- Reference: Mallard Pass Solar Farm Statement of Need Document PINS Ref: ENO10127 Revision PO Ref: ENO10127/APP/7.1
- 2. 1.2.6: Words used "very strong reasons". This is an unquantifiable subjective opinion.
- 3. 2.2.1 and 3.1.6: Solar generation is not specifically referred to in the National Policy Statements and therefore the consequences of the MP proposals are not valid. The fact that solar energy is not mentioned in these policies indicates that the need for large scale developments is not appropriate for the UK.
- 4. 2.2.2: The claim is that the proposed development also addresses all relevant aspects of established and emerging Government energy and climate change policy and commitments. The proposal does not address improving thermal insulation, panels on roofs and brownfield sites.
- 5. 2.2.3: Does not address the alternatives so is not a balanced viewpoint.
- 6. 2.2.4: This is subjective opinion with no basis in fact.
- 7. 2.2.5: The argument this proposed development is required to ensure, implies, that the end justifies the means and only focuses on financial cost issues. The proposal fails to understand that the public may wish to choose more expensive solutions to preserve longer term sustainability.
- 8. 2.2.6: Is a subjective conclusion and continues the mantra of the end justifies the means.
- 9. 3.2.7: Is a marketing statement.
- 10. 3.3.16: Has no basis in fact. There is no guarantee that the land take on this development can be reduced with improved technology.
- 11. 3.3.19: There is no evidence presented that the design life of current available panels is between 25-30 years. The consequence is that the output of the plant can be jeopardised rendering the expected output not to be realised.
- 12. 5.4.24: The fact that this reference has been redacted indicates that it is not a valid assertion.
- 13. 5.4.28 and 8.9: Nuclear reactors do not remove BMV land to the same extent as solar for each kW/h.
- 14. 5.5.7: The statement that solar has undergone significant advances in scale and technology does not provide a justification for the UK to use it.
- 15. 5.5.10: Illustrates that the cost has been the only consideration in this proposal.
- 16. 6.3.2: This statement expresses that electricity demands will grow. The population will grow too. The implication to increase land grab in the MP solar installation, to meet this need, further decreases land usage for food produce.
- 17. 7.4.9: This statement insists that solar generation should grow to meet Net Zero targets by 2050. Increasing land coverage in this way further threatens food security.
- 18. 7.4.12: This statement is a guess by the author. Solar energy production can be from panels on rooftops which does not increase the UK carbon footprint.
- 19. 7.5.3: Suitable sites commercially attractive to investors is solely financial. There is no mention of the consequential reduction in good productive BMV land. Greenbusinesswatch.co.uk states Rutland as 1,095 kWH/m2 saving £576/year and Lincolnshire as 1,061 kWH/m2 saving £561/year.
- 20. 7.5.21: Draft National Policy Statement EN3 (2021). This places site choice by the Applicant for substation grid connections, with minimal disruption to local infrastructure or biodiversity

- and to reduce overall costs. Clearly there is enormous disruption in every area for an installation of this size.
- 21. 7.6.3 and 7.6.4: These comments are subjective guesswork with no figures to substantiate these assertions.
- 22. 9.4.5: What is the meaning of this statement? Another example of poor communication.
- 23. 9.5.5: Using the word "observations" is subjection with no supported evidence. How can "observations" keep in check the per-unit cost of transmission system management?
- 24. 10.3.5: The global supply chain for Canadian Solar is linked to forced Uyghur labour in Xinjiang province, China.
- 25. 10.3.9: This focus by MP is all about cost and the benefits for the developer. It does not include the long term "costs" on landscape, environment, biodiversity and the devastation to people's lives.
- 26. 10.4.5 with Fig 10.5: is an author analysis. This attempts to compare smaller schemes with one large scheme. This excludes any choices by the population. Given the production of CO2 emissions globally to the atmosphere throughout the phases of this industrial development through solar panel production, transport, installation, diversions, annihilation of trees and flora (key to photosynthesis and removal of atmospheric CO2), the amount of increased CO2 production is estimated to take a minimum of 10 years to achieve a net balance of emissions.
- 27. 10.5: This again is all about costs but with complete disregard of people's choice.
- 28. 12 Summary: MP is another link in the chain of provision of renewable energy production. Their costs, for leasing BMV land from land owners and farmers, overheads and profiteering from this development will be charged to the National Grid which shall be passed on to consumers. Where are the Government comparable plans with the best solution for security This is wholly unacceptable.
- 29. 12.1.5: There is no comprehensive analysis of other proposals such as use of brownfield sites for solar arrays, increasing use of thermal insulation and rooftop panels.
- 30. 12.1.6: No evidence presented that bills to consumers will be reduced.
- 31. 13: The author to this Statement is a consultant paid by MP. Therefore, is not independent in his assessments and views expressed.
- 32. Where are the Government comparable plans with the best solution for energy production and food production which includes the need to build up our already depleted wildlife and biodiversity? Mitigation does not replace living things lost during the process. They are lost forever. Replacement and remapping wildlife pathways will be disastrous. The UK needs security with regard to the future.

938 Words