

South Kesteven District Council
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15 June 2023

MALLARD PASS SOLAR PROJECT (MPSP) REF: 01027

SOUTH KESTEVEN DISTRICT COUNCIL WRITTEN REPRESENTATION

South Kesteven District Council (SKDC) has declared a climate emergency, recognising a commitment to contribute to the global efforts to tackle climate change. Renewable Energy proposals are supported by national and local policy, and solar photovoltaic generation, including Solar Farms are recognised as an established means of renewable electricity generation. Indeed, the Council has consented a number of solar schemes within the District, some of which have been operational for a number of years.

However, the proposed scheme would represent a solar development on an unparalleled scale in this rural context. Whilst the proposed development would make a positive contribution to reducing carbon emissions during its operational life, there would undoubtedly be adverse impacts that need to be balanced against the benefits of the scheme. Clarity regarding the type of solar panels is sought and whether this would have potential to reduce the overall land-take, whilst maintaining the stated generating capacity.

A Local Impact Report for South Kesteven accompanies this response, which sets out SKDC's position on the likely impacts of the proposed development on the authority's area and should be read alongside this response. The following are considered to be the most significant of the main impacts that are likely to occur.

- The loss of agricultural land, including high quality Best and Most Versatile Agricultural Land, both in isolation and cumulatively.
- The scale and significance of the impact on the landscape and visual amenity of the area.
- The impacts on Public Rights of Way, their recreational value and consequential negative impacts on the visitor economy.



- The significance of disruption to the community during the construction and decommissioning phases, as well as any significant maintenance/ replacement works during the operational life of the project.
- The impact of the development upon the existing natural environment and the potential to compensate for and mitigate such impacts.
- The uncertainty of the operational lifespan of the project.
- The negative impact on arable specialist species through the loss of a large amount of agricultural land.

As highlighted in earlier representations, SKDC in its role as Local Planning Authority, recognises the role of statutory consultees in the planning process on technical matters within their areas of expertise. In addition, the importance of local knowledge and views from local residents, groups and parish councils and those that would be impacted by the proposed development is also recognised as a very important part of the planning process. Importantly, Local Plan Policy RE1b requires a demonstration of support from affected local communities for renewable energy proposals. At this stage, it is clear there would be a significant potential negative impact on the local community and it is questioned whether any significant potential associated benefits to the local community would be secured to outweigh that harm.

A further significant concern at this stage is the uncertainty of the lifetime of the proposed development, which isn't currently specified. This makes meaningful assessment of the impacts of the proposal, in particular any decommissioning phase, extremely difficult. This uncertainty, as well as the noted scale and significant impacts of the proposal, creates concern and anxiety amongst the local community.

The positive impact in the delivery of Biodiversity Net Gain is noted, although there is a lack of clarity about the extent of this, when considering the presented figure and minimum target in the draft DCO, and therefore the level of positive impact and associated benefit that it can be attributed.

In the event that the Development Consent Order is permitted, SKDC has further concerns regarding the mechanisms for securing some of the suggested mitigation measures over the lifetime of the development. i.e. additional permissive paths, alternative agricultural land uses and the robustness of any mitigation over the short-term post construction as well as the long term landscaping management and maintenance arrangements.

In summary, based on the current understanding the application proposals and the outstanding concerns regarding some of the proposed mitigation measures, when weighing the benefits of the scheme against the significant harm that would arise from the negative impacts, SKDC objects to the proposed development.



Comments on Draft Development Consent Order

In respect of the Draft Development Consent Order (DCO), it is noted that the Examining Authority, typically seek the views of the relevant local authorities on DCO articles, requirements or DCO Obligations. At this stage, SKDC have not had the opportunity to consider in detail the content of the Draft DCO. Accordingly, SKDC only has the following initial comments to make about the Draft DCO and its current or possible content. These comments are made without prejudice to the examination and scrutiny of the Draft DCO, as the examination progresses and indeed the ability to make further detailed observations as required, as part of the examination process.

- SKDC have not thus far been afforded the opportunity to review the draft requirements for which they will have assigned responsibility but intend to make separate comments on these as part of the examination process, particularly in respect of responses to the Examining Authority's Written Questions.
- SKDC anticipate that this will be the main area of comments, for which we will seek to make further written observations.
- SKDC may also wish to make observations on other parts of the draft DCO in respect of the existing or proposed content, particularly where it relates to the delivery of mitigation associated with the negative impacts as identified within this report.

Please do not hesitate to contact me should you need clarification on any of the points raised in this response.

Phil Jordan
Development Management & Enforcement Manager



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