy crops and residues (5-20%) and coal (80-95%).

⁴ Lifecycle emissions from biomass are for dedicated energy crops and crop residues. Lifecycle emissions of electricity based on other types of biomass are given in Chapter 7, Figure 7.6. For a comprehensive discussion see Chapter 11, Section 11.13.4. For a description of methodological issues see Annex II of this report.

Figure 14: IPCC technology-specific Cost and Performance Annex III

Rooftop solar is also more carbon friendly as the energy generated is used directly requiring no grid rebalancing (usually supported by inefficient fossil fuel power stations), energy losses are also minimal unlike utility solar which loses energy through inverter losses, panel degradation, grid outage losses and distribution losses.

On May 10¹, the grid carbon was 33g/KWh (.033te/MWh) - this is lower than the MPSF stated lifecycle carbon of 48g. Therefore MPSF will not make any CO2 savings at all now, as the grid is now cleaner than their baseline assumption.

2. In addition to the carbon calculations it would seem MPSF are over-stating their contribution to meeting the energy need. MPSF's Statement of Need 8.8.20 contains the following, "*Proposed Development, as a leading large-scale solar scheme in GB, represents 1% – 3% of the additional solar generation capacity projected in National Grid's Future Energy Scenarios which are compatible with Net-Zero.*"

MPAG disagrees with this statement, the maths is quite straightforward. The additional capacity required by the Government is 56GW (Total of 70GW required less 14GW already in operation). On that basis at a capacity of a claimed 350MW, MPSF would contribute only 0.625%. The over-claim made by the Applicant with regard to energy has an impact on the extent to which the development would contribute to net-zero.

¹ UK hits major clean energy milestone. See National Grid website/journey to net zero stories

Q11.0.12

Section 5 of the oCTMP [APP-212] proposes the appointment of a Transport Coordination Officer who will be responsible for monitoring the CTMP and ensuring that the mitigation measures are sufficient. The Traffic Coordination Officer will report to a Traffic Management Working Group. The Group is proposed to consist of, but not be limited to, the following:

- National Highways
- Rutland County Council
- Lincolnshire County Council
- South Kesteven District Council
- Great Casterton Primary School and Great Casterton College
- Essendine Parish Council
- Ryhall Parish Council
- Stamford Parish Council

Which other organisations could be beneficially included in the Traffic Management Working Group? Please provide justification as required.

Answer:

1. Great Casterton Parish Council (route 1 inbound route for HGV/AiL). The junction requires street works to enable the AILs to get through. The question is with 12 hour working days, is it realistic to assume the HGV drivers will only work 6 of those 12 working hours. Great Casterton is liable to be affected by both a housing project in the village and other housing projects in Stamford (Quarry Farm and Stamford North) Stamford don the pavement across the busy junction.
2. Toft cum Lound and Manthorpe Parish Council (route 3 outbound for HGV/AiL)
3. Little Casterton Parish Council including Toll Bar
4. Greatford Parish Council, Carlby Parish Council – with no weight restrictions in place both Carlby and Greatford will be affected by LGV and HGV traffic that doesn't conform to the traffic plan requirements. Greatford in particular is used as a cut-through east/west. They need to have a voice and be able to liaise with the TCO.

Remaining questions

*“The introduction to the ExA questions includes *Column 2 of the table indicates which Interested Parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.*”*

Q1 3.5 to The Applicant

Paragraph 3.1.11 of the Site Selection Assessment [APP-203] states that the general topography of the area immediately surrounding the Ryhall substation is gently undulating and therefore this makes a particularly suitable site for solar.

Please explain with appropriate evidence why it is particularly suitable and how the topography has influenced the proposed site layout and choice of fields used for the Proposed Development?

Answer:

The topography for the siting of the substation is far from ideal. In fact fields 18 and 19 can not only directly be seen from the A6121 and the rear gardens of a number of residents of Glenside Crescent. The fields slope downhill both toward the railway line in Essendine and also west towards A6121. Due to the topography screening will be impossible, as clearly seen by a local resident watching agricultural machinery working the field last summer (apologies no photo).

They can also be seen as far away as Carlby Road and from the railway end of the BrAW/1/1. The easy identification is because there is a huge mound of hardcore, probably not as high as the 13m proposed substation, which can be seen from all around.

Unlike the existing Ryhall substation which is at least hidden from Essendine, no attempt has been made to site the new substation in a less sensitive area. However it would appear that the proposed planting and screening for the Ryhall substation along the Uffington Lane has not been effective even though it was a condition of the planning consent.