Mallard Pass
Solar Farm

# Mallard Pass Solar Farm

## Applicant's Responses to Interested Parties' Deadline 2 Submissions' - Site Selection, Design and Sizing

**Deadline 3 - June 2023**

EN010127

EN010127/APP/9.15

# Applicant's Response to Interested Parties' Deadline 2 Submissions on Site Selection, Design and Sizing

| Parties Raised | Sub-Theme | Issues Raised | Applicant's Response |
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| REP2-051(LIR), REP2-052(FWQ), REP2-053(WR), REP2-047(WR), REP2-048(LIR), REP2-050 (FWQ), REP2-044(LIR), REP2-045(FWQ), REP2-046(WR), REP2-130, REP2-089, REP2-090, REP2-219, REP2-182, REP2-100, REP2-057, REP2-073, REP2-060, REP2-228, REP2-137, REP2-129, REP2-238, REP2-227, REP2-218, REP2-148, REP2-203, REP2-149, REP2-117, REP2-205, REP2-198, REP2-138, REP2-146, REP2-185, REP2-131, REP2-106, REP2-151, REP2-213, REP2-134, REP2-184, REP2-194, REP2-097, REP2-215, REP2-209, REP2- | Scale of development | There is significant concern about the size and scale of the Proposed Development. It will dominate the landscape, changing the character of this deeply rural area and giving rise to significant adverse effects on the landscape character of both the site and the wider landscapes.<br><br>The large-scale nature of the development and the associated scale of its impact on the countryside and the appreciation and enjoyment of it in this feature of the County are negative.<br><br>The whole site covers 852 ha yet the area which will actually generate electricity is to be approximately 426ha with the remaining half (426ha) being used for mitigation must raise questions on the suitability of the site.<br><br>The development would dominate the area, changing the landscape forever and would be a utilitarian solar farm on a vast scale which would industrialise the landscape. It is unprecedented and untested in sheer size and requires further in-depth assessment. | The Applicant has sought to maximise the amount of renewable energy generated by the scheme, whilst ensuring that impacts are minimised are far as possible.<br><br>Revised draft NPS EN1 (paragraph 3.1.2) and adopted NPS EN1 (paragraph 3.2.3) recognise that: "it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised by the application of policy." There is therefore a recognition by Government that large-scale infrastructure projects will have local impacts – the emphasis is therefore on minimising those impacts as far as possible.<br><br>Whilst this is a large scheme, it is necessary to deliver multiple large-scale projects to meet the ambitious target in the British Energy Security Strategy (April 2022) and revised draft NPS EN3 (paragraph 3.10.2) of 70GW of solar by 2035. Solar is a technology that can be deployed quickly and so it has a critical role in meeting Net Zero. See Statement of Need [APP-202] and the Applicant's response to ExA's FWQs Q1.2.6 [REP2-037] which explains the role of large-scale ground mounted solar in reaching Net Zero. In light of decisions in Cleve Hill, Little Crow and most recently Longfield determined, and Sunnica due to be determined within the Examination timetable, it cannot also be said that such developments are unprecedented or untested.<br><br>Whilst it is recognised that there will be a change to the landscape, existing and revised draft NPSs recognise that it may be difficult to completely mitigate the impact of energy NSIPs on the landscape (see revised draft NPS EN1 (paragraphs 5.10.5 and 5.10.34-5.10.36)). In this regard, it is important to note that whilst the Application Site lies within the countryside, it is not subject to any |

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| 217, REP2-064, REP2-215, REP2-136, REP2-235, REP2-192, REP2-178, REP2-237, REP2-177, REP2-164, REP2-157, REP2-113, REP2-105, REP2-123, REP2-125, REP2-114, REP2-211, REP2-126, REP2-054, REP2-169, REP2-193, REP2-236, REP2-143, REP2-124, REP2-059, REP2-176, REP2-150, REP2-160, REP2-089, REP2-090, REP2-073, REP2-138, REP2-234, | | | special national landscape designations, such as Areas of Outstanding Natural Beauty or National Parks.<br><br>There are two local landscape designations within relatively close proximity of the site, which are an Area of Particularly Attractive Countryside (APAC) approximately 0.5km to the north-west of the Order limits, and the Area of Local Landscape Value (ALLV) approximately 0.82km to the west of the Solar PV Site. The Landscape and Visual Impact Assessment [APP-036] concluded that there would not be significant effects on either of these designations, with significant landscape impacts generally limited to local Landscape Character Areas in the immediate vicinity of the Order limits.<br><br>The Applicant also adopted a design-led approach from the early stages of project development (see Design and Access Statement [REP2-018], and its response to residential properties and PRoWs in APP-057 and APP-058). In addition to the mitigation proposed, the Proposed Development includes 158.7 hectares of new habitat creation (tussocky grassland, wet woodland and calcareous grassland), 419ha of grazed grassland under the solar arrays and improved public access through 8.1km of new permissive paths [see REP2-018]. The Applicant considers that the correct balance has been struck between delivering much needed renewable electricity; and enhancements which will improve how the solar scheme sits within its local environment and provides community benefits.<br><br>The Proposed Development has also sought from an early stage to apply generous offsets to existing features such as PRoWs, hedgerows and existing trees and woodland (see DAS REP2-018).<br><br>The various areas of the scheme are described in DAS [REP2-018]. As well as the enhancement areas described above, the Application Site includes the retention of 239ha of arable farmland. Part of the reason for the large size of the mitigation areas is the inclusion of fields for skylark mitigation, which need to be secured through the DCO, but will be retained in agricultural use. The site area also includes a number of roads, principally as cable routes, or for |

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| | | | targeted widening of the highway, which adds to the site area but will include temporary works only.<br><br>It should also be noted that the appearance of scale on plan view is significantly broken down when experienced on the ground, through existing and proposed hedgerows, tree and woodland planting and the existing topography. The overall scale of the development would therefore appear subdivided and compartmentalised such that it would not be entirely visible from any given location. Chapter 6 of the ES Landscape and Visual [APP-036]) explains the extent of large-scale visual effects as follows:<br><br>"The extent of Large scale visual effects, where the Proposed Development would form a major alteration to key elements, features, qualities and characteristics of the view such that the baseline will be fundamentally changed, would generally be limited to locations within or immediately surrounding the Solar PV Site and Onsite Substation. This would include from Bridleway BrAW/1/1 between the railway bridge and Carlby Road within the eastern parcel; Essendine Road near The Freewards; public footpath Uffi/5/1 between Cobbs Nook Farm and Uffington within the southern parcel; and Bridleway E169 within the north-western part of the Order limits."<br><br>Paragraph 6.5.52 states:<br><br>"Negligible scale effects would be experienced in the wider landscape where the Proposed Development is barely discernible from the more distant parts of the 2km study area."<br><br>The Applicant has sought through a design-led process to ensure that the impacts of the scheme on the local community are minimised, for instance by removing fields from both sides of routes in and out of Essendine, to avoid the feeling of overbearing on existing settlements. |
| REP2-047(WR), REP2-048(LIR), REP2-050 (FWQ), | | The proposal under consideration has been amended so as to try and reduce its impact on the surrounding settlements, however its location and spread are such that even with | The impacts to users of the PRoW both within the Order Limits and in the vicinity has been assessed with the Amenity and Recreation Assessment (ARA) [APP-058] which forms Appendix 6.5 to the LVIA. Impacts to the countryside through NMU routes as a |

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| | | these elements of the scheme removed, there remains a significant impact on the landscape from the proposed panel fields when travelling in and through the area, in terms of impact on PRoW users, road users, cyclists, residents and passengers on the railway line. | community resource are discussed in the Applicant's thematic response to Public Rights of Way and Permissive Paths (and the plans referred to in those responses at Appendix B) submitted at Deadline 3.<br><br>Impacts to residents have been considered within the Residential Visual Amenity Assessment [APP-057] and that threshold is not breached following mitigation. Localised impacts arise within Visual Receptor Group 1, which are properties closest to the Proposed Development. |
| REP2-047(WR), REP2-048(LIR), REP2-050 (FWQ), REP2-138, REP2-131, REP2-164, REP2-117, REP2-123, REP2-114, REP2-068, REP2-153, REP2-056, REP2-167, REP2-190, REP2-160 | Impact on Property Value | Concern about the impact on the local residents' amenities and potentially on property prices in the area. Whilst the impact on property prices is not a material planning consideration, it is a real-life impact that local residents will bear as a consequence of the scale and nature of the development.<br><br>Concern that the scheme would negatively affect property values in the local area. | The Applicant has sought to reduce impact on individual homes, and this was a key part of the scheme development process set out in the DAS [REP2-018] and RVAA [APP-057]. In many cases, whole fields were removed from the area potentially suitable for solar to ensure sufficient setback from people's homes, together with significant landscape buffers.<br><br>The DAS [REP2-018] also sets out Design Guidance which detailed design will be required to comply with (secured by requirement 6 of the draft DCO [REP2-006]). This includes measures to ensure that residential amenity is respected. For instance, Design Guidance PE.4.3 states that there will be a 250m offset of solar stations and storage containers from residential properties. |
| REP2-190, REP2-235, REP2-124 | Size and efficiency of development | Question the size of development and whether the amount of energy generation can be achieved on a smaller land.<br><br>This will probably cover the largest area of any power station site in the UK - 5 times bigger than the Hinkley Point C nuclear plant but producing only a tiny proportion of the power output by comparison. | Government policy is clear that to achieve Net Zero we need a combination of renewable and low carbon technologies, including wind, solar and nuclear power. See Statement of Need [APP-202] and Applicant's response to the ExA's FWQs, Q1.2.2 and Q1.2.3 [REP2-037].<br><br>Solar and wind are both quickly deployable and so have a greater part to play than nuclear in the meeting 2035 targets. As a comparison, using the example of Hinkley Point C quoted, this was granted its DCO in 2013, The project is still under construction. Its developer is currently forecasting the first unit to be operational in June 2027 with a risk of further delay assessed at 15 months |

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| | | | although in its 2023 Q1 Sales & Highlights presentation, EDF noted that the risk of additional delays and budget overruns is increasing. Using the same timescale, Sizewell C (just consented but not yet financed) would not be delivering power until the mid-late 2030's.<br><br>Government policy in the British Energy Security Strategy and in the emerging revised draft energy NPSs is for significant amounts of new solar to be delivered by 2035, with a target of 70GW. As set out in the answer to ExA FWQ 1.0.16 and section 1.2, the Applicant's proposals are consistent with the policy expectation for solar efficiency needed in order to make best use of the substation connection. |
| REP2-047(WR), REP2-048(LIR), REP2-050 (FWQ), REP2-089, REP2-090, REP2-057, REP2-138 | Design of development | The development would not make a positive contribution to the character of its surroundings and the countryside in general and would therefore have a negative impact in respect of Policy CS19 of Core Strategy. | This application falls to be considered under the relevant NPS, whilst local policy can be an important and relevant consideration, insofar as it is consistent with the NPS (see Planning Statement [APP-203]). NPS EN1 and EN3 clearly recognise that energy NSIPs will have residual adverse effects and the emphasis should be on minimising them and ensuring that those effects are outweighed by the benefits.<br><br>As noted in the DAS [REP2-018] and in response to the issues above, the Applicant has sought to take a design-led approach to siting the areas for solar and is also proposing significant enhancements.<br><br>Whilst Policy CS19 was not intended to deal with solar schemes of this scale, it is considered that the Applicant has taken every opportunity to provide positive enhancements to the character of the countryside, whilst maximising the renewable energy generated, through the measures set out in the OLEMP and secured through the Design Guidance in the DAS. |
| REP2-057, REP2-138, REP2-134, REP2-209, REP2-211 | Height of solar panels and numbers of CCTV cameras | The proposed Solar Panels are too high at 3 metres plus, and installing hundreds of CCTV cameras will negatively affect the people who use the area as an amenity. | The Project Description [REP2-012] explains that 3.3m is the maximum height of the panels. The Landscape and Visual assessment [APP-036] shows that by Year 15 the proposed vegetation will be sufficient to ensure that visual effects would be confined to within 500m south, west and north and limited to visual receptor group 1 which located within or in close proximity to the |

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| | | | Solar PV Site. This receptor would experience Major-Moderate adverse effects which are significant however these would reduce over time as the proposed vegetation matures and provides further visual screening. For all other areas, effects will not be significant following maturing of planting.<br><br>The CCTV will be inward facing to ensure security of the solar farm. It will not be directed to any public areas, including PRoWs. |
| REP2-125 | Design parameters – setbacks and heights | In response to paragraph 2.11.1 of the Applicant's Non-Technical Summary [APP-106], the 10m and 15m set-backs of PV Arrays and associated fencing from existing hedges and woodland should be increased to 12m and 20m. | The retention of existing vegetation and avoidance of Root Protection Areas (RPA) is a key design of the Proposed Development. An offset of at least 10m from existing vegetation and 15m to woodland to boundary fencing is considered suitable to avoid harmful impacts to RPAs, in light that the maximum RPA area under BS5837 – Trees in relation to Design, Demolition and Construction is 15m radius. Therefore, all construction of solar PV panels would be outside of existing RPAs whilst appropriate technical construction methods could be deployed, if necessary, where intrusion into RPAs is unavoidable (e.g. access tracks gateways). |
| John Hughes | Substation Design | Little detail on substation design, size etc. I don't believe many people understand or are aware that a completely new substation 12.5 M high will be built in what is currently an arable field (19) and be visible 24/7 for some local residents from within their homes and will never be obscured by mitigated planting. Still now in the DCO we have little detail to the new substation and structures that are proposed to be placed in field 19, other than APP-125 (Figure 5.5 Illustrative Onsite Substation Layout).<br><br>If the project goes ahead nothing should be built in fields 26, 18 or 19 and the old railway line west of the ECML should be used as the boundary for those residents who live West of | As explained in Section 5.2 of the Project Description [REP2-012] the Application proposes a parameters-based approach, which is then assessed in the Environmental Statement. The detailed design of the substation will be controlled through requirement 6 of the draft DCO and will be submitted to the Local Planning Authority for approval, subject to the DCO being granted.<br><br>Design Guidelines for the detailed design of the Project Substation are set out within the Design and Access Statement (DAS) [APP-204] and include no permanent lighting (PL3.17).<br><br>The LVIA provides comment on the impact of the Substation throughout the assessment, noting when it is likely to be visible or not within views.<br><br>Photomontage E [APP-172] provides a visualisation of the proposed substation looking from Stanford Road (A6121). This photomontage illustrates the screening effect of a hedgerow within individual |

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| | | the ECML as it was East as mitigated planting will have no effect long term on the visual impact of the substation or PV arrays in field 18, as the current substation highlights.<br><br>Mallard Pass when questioned would not confirm what the cost of a substation to feed into the grid would be and have not considered it an option in their application when questioned on if the site location could be moved. | hedgeline trees, which proves an element of screening of the PV Arrays. It should be noted that whilst this is an illustrate photomontage, the Green Infrastructure Strategy provides for a tree belt to be located along the alignment of hedgerow / hedgeline trees. The tree belt would strengthen the screening of the PV Arrays located in fields 26 and 18 and the substation in Field 19. The proposed tree belt would be seen in the context of the existing wooded disused railway line, helping assimilate it into its immediate landscape context.<br><br>The Onsite substation has been located in close proximity to the existing Ryhall substation in order to minimise (and the associated construction disruption) the length of the grid connection cable. It is considered that the colocation of the taller elements of the electrical infrastructure, rather than dispersed infrastructure reduces the visual impact and effects on the landscape character. It is contained within Field 19 which benefits from a strong boundary network of vegetation which would be retained. The Onsite Substation has been located to the west of the East Coast Mainline so to avoid having to cross the railway line with a 400kV cable. If the Onsite Substation were to be relocated within proximity to the existing Ryhall Substation it would reduce the distance to noise sensitive receptors when compared to its current location. |
| REP2-047(WR), REP2-048(LIR), REP2-050 (FWQ), REP2-089, REP2-090, REP2-182, REP2-169<br><br>REP2-096, REP2-148, REP2-138, REP2-213, REP2-123, REP2-125, REP2-054, REP2-176, REP2-066, REP2-061 | Site Selection | Concerns over the site selection process and the loss of such a significant amount of agricultural land would be considered a negative impact. | The Applicant has described how it sought to reduce the loss of best and most versatile (BMV) land through the site selection process in response to the ExA's FWQ (Q1.3.6) [REP2-037] and in the Site Selection Report [APP-203]. |

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| REP2-089, REP2-090<br>REP2-138 | | The impact of faster run-off has not been considered or accepted. Had further grass-root survey been undertaken at site selection and alternative location might have been chosen given the prospect of increased flooding. | The Application has been informed by site-specific flood risk modelling (see Flood Risk Assessment [APP-086]) which shows that the Proposed Development will not increase the risk of flooding on the site or elsewhere. The Environment Agency has confirmed in the draft Statement of Common Ground that they agree with this conclusion [REP2-030]. The FRA also demonstrates that the Sequential Test is met for the Proposed Development. |
| REP2-089, REP2-090, REP2-138 | | There is better irradiance elsewhere in the country; therefore, this factor cannot hold any real weight in the overall planning balance. | Whilst there are some areas of the country with better irradiance, Lincolnshire has comparatively good irradiance levels and also large areas of undeveloped land, a sparser settlement pattern and with significant available grid capacity (see Statement of Need, APP-202, paragraph 7.5.20). Irradiance is also only one of the factors taken into account, as explained in the Site Selection Report [APP-203].<br>Irradiance levels are shown in Figure 7.4 of the Statement of Need. |
| REP2-089, REP2-090, REP2-138, REP2-194 | | Topography exacerbates many of the scheme's negative impacts and is not appropriate for solar. | With respect, the Applicant's view is that the local topography assists with the ability to accommodate solar in the landscape, through the limited nature of longer distance views, generally broken up by hedgerows. Please see the Applicant's response to FWQ 1.3.5 which explains this further.<br>Paragraphs 6.3.5 to 6.3.8 of the LVIA [APP-036] and Figure 6.1 [APP-133] illustrate the topography of the Order limits and wider area, the gently undulating nature of which assist in screening views of the Proposed Development. |
| REP2-089, REP2-090, REP2-138, REP2-123, REP2-114 | | Application is based solely on existence of spare capacity at Ryhall 400kv substation. This has governed the process of alternative site analysis and site selection and precludes a sufficiently comprehensive analysis of proper alternatives and has rendered other considerations less meaningful. | The Applicant considers that this is a completely reasonable place to start. Without a grid connection, the electricity generated cannot be exported to the grid. Available grid connections without significant upgrades are relatively rare and should be maximised in the interests of the timely delivery of renewable energy.<br>In a recent planning appeal decision in Hambleton District Council (Planning Inspectorate reference APP/G2713/W/23/3315877, Inspector's Report at Appendix A), the Inspector recognised the |

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| | | | importance of grid connections in the site selection process. The Inspector's report states that "given the proposal is seeking to use the spare grid capacity at this sub-station, and bearing in mind the limited opportunities that currently exist for grid connections nationally, I consider it is, in this case, justified to only consider sites within an area that could also make use of this capacity, rather than capacity that may exist at other substations elsewhere". While this is a Town and Country Planning Act application it is vindication of the general methodology through which the Applicant has considered the appropriate Application Site by a national planning decision making body which reflects current government direction.<br><br>Further information is provided in the Applicant's response to the ExA's First Written Questions Q1.2.6, Q1.3.1, Q1.3.2 and Q1.3.4 [REP2-037]. |
| REP2-089, REP2-090, REP2-138 | | Insufficient for Applicant to have considered only other grid connection points into the Ryhall substation, as opposed to looking at high voltage stations around the UK. | If the UK is going to deliver the amount of renewable energy needed to meet Net Zero, all available grid connections with capacity need to be maximised. Other grid connection points are therefore not an alternative to connecting into the spare capacity at Ryhall.<br><br>As noted earlier, the site whilst in pleasant countryside does not fall within any national or locally designated landscape and is not subject to any other constraints and designations that make it unsuitable for solar.<br><br>The Applicant's response to the ExA's First Written Questions Q1.3.2 and Q1.3.3 [REP-037] explain the ability of substations in the East Midlands to accommodate new renewable energy capacity and also the reasons why the spare capacity at Ryhall should be utilised. |
| REP2-089, REP2-090<br>REP2-138<br>John Hughes | | Land selection needed a deeper review through EIA process. Applicant has sought to retrofit and prove the suitability of the site. | The site selection and design iteration processes were undertaken with the appropriate level of information to the time in project development that they took place. The Applicant undertook an environmental-led approach to site selection, as explained in the Applicant's response to Q1.3.1 of the ExA's FWQs [REP2-037]. |

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| | | | This environmental review was provided at Appendix F to the Applicant's response to the ExA's FWQs [REP2-038].<br><br>As the design has developed, there has been nothing in the on-going EIA assessments that would negate the decisions previously taken. |
| REP2-089, REP2-090<br>REP2-138 | | Approach to ALC is unsatisfactory. Applicant chose site before clear understanding of ALC classification and impact on BMV. Approach is contrary to policy in NPPF and Draft EN-3. | The Applicant has described how it sought to reduce the loss of best and most versatile (BMV) land through the site selection process in response to the ExA's FWQ (Q1.3.6) [REP2-037].<br><br>The Planning Statement Appendix 1 [APP-203], paragraphs 3.1.6-3.1.12, explains how BMV was taken into account in selecting the site. In particular, the initial site selection was informed by the 2017 Predictive ALC Maps published by Defra which show the Proposed Development as lying within an area with the lowest probability of BMV. In this context, much of the wider area around the site is shown as having moderate or high probability of land being BMV quality (see Figure 12.4 of the Chapter 12 of the ES, Land Use and Soils [APP-042].<br><br>The Applicant used publicly available information on ALC to inform site selection before undertaking detailed survey work. When the survey work was then undertaken, the Applicant then considered ALC in the scheme design process, as described in the response to Q.1.3.6. |
| REP2-089, REP2-090, REP2-138 | | No stage during site selection did Applicant seek to gain community support (key pillar of NIC Design Principles) and focussed on belief impacts could be mitigated out. | The Applicant undertook an iterative approach to consultation that genuinely sought to gain support from the community. The Applicant consulted at an early stage, when proposals were still developing (Stage One), and at a stage when proposals were more developed (Stage Two). At each stage (including from Stage Two to submission), changes were made to seek to address feedback from the community and questions were asked on specific areas where the community may be looking for physical improvements to the area, for instance, through the addition of new permissive paths. As a result, permissive paths were included to enable a circular walk in the local area. |

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| | | | The Applicant is seeking to deliver a large scale infrastructure proposal and accepts that the community, if the project is consented, will bear local impacts as a result of hosting national scale infrastructure. However, the Applicant has sought to reduce effects as far as possible and considers that with the mitigation in place, the benefits of the scheme far outweigh any negative effects. |
| REP2-089, REP2-090, REP2-138, REP2-066 | | Insufficient approach to alternative site assessment both in terms of technologies and sites. Applicant has not met legal obligations. | The Applicant's approach to considering alternative sites is set out in Appendix 1 of the Planning Statement [APP-203] and in response to the ExA's FWQs Q1.3.1-1.3.7 [REP2-037].<br><br>As noted in the Applicant's responses above, the Government is clear that a range of technologies will be required to meet Net Zero.<br><br>The Applicant is a solar developer and is not required to explain why it did not pursue alternative technologies, only to describe the alternative technologies that it did consider. See Alternatives and Design Development Chapter of the ES [APP-034].<br><br>The Applicant also notes the recent judgement in the Sizewell C Judicial Review decision (see Appendix C), which emphasised that in considering alternatives for energy schemes, the Government's policy that a secure supply of generation from a range of sources is the relevant policy consideration to be taken into account. As such, consideration of alternatives within the context of the need to deliver the target of 70GW of solar should be the focus, rather than comparing solar to wind or nuclear (see in particular paragraph 131 of the judgement). |
| REP2-089, REP2-090, REP2-138 | | No community support for solar nor were community asked whether a wind farm would gain support and general feedback would be that wind would use less space, is more efficient and less impact on agricultural land. | The Applicant is proposing a solar farm and is not obliged to consider alternative technologies (see APP-034), nevertheless, the Applicant did pose this question in community exhibitions, when the query was raised, and the overall response was that wind would not be a preferred alternative.<br><br>Notwithstanding that the Examining Authority is considering the application proposal, which is for a solar farm, not a wind farm, it should also be noted that current Government policy is not |

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| | | | supportive of onshore wind, compared to strong support for solar (see Planning Statement [APP-203]). |
| REP2-089, REP2-090, REP2-138 | | The Applicant states that Order Limits have low wind yield relative to other parts of the UK, which is incorrect. There is no justification that wind would not be economically viable without causing greater environmental consequences. | The Applicant notes its response in relation to wind in the previous row. The Applicant is not proposing a wind farm and is not obliged to consider alternative technologies, but to set out the alternative technologies that were considered. |
| REP2-089, REP2-090, REP2-138 | | The Applicant has not given due consideration to east/west panel alignment and potential advantages over fixed south-facing. | The Applicant discounted east/west panel alignment at an early stage on the basis of industry experience of its performance.<br>The Applicant also considered that the landscape and visual effects of east/west alignment would be greater on the basis of the comparative lack of spacing between panels. The south-facing and tracker technologies, by comparison, offer opportunities for greater spacing between panels to allow the panels to be more sensitively accommodated in the landscape and for grazing and biodiversity improvements. |
| REP2-136, REP2-135 | | The developer is not using the original substation, which was the main excuse for selecting this area, they are now building a new one. | The new substation proposed is an on-site project substation which is required to transform electricity which is generated at the site from 30kV (the proposed generation voltage) to the 400kV required for transmission on the National Electricity Transmission System (NETS).<br>This transformation is necessary for all generating facilities which connect to the NETS.<br>The transformer and various ancillary equipment at the existing Ryhall substation will be used to transmit the power generated onto the NETS. If the Ryhall substation did not exist in its current state, there would be no existing ability to transmit power to the NETS and a new (or expanded National Grid substation would need to be constructed. The Applicant's rationale for locating close to Ryhall to make use of the existing and available infrastructure located at the National Grid substation, therefore still stands. |

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| REP2-234 | | To the extent that the Government is set on a massive solar installation, they should look further north to Sandside Hill, which is an area of over 8,000 acres currently for sale adjacent to the Dounreay nuclear establishment (grid connection). | This proposal is by a private developer, although Government policy is supportive of the need for solar (see Planning Statement, [APP-203]).<br>Whilst the Applicant is not familiar with the site mentioned, and it may well be suitable for solar, or other forms of renewable and low carbon technology, it would be needed in addition to other sites in order to meet the Government's 70GW commitment, including Mallard Pass Solar Farm. |
| REP2-057, REP2-138 | Site selection - Land Topography | In relation to the topography of the land surrounding the village of Essendine, many of the proposed fields to be acquisitioned are North or North West facing.<br>Therefore, in addition to the low annual efficiency (government use an annual efficiency of 10%) from panels located on ideally 3 oriented slopes, the installation on slopes which are of sub-optimal orientation will adversely impact on the already poor efficiency of the panels. | See Applicant's response to ExA's FWQ 1.3.5 [REP2-037] and Appendix 1 [APP-203] which shows that the topography of the site is favourable to solar. |
| REP2-124 | Site selection – Ryhall substation | A major reason for choosing this location appears to be the commercial benefit of using "spare" capacity in the existing substation at Ryhall. This capacity was presumably built for a reason and at the time given planning consent for that purpose, whatever it was. What has changed so that this capacity is no longer needed? Will using the capacity for this power station result in the need to build more substation capacity in the future to support whatever it was actually built for? | As explained in paragraph 4.5.7 of the Planning Statement [APP-203], all sub-stations are built in three phases, but in this case only two are required to power the railway. This leaves the third phase available for the project to connect into. |
| REP2-169, REP2-220, REP2-198, REP2-190, REP2-104, REP2-184, | Alternative Sites | There is no logical reason why Mallard Pass needs to be located on good-quality soil, as there are alternative sites available. | The Applicant has set out its approach to considering brownfield land in the Planning Statement Appendix 1 [APP-203] and its response to the ExA's FWQ 1.3.8. |

| Parties Raised | Sub-Theme | Issues Raised | Applicant's Response |
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| REP2-054, REP2-118, REP2-098, REP2-114, REP2-125 | | More suitable land usage options exist on brownfield sites or much lower agricultural-grade land. There are alternatives (lower-grade land areas, brownfield sites and car parks and rooftops, factories, large businesses etc.) that do not pose such a threat to our food security. | The Applicant supports maximising the use of brownfield land and rooftops, but this will not be enough to deliver the level of solar required to meet Net Zero (see Statement of Need [APP-202] and the first response in this table). |
| REP2-219, REP2-191, REP2-112, REP2-089, REP2-090, REP2-096, REP2-137, REP2-129, REP2-227, REP2-148, REP2-218, REP2-149, REP2-138, REP2-213, REP2-190, REP2-064, REP2-194, REP2-164, REP2-157, REP2-098, REP2-125, REP2-211, REP2-143, REP2-176, REP2-118, REP2-182, REP2-119, REP2-120, REP2-230, REP2-152, REP2-214, REP2-115, REP2-111, REP2-216, REP2-107 REP2-229, REP2-066 | Alternatives to technology and location | Solar panel technology should be installed on roofs of homes and businesses rather than in the countryside, or using brownfield land or on unproductive land alongside motorways and dual carriageways.<br><br>Wind and Nuclear are more efficient options.<br><br>The choice of this location has more to do with spare capacity of electrical distribution than its intrinsic merit.<br><br>All single-form renewables fail to generate under certain conditions. Why have alternatives, or a mix, not been considered when the conditions are apparently so good for example in connecting to the sub-station? | Government policy is clear that to achieve Net Zero we need a combination of renewable and low carbon technologies, including wind, solar and nuclear power. See Statement of Need [APP-202] and Applicant's response to the ExA's FWQs, Q1.2.2 and Q1.2.3 [REP2-037].<br><br>Solar and wind are both quickly deployable and so have a greater part to play than nuclear in the meeting 2035 targets. As a comparison, using the example of Hinkley Point C quoted, this was granted its DCO in 2013 and is currently planned to be commissioned in 2027. Using the same timescale, Sizewell C (just consented) would not be delivering power until the mid-late 2030's.<br><br>Government policy in the British Energy Security Strategy and in the emerging revised draft energy NPSs is for significant amounts of new solar to be delivered by 2035, with a target of 70GW.<br><br>The Applicant also notes the recent judgement in the Sizewell C Judicial Review decision (see Appendix C), which emphasised that in considering alternatives for energy schemes, the Government's policy that a secure supply of generation from a range of sources is the relevant policy consideration to be taken into account. As such, consideration of alternatives within the context of the need to deliver the target of 70GW of solar should be the focus, rather than comparing solar to wind or nuclear (see in particular paragraph 131 of the judgement). |

| Parties Raised | Sub-Theme | Issues Raised | Applicant's Response |
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| REP2-153, REP2-227, REP2-148, REP2-143, REP2-198, REP2-223, REP2-127, REP2-206, REP2-156, REP2-145 | | Comment questioning the choice of solar farm over wind farm | The Applicant is proposing a solar farm and is not obliged to consider alternative technologies (see APP-034), nevertheless, the Applicant did pose this question in community exhibitions, when the query was raised, and the overall response was that wind would not be a preferred alternative.<br><br>Notwithstanding that the Examining Authority is considering the application proposal, which is for a solar farm, not a wind farm, it should also be noted that current Government policy is not supportive of onshore wind, compared to strong support for solar (see Planning Statement [APP-203]). |
| REP2-047(WR), REP2-048(LIR), REP2-050 (FWQ), | ExA Q1 – Q1.3.8 Current status of the Rutland Local Plan | The Council has committed to producing a new Local Plan. Public consultation has been undertaken on Issues and Options and it is proposed that public consultation will take place on a "Preferred Options" draft plan in the Autumn.<br><br>The current Local Development Scheme for Rutland can be found here: https://www.rutland.gov.uk/planningbuilding-control/local-plan/new-local-plan/localdevelopment-scheme-new-local-plan<br><br>In preparing the Local Plan, the Council has commissioned evidence on areas within the County which may be suitable for renewable energy schemes, such as commercial scale solar farms. This evidence is expected to be finalised in the next 2 months, at which time the Council would expect it to be a material consideration for appropriate planning applications in advance of the Local Plan being submitted and adopted. | The Applicant notes RCC's response. In respect of the evidence that RCC is commissioning on the location of commercial-scale solar farms, the Applicant notes that it is not for the Local Plan process to set policies to deal with impacts arising from Nationally Significant Infrastructure Projects (NSIPs), although it could set guidance that may be appropriate in considering local impacts. It is therefore assumed that the evidence base referred to by RCC will focus on projects under 50MW, to be considered by the local planning authority under the TCPA 1990.<br><br>The Applicant would welcome sight of any evidence and will engage with RCC to ensure that any implications on the local impacts of Mallard Pass Solar Farm are taken into account. |

| Parties Raised | Sub-Theme | Issues Raised | Applicant's Response |
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| REP2-051(LIR), REP2-052(FWQ), REP2-053(WR), | ExA Q1 – Q1.3.9 Comments on the extent of policies identified with the site selection process. | Response: SKDC note the contents of this section of the Site Selection Assessment Report and agree that policy RE1 and the accompanying Renewable Energy Appendix 3 are the main policies of specific relevance in relation to Renewable Energy Development. However, SKDC would also consider other strategic policies to be of relevance in relation to a site selection exercise for the form of development proposed, namely policies SP1 (Spatial Strategy), SP5 (Development in the Countryside) as set out in the Council's Local Impact Report. | As a Nationally Significant Infrastructure Project, the application should be determined in accordance with the relevant National Policy Statements (EN1 and EN3). Although local policies can be important and relevant considerations, in the event of a conflict the NPS prevails.<br><br>It should be noted that the local policies referred to by SKDC were not designed to deal with impacts related to NSIPs, hence the requirement for NPSs, however the Applicant has demonstrated in the Planning Statement [APP-203] and Updated Policy Table [REP2-042] that it complies with local policy (Including SKDC's SP1 and SP5) where relevant.<br><br>For this reason, the primary policies influencing site selection were the adopted and revised draft NPS EN1 and EN3. |