

**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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Deadline 2: Written Representation

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Appendix A: Relevant Representation

1 Background

- 1.1 At the beginning of this process most residents had not heard of an NSIP and probably knew little about solar, myself included. However over the last 19 months I have been on a crash course investigating all the principal issues and gaining an understanding of all relevant government policies and the NSIP process. Whilst I don't profess to be an expert in any one subject, what I have learnt through extensive reading and research, networking, listening and engaging with all sorts of people, has enabled me to become better informed and more balanced in my opinions. I draw on those learnings to arrive at the following conclusions in this Written Representation.
- 1.2 I have lived in the local area for 25 years so I believe it gives me a great head start in appreciating and understanding some of the likely impacts.
- 1.3 As co-author of the Mallard Pass Acton Group (MPAG) Written Representation, I concur with all their findings and conclusions. For the purpose of this Written Representation I am focussing on more specific personal impacts and my principle values as outlined below.

2 Executive summary

- 2.1.1 **Principal values**
- 2.1.2 **Land Use.** Achieving one important objective to sacrifice another makes no sense when both are of equal national importance i.e. sacrificing all productive (not just BMV) agricultural land to generate energy from ground mounted solar panels. There are alternative renewable sources and other ways of delivering solar energy on brownfield sites and on rooftops.
- 2.1.3 **Carbon credentials.** Whilst motivated to hit Net Zero, we should not assume any renewable development is necessarily fully green, especially when we consider the origin of manufacture has a pivotal impact on the life cycle emissions. The carbon emissions calculation, which does not consider all the inputs, shows more carbon being emitted to the environment in the short term. The total actual lifetime CO₂ reduction from the grid is lower than the lifetime CO₂ of the facility. The MPAG Written Representation explains this in more detail.
- 2.1.4 **Biodiversity.** BNG in this instance seems quite easy to achieve if you compare the starting point of having arable land as your baseline and also all the woodland blocks being removed from the Order limits. It is my belief there is a role for biodiversity benefits to sit alongside arable food production at the same time. The latter should not be displaced and replaced with solar panels when there are more suitable land usage options on brownfield sites or much lower grade land.
- 2.1.5 **The environment.** We have a responsibility to manage the environment sensitively. 530,000 solar panels spread across greenfield land can surely not be described as rural diversification, it is

industrialisation of the countryside. Unless a solar installation can be sensitively and discreetly placed it potentially creates more harm than benefit.

2.1.6 **Sense of place and community.** Places are about people, and people are about communities, if you take away components of the relationship such as the countryside amenity and the landscape, the whole relationship breaks down and the benefits are lost.

2.2 Personal impacts

From a personal perspective the following will be assessed:

- Scale & location
- landscape and visual
- residential amenity
- recreational amenity
- construction effects – traffic, noise, working hours
- compulsory acquisition

2.3 Please note my Relevant Representation in Appendix 1 summarising my key issues and concerns.

3 Scale and location

The over-riding impact that struck me from day 1 pre-application was the sheer scale of the proposed development. There are quite a number of considerably smaller solar farms around the country, but nothing in the UK to match or compare this to. Any development, particularly on greenfield land, needs to be contained and sensitively placed to have the minimum harm and impacts. That is just not possible to do when the proposed development is so close to local 8 villages and towns, completely changing the local character of the area. Locally there is a small solar farm in a disused quarry at Ketton, just west of Stamford, very few people realise it is there. Has the Applicant truly investigated all the brownfield sites, or is it just easier and cheaper to select land adjacent to Ryhall substation and retrofit all the other design elements of the scheme?

4 Landscape and Visual impact

4.1 Before I bought my current property I used to use Carlby Road regularly to reach some friends in Market Deeping, I always used to admire the landscape. It was as if I had taken in a huge breath of fresh air and sense of 'feel good' as I drove along that road. So when I had the opportunity to buy a property there, which also had land for my horses and a bridleway, I grabbed the chance with open arms. Never did I envisage it could be turned in to an industrial solar plant, effectively losing everything 'greenfield' about the area. I spoke to Planning Officers at the time and they assured me there would never be any developments of that kind in this area.

4.2 Visual receptor group 4 and 5 (Carlby Road and Braceborough Wood area) predominantly affects those residents living and travelling back and forth across the east part of the site. Carlby Road is the vital link to villages like Braceborough & Wilsthorpe, Greatford, Barholm, Stowe and further east to

Langtoft and Baston near the A15 which in turn connects Bourne to Market Deeping towns and Market Deeping to Peterborough. The landscape today along Carlby Road enjoys substantial large open vistas South, West and North, other than a small interruption for Braceborough Wood facing north. It determines the whole character of the area.

4.3 The assessment of VRG 4 and 5 the Applicant seems to overlook several things:

- 4.3.1 It is both inappropriate and impractical to try and screen off field 36. Ultimately the ugly rear of infrastructure will be the new landscape, as despite however many trees are planted, the new industrial-scape will dominate this particular area.
- 4.3.2 Turning off the A6121 junction heading down Carlby Road to Greatford, the field parcel on the corner is not part of the order limits. The Applicant is not in control of the screening for the first 1/2 mile up to the entrance of Park farm. Not only will the solar panels be seen from the main road junction looking across field 29, but field 29 and 30 will also be very visible down stretches of Carlby road, as will be field 36 adjacent to the bridleway BRAW1/1. Also for 6 months of the year trees and hedges will provide limited screening.
- 4.3.3 It assumes no interconnectivity of footpaths and walking routes assuming all routes other than BRAW/1/1 won't be affected, that is just not the case. People walk/cycle/ride around the entire area, including Carlby Road and BRAW/1/1. MPAG's WR outlines this in maps in their appendices as well as in recently submitted walking routes for the next site inspection.
- 4.3.4 To characterise the changes of low magnitude and going to slight and minimal respectively yet still being adverse cannot be the case. The MPAG landscape and visual report unpicks some of the methodology anomalies.
- 4.4 Para 6.5.65 of Chapter 6 Landscape & Visual (APP-036) states "*Embedded mitigation would be provided through the planting of a new hedgerow along a historic field boundary to the north of the eastern parcel to diminish the visual effects between year 1 and 15 of operation. By year 15 of operation, the effects would reduce to Slight (Not Significant) and Adverse.*" This will not be the case as the magnitude of change will be **huge** to the character and structure of the landscape present today. This is open undulating landscape offering long vistas.
- 4.5 Perhaps the biggest impact on the visual and landscape character is the entirety of all the elements of a solar farm - the mounting structures, fencing, signage, CCTV, inverter/transformer containers, hard tracks etc. The perception is rows of glass panels, the reality is very different. This area will become an industrial landscape with 530,000 panels spread across the 852Ha.
- 4.6 Glint & glare is a particular concern for horse-riders and cyclists. Motorists are more likely afforded some protection via their windscreens and for drivers the impact would be more momentary.

5 Residential amenity

- 5.1 The Applicant describes in their visual assessment “*Properties along Carlby Road are also relatively elevated with longer views possible southward over the Order limits although views northward are screened by Braceborough Wood.*”
- 5.2 “Two, 2 storey cottages set back slightly to the north of Carlby Road. Principal aspect is south (front) / north (rear). Open views southward over rolling agricultural landscape. Land falls away southward to West Glen River corridor and East Coast Mainline Railway. Essendine is visible to the west of view.”
On a clear day I can see 2 miles due South to fields south of Uffington Lane/Essendine Road; 1.5 miles across to the new substation location; due West to fields the far side of the B1176. The electricity pylons across the site, the hard core mound in field 19 housing the new substation, and the rape seed crops this year, have enabled me to correctly identify which fields I can see and how far the solar will be visible to. This demonstrates the character of the landscape which is particularly open and undulating across the NE section of the site.
- 5.3 From living room and bedroom upstairs the views are extensive as described above, especially in the autumn/winter months when there is minimal screening from hedges. Field 36 is one of the biggest on the site with open vistas. The Applicant describes the magnitude of change as ‘low’ and significance of effect as ‘Slight’. It is unclear how the Applicant arrived at these conclusions.
- 5.4 There is also an anomaly in that different application documents have different mitigation strategies.
- 5.4.1 The RVIA states “*New **hedgerow** planting is proposed both along the southern edge of Carlby Road and also along the northern edge of the Solar PV Site, the latter linking two existing woodland blocks.*” The latter won’t be able to connect as there is the buffer between the bridleway and the PV arrays, made worse by fencing.
- 5.4.2 However, Figure 1 (figure 6.11 from the Green Infrastructure Strategy Plan (APP-173) as illustrated below) shows new **tree belt planting** not hedgerow as described above.

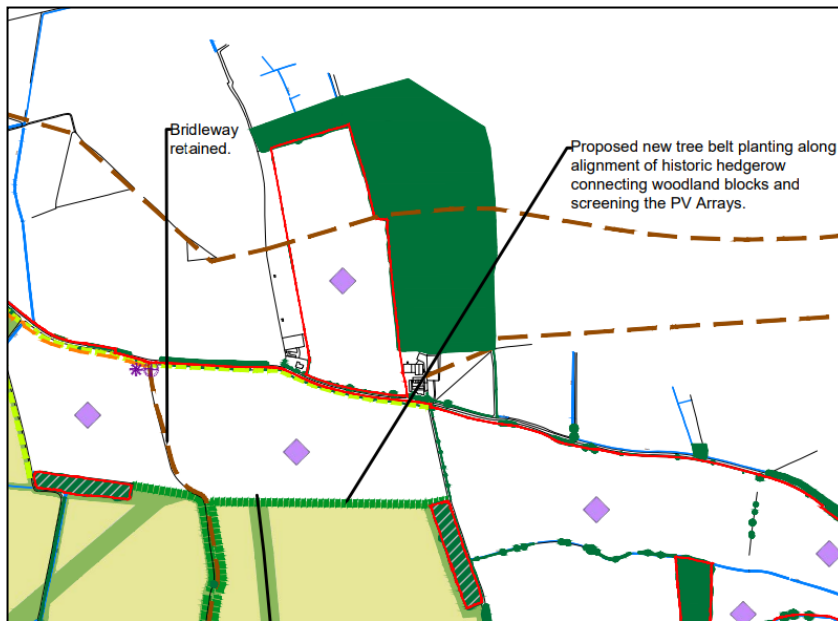


Figure 1 Green Infrastructure Strategy Plan

5.4.3 Planting a tree line is not in keeping with the typical field boundaries and open landscape. The landscape has such far reaching vistas that neither a tree line nor a hedgerow will be effective unless up close to the solar arrays. The lifespan of the development will determine how effective and for how long the 250-300m set-back mitigation will have a screening impact for, especially with respect to tree planting. The lifespan could be as low as 25 years if the technology is superseded, conversely it could be up to 40 years and beyond. Growing a proper thicket hedge would be more appropriate, and if done properly would offer more screening value in the winter months compared to a tree line. It would also replace what used to be a historic hedgerow between those tree belts.

5.5 If this Application were to be approved I would ask that the Applicant sensitively consider the point above and confirm their proposed mitigation. This was raised in my Stage 2 consultation but never received any response from the Applicant.

6 Recreational amenity

6.1 Life is not just about the recreational activities, but everyday living. Such a fundamental change to the area will touch every facet of my life and I'm sure many more people in the area, albeit in slightly different ways. The proposed development needs to consider the impacts on people generally, families, friends, local communities. They are the beating heart of everyday life, put up barriers and villages and people become fragmented and isolated. They need to consider the impacts on physical and mental health and strive to create better places to live and work than the opposite, out outlined in SKDC's Local Plan RE1 Renewable Energy.

6.2 It's hard to explain the feeling in the 'pit of my stomach' to think I will have to drive, walk, horse ride and cycle past hundreds of hectares of solar panels whether along Carlby Road, adjacent local roads

and PRowS. That sense of well-being and freedom of the open countryside will completely disappear, there will be no escaping it, and there will be no pleasure in using the PRowS.

- 6.3 The Applicant seems to have omitted any information about what happens to the permissive path when they reach 20 years when officially it would become a PRow. Would they plan to temporarily close it, what planning conditions will be laid down?

7 Agricultural (and BMV) land

- 7.1 Whilst I did not know what BMV land was before Mallard Pass was launched, what I have always appreciated is the importance of growing our own food, being resilient and protecting our food security as a nation. I also feel we have a responsibility to support poorer countries, with the Ukraine/Russia war it has shown how vulnerable we all are globally to these shocks, whether political or climate based. Living adjacent to miles of arable land, watching it go through the seasons and finally be harvested, only serves to strengthen my opinion that that is what the land is there for.
- 7.2 There is a very good reason BMV land is afforded protection in many areas of government policy at both a national and local level. That is because it is finite. With the effects of climate change, rising sea levels and rising populations we need to be more productive to stand still. Yet we know that highly intensive farming is not necessarily good for the environment, so growing yields may not be the answer. Government environmental schemes and associated subsidies are designed to try and bring some balance into system. However If we carry on taking land out of arable production primarily, at scale, to deliver the balance of the 70GW solar target, an area in the UK as big as Bedfordshire will be lost to solar panels and infrastructure.
- 7.3 I have always been an analytical person and therefore painstakingly went through the application documents and consultant's reports to identify the weaknesses, anomalies and inconsistencies. It is of no surprise when the application was finally submitted that the Applicant would try and find a way of downgrading the 53% BMV on solar land to 41%. The information provided by the Applicant is not robust for all the reasons that MPAG outline in detail in their Written Representation. There is a high likelihood the level of BMV is higher than stated; the site location has only been chosen due to the grid connection. All the land is productive, the difference between grade 3a and 3b is marginal, such that all the land should be regarded as a valuable asset.
- 7.4 The applicant talks at length about the 420Ha required for the solar area, what they only raise fleetingly is that the land required to put up all the infrastructure taking account of the margins actually requires 531Ha, 26% more land.
- 7.5 Were the Application to be approved what certainty do I have that field 37 north of Carlby Road and part of field 36 south of Carlby Road will definitely remain in arable production? The concern I have is that landowners might not need to work from a financial perspective when the lease arrangement is in place. The land may just be left to its own devices and this would reduce the contribution to

food production even further. My understanding is that if the land is being leased the farmer would not be able to duplicate earnings by entering into environmental schemes?

8 Biodiversity/environmental concerns

- 8.1 From experience of living in and amongst the natural environment, I feel there is an under-estimation of the wildlife recorded either because desk based information is out of date and/or because the surveys conducted were limited relative to the size of the site. My partner used trail cameras all over our small holding and there is a staggering amount of wildlife that comes out at night that would not present itself so readily during the daytime and therefore has not been recorded.
- 8.2 Along the way the Applicant's Figure 7.7 Location of badger setts (APP-190) dated 22nd Nov 2022 was unwittingly made available initially with the application documents. It shows badger setts within the site and ignores badger setts adjacent to the site. There are 19 active badger setts identified on-site on the map, locals if they looked at this map would identify **many more** areas. To displace all these badger setts and relocate elsewhere does not seem a practical solution and would potentially cause harm to this protected species.
- 8.3 Brown hares are prolific in the area; my concern is how restrictive the fencing will be for them. When in flight mode a brown hare will go in whatever direction to get away from its perceived predator. The likely outcome is the hares will rush into the fences and be driven across the local roads causing injury and death. Badger gates may only be effective if they happen to be in the vicinity of one.
- 8.4 To achieve 10% biodiversity net gain is relatively straightforward when replacing arable land with grassland, however given the remit of the land is to produce food, it was never being measured on that basis. It has been shown through government environmental schemes that farmers can deliver BNG without having to turn their land over to solar panels. The reason for landowners and the Applicant choosing a solar farm is purely commercial, BNG should therefore not carry much weight in the planning balance.
- 8.5 If the Applicant is passionate about its green credentials and the environment, why are they relinquishing responsibility for all the tree/woodland areas within the Order limits? These areas, no longer within the Order limits, will be akin to isolated islands with little incentive for the landowner to do any maintenance or consider connectivity of habitat corridors. How will the landowner even reach these areas? This is a change from Stage 2 consultation with no explanation about the change and why these woodland areas have been abandoned.
- 8.6 Regarding the BNG calculation I would ask that the Applicant's baseline data and calculations are shared and verified. If the tree areas are not part of the order limits, despite being enclosed by it, the baseline for trees will be incredibly low, therefore making it very easy to show a net gain, not exactly a fair representation or proper baseline.

8.7 It has to be questioned whether the BNG claimed as a result of grassland being in place can be counted. The Applicant describes this development as 'temporary' and therefore the BNG gain is temporary technically. The grassland will be removed upon decommissioning and returned to arable rendering the gain unclaimable.

8.8 Para 3 of the Environment Act 2021 states and comes into force November 2023:
"The condition is that any habitat enhancement resulting from the works referred to in subparagraph (1)(a) will, by virtue of—
(i) a condition subject to which the planning permission is granted,
(ii) a planning obligation, or
(iii) a conservation covenant,
be maintained for at least 30 years after the development is completed."

What will happen if the Applicant only operates the solar farm for 25 years?

8.9 Felling or lopping of trees and removal of hedgerows. As outlined in the draft DCO para 38 (APP-017):
"(1) The undertaker may fell or lop any tree or shrub near any part of the authorised development or cut back its roots, if it reasonably believes it to be necessary to do so to prevent the tree or shrub from—
(a) obstructing or interfering with the purposes of the authorised development or any apparatus used in connection with the authorised development;
(b) constituting a danger to persons using the authorised development;
(c) obstructing or interfering with the passage of vehicles to the extent necessary for the purposes of construction or decommissioning of the authorised development."

The wording of this grants an open license for the Applicant to cut down any trees, a concern given the objective should be to deliver environmental benefits, not take them away. Has the removal of these hedgerows and trees been taken into account in the BNG calculations?

9 Traffic

9.1 Just based on the construction period alone the proposed development is not appropriate due to the impacts on local roads and residential areas from the HGV and AIL loads. The 2 routes determined to enter and leave the site via route 1 and 3 respectively are just completely impracticable and will not be adhered to. **The distance and time taken to drive the routes is prohibitive.** Currently with some projects going on locally HGV drivers are breaching their S106 conditions. When stopped in Greatford village by concerned locals and asked why they are travelling this route, they say because they can, there are no weight restrictions and no one is tracking them. The same would be the case for the Applicant's contractors. There is no way to enforce route 1 and 3. You only have to look at the map in Figure 2 below for perspective. The 852Ha site looks tiny outlined in red compared to the proposed routes HGV and LGV drivers will be told to take which are circuitous and impractical.

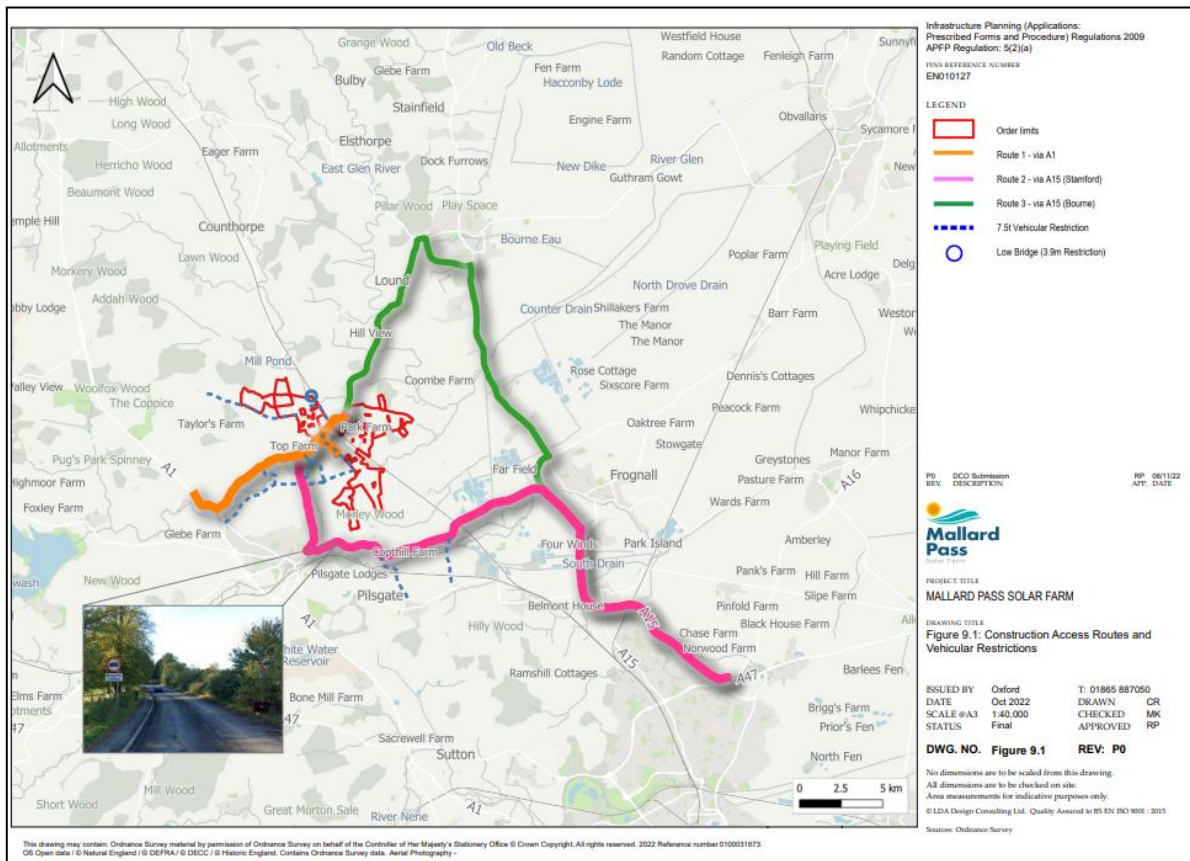


Figure 2 Construction Access Routes & restrictions (APP-092)

- 9.2 The local roads this year have suffered more than usual with the impacts of HGV traffic, with more potholes and the edges of the road just falling apart and there are insufficient funds to repair them.
- 9.3 Even if the HGV traffic did conform to the conditions laid down were the proposed development to be approved, there are still up to 400 employees that have to reach the local area from somewhere. With the workers scheduled to work 12 hour days, they will definitely take the shortest route home, and that usually means going across country. As east/west main connectivity is poor, they will go through the local villages adjacent to the Order limits. This will cause a lot of disturbance through local villages before early in the morning and later into the evening.
- 9.4 Aside from the noise and road damage, risk to the safety of walkers, cyclists and horse riders, I am also concerned about the damage to my property. The ‘body slap’ of empty HGVs thundering cross country on small local roads will cause damage to my worker’s cottage. Agricultural machinery goes far slower and the loads don’t seem to have the same effect. My cottage is a farmer’s cottage, built to a standard akin to a farm worker from its day. It’s not built to accommodate the additional vibration and traffic generated by a national infrastructure project.

10 Other Construction related issues

10.1 Proposed closures

- 10.1.1 Proposed Temporary Road Closures (PRoW) . The Applicant is planning to temporarily close Bridleway BrAW/1/1 as outlined in the dDCO (PDA-004) and in Traffic Regulation Measures Plans (AS-007). This presents some key concerns as it is used by walkers, mountain bikers and horse riders.
- 10.1.2 There is no clarity as to what 'temporary' means. If it were to be for the 2 year construction period that would have significant impact to all users. Is there any possibility the 'temporary stopping up' also relates to the operation of the development, not just the construction/decommissioning?
- 10.1.3 There is no temporary diversion identified for BrAW/1/1 which does not give me confidence that it has actually been thought about and will happen. With the extra HGV and LGV traffic on the road at both ends of the bridleway, for horse riders to lose one of the few safe places to ride poses a real health and safety concern.
- 10.1.4 Whilst the closure sites at PRoW 2A - 2B and PRoW 3A - 3b are sited mainly opposite to the secondary construction compound, both the closure areas are not on flat land rendering the passage of 80 tonne cranes impractical and potentially dangerous. The land around the tree copse is poorly draining requiring substantial hard core surfaces to be put in place. It is also very close to a watercourse (see Hedgerow Plans below), so the sediment washed off the track could go into the watercourse.
- 10.1.5 Figure 3 PRoW 2A - 2B is an extremely long stretch of closure, there is no explanation why this is necessary.
- 10.1.6 Why are the closures and likely track sited adjacent to the woodland which no doubt has the largest biodiversity habitats? The construction process will cause unnecessary displacement when it could be sited in a flatter more open area.

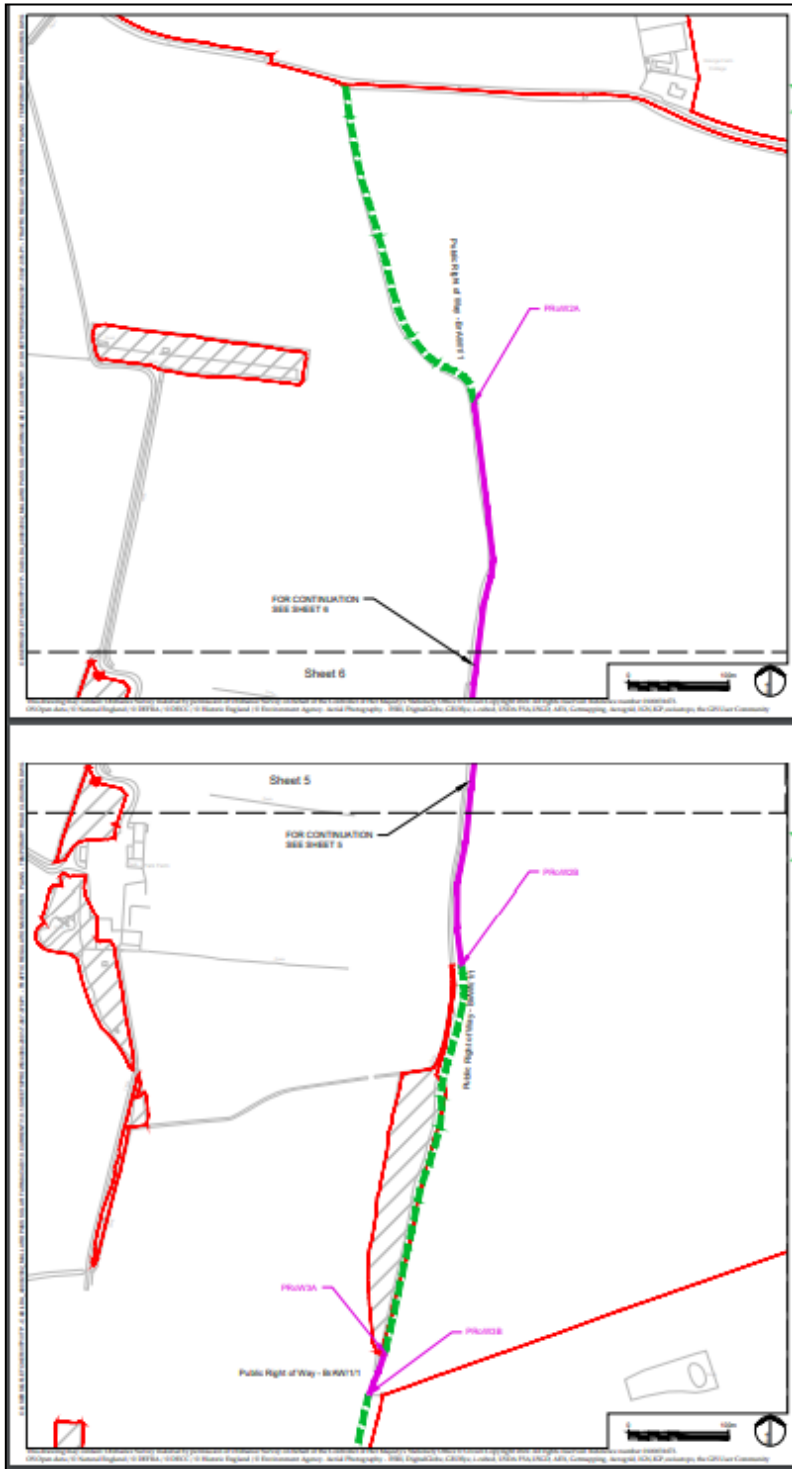


Figure 3 Traffic Regulation Measures - 5 & 6 (AS-007)

10.2 Site Access to Secondary Construction Compound

10.2.1 To create a site access on Carlby Road at the NE end of the Order Limits, the Applicant is proposing to move the existing entrance to Park Farm a few metres east to H5. This entrance has received all sorts of agricultural machinery and HGVs over the years without event. Whilst the documents suggest the online swept path analysis has determined the proposed new access is best, from 18 years experience of driving that road every day, the site access will be moved to a more dangerous point on the bend of Carlby Road. The Hedgerow Plans (APP-012) indicates

hedgerows/trees will have to be taken out which is a BNG loss to be accounted for. I imagine the same can be said for other site entrances.

- 10.2.2 Having reviewed the Hedgerow Plans on Carlby Road, the existing track entrance to Park Farm runs over the top of drainage (see Figure 4). Surely it would be better to maintain the existing track and make sure it is capable of taking the abnormal heavy loads (as it does today), than change the road layout to a more dangerous position on the bend which would require the removal of any trees and hedgerow on the north edge of Carlby Road? The proposed site entrance is dangerous.

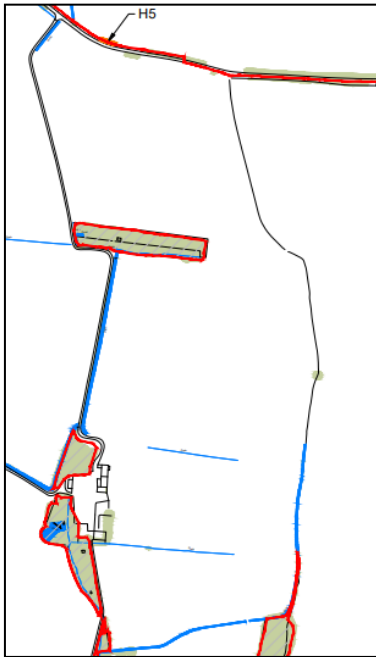


Figure 4 Hedgerow Plans - sheet 3 (APP-012) PRow2A&B, PRow3A&B

10.3 Noise, vibration and air quality

- 10.3.1 12 hour shifts, will increase noise, vibration and poorer air quality earlier in the morning and later in the evening than usual, which 6 days a week would be relentless for residents.
- 10.3.2 2 x 4hr shifts pile driving solar panel infrastructure is an untenable time period for residents affected by the noise and vibration of the activity.

11 Compulsory Acquisition

- 11.1 Figures 6,7 and 8 refer to works No. 7 (works to create, enhance and maintain green infrastructure), in this instance the example is on Carlby Road including:
- 11.1.1 (a) landscape and biodiversity mitigation and enhancement areas;
- 11.1.2 (b) habitat creation and management, including earthworks, landscaping, means of enclosure, and the laying and construction of drainage infrastructure; and

11.1.3 (c) laying down of permissive paths, signage and information boards.

11.2 In respect of plot 03-06 (field 36) why is it necessary to implement compulsory acquisition rights and directly target it at just a section of Carlby Road which already has established hedgerow?

11.3 In respect of plot 03-07 (field 37) which has no visual inter-influence with the solar panels why is it necessary to request CA rights to make green infrastructure changes?

11.4 Whilst the above is just an example there seems to be an over-zealous application of CA rights being requested across the site without due consideration or justification as to why every plot no. request is required.

3	03-06	4	Acquisition of rights over 3261 square metres of verge and unnamed track leading up to the edge of public highway (Carlby Road),	Unregistered/ Unknown (in respect of subsoil beneath public highway) Andrew Jardine Mair 2 Grosvenor Road Billingborough Sleaford NG34 0QN
3	03-07	-	All interests and rights in 114644 square metres of agricultural land and public right of way (BrAW/9/1) north of Carlby Road, Braceborough, Stamford (LL335074 - Absolute Freehold)	Hugh Jardine Mair 36 Grosvenor Road Billingborough Sleaford NG34 0QW Marion Mair 36 Grosvenor Road Billingborough Sleaford NG34 0QW

Figure 5 Book of Reference (APP-023)

Plot Number	Category of Rights Required (where relevant)	Land Power Sought	Works Number/s	Purpose for which Land is Required
03-06	4	Acquisition of new rights	7	7: Required to create, enhance existing and maintain green infrastructure including access tracks
03-07	-	All interests and rights	7	7: Required to create, enhance existing and maintain green infrastructure including access tracks

Figure 6 Schedule of Negotiations and Powers Sought (APP-024)

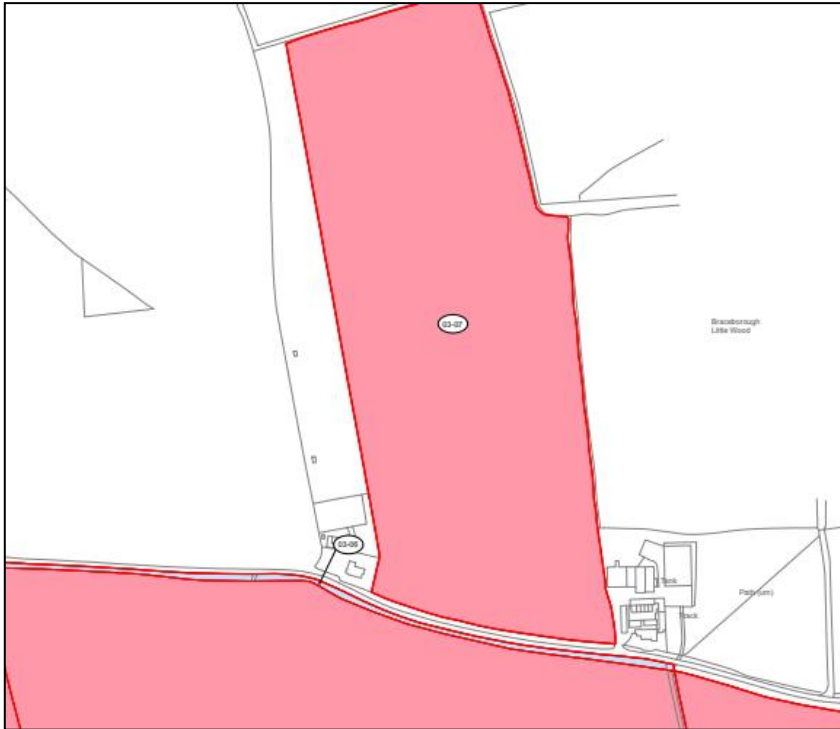


Figure 7 Land Plans (APP-005)

12 Climate change and Net Zero

- 12.1 Lincolnshire County Council and the University of Derby provided commentary relating to the PEIR chapter raising queries regarding efficiency and energy yield, PV panel spacing arrangements and impacts on efficiency, data sources for data used for the assessment within the PEIR and the impact of grid decarbonisation on energy yield and GHG offsetting.
- 12.2 MP: A standalone consultation response document was issued to Lincolnshire County council and University of Derby which directly answers the questions raised in the PEIR commentary.
- 12.3 The starting point is surely what the Applicant has written in their own document. Despite the fact we don't agree with their base calculations they do confirm that the total CO₂ reduction from the grid is lower than the lifetime CO₂ of the facility. Therefore if the facility were not built and the grid decarbonised through other forms of low carbon production, there would be less CO₂ released to the atmosphere. Refer to Chapter 8 Net Zero chapter in the MPAG Written Representation for full calculations.

13 Consultation

13.1 Category 3.

I received correspondence informing me I was Category 3 person and might be entitled to compensation as a result of nuisance factors arising from the construction/operation and decommissioning of the proposed development which at the time made sense as my property is

directly adjacent to the site. However it was subsequently redacted and rescinded without warning or notice, only identified by me reviewing category 3 interests in the Consultation documents. It became apparent that the same thing had happened to quite a number of people, as their names were also redacted in the documents. This is just an example of poor consultation and communication, had I not reviewed the hugely length consultation document files, I would have never known.

14 Summary conclusion

As a resident the impact on me and my property is huge if this solar plant were to go ahead. Whilst undoubtedly it can produce renewable energy for the grid, I truly believe there are more effective less damaging alternatives to reach the renewable energy goals as already outlined in MPAG's Written Representation. Both food and energy production are equally important and one should not be sacrificed to deliver the other.

Appendix A – Relevant Representation

1. Scale: Solar on this scale level is inappropriate and disproportionate in its setting. The majority of solar farms in the UK are very small scale in comparison, can be more discreetly located and contribute less overall harm to the environment and communities.
2. Location: The site has been chosen purely because of proximity to the grid. Little real consideration has been given to broader range of criteria that need satisfying.
3. Landscape character: The site is made up of lightly undulating topography across agricultural land providing clear uninterrupted views in many places. The construction of over half a million solar panels will harm the character of the landscape and turn it into an industrial landscape, and for an indeterminate period of time.
4. Residential receptor: with the most far reaching view across the site and one of the largest field parcels in front of my property, it is not possible or appropriate to screen off the impact of the solar panels. It would intrinsically change the character of the area, whilst also being ineffective, thereby confirming the choice of location to be inappropriate. Screening is not always the appropriate mitigation solution.
5. Productive agricultural land: In the fertile lands of East Anglia the fields across the site are nearly all given over to crop production. Changing their use will sacrifice valuable productive agricultural land at a time when the UK needs to be maintaining production and considering long term food security more seriously.
6. BMV land. Future food strategy clearly indicates that food production must be maintained. Given the high proportion of BMV land proposed to be used, this does not meet local and national planning policy guidance.
7. Community impact: over the last few years since Covid and the increase in working from home, people have had more time for recreational activity attracting more people to the area to enjoy the many public rights of way and beautiful countryside, whether cycling, riding, walking or just driving around. Why would anyone want to walk amongst a sea of solar panels 3.3m high and all the associated equipment and fencing. This industrialisation of the environment will isolate affected local communities; people will vote with their feet and go elsewhere.
8. Riding. I am a keen horse rider using local bridleways. I know horses can be unpredictable at the best of times. Ask them to go somewhere completely out of character with strange noises and potential glint and glare, and it will make for a very unpleasant and potentially dangerous ride.
9. Bio-diversity: Living in a very rural location I am aware of the huge variety of wildlife and this does not seem to be fully represented through the survey or desk based work Mallard Pass has done. An underestimation of the wildlife is an underestimation of the impacts. I am extremely concerned about the impacts through the construction, operation and decommissioning of this scheme to many species and as well as habitat damage.
10. Heritage: Landscape setting is an intrinsic part of the heritage asset, this has been underestimated by Mallard Pass in their evaluation.
11. Flooding: I have watched the change in climate and the more extreme weather conditions making areas of the proposed site and off-site particularly susceptible to flooding, and this will only get worse. Whilst some areas have flood plains, other areas are residential and have suffered badly from

flooding over the years. Solar panels will increase the speed of water run-off, and proposed mitigations will be inadequate given the setting and context of the site.

12. Noise: I am hugely concerned that the noise impact, for myself and anyone within reach of noise-emitting equipment, has not been fully assessed. The open countryside means the SW wind direction, which can be exceedingly strong for many months of the year, will compound this harmful impact which is hugely detrimental to health.
13. Archaeology. This has clearly not been concluded fully yet as the trial trenching activity was still taking place while the application was being submitted in November.
14. Construction: Mallard Pass has failed to identify the real and tangible impacts that will be experienced through the construction process as a stand-alone project, whether on the road network, on the local community and across the environment.
15. Cumulative impacts. If all the key local and national infrastructure projects in the pipeline are to be approved, there will be a complete breakdown of our road traffic network and all the associated impacts of huge construction projects on the local area. This has not been taken into account.
16. There needs to be a clear distinction between a temporary application which has a clear end date, and a permanent one that ends when it is obsolete.
17. Attention to detail and misleading information. There are a number of key areas in the application with inaccuracies, missing or misleading information.
18. Physical & mental health. Not only is the prospect of the solar farm causing great upset and anxiety, but if approved the impact on people living in and around the community will cause continued and sustained harm with potential unintended consequences.
19. Many of the compulsory acquisition rights being requested in the draft DCO place an unnecessary burden and impact on residents.
20. I reserve the right to add to or amend my representation in the light of new or additional evidence produced by the developer or other parties.