Dear Ms Curtis,

Ref: Re-consultation for Cross-Boundary Planning Applications DC/20/05895 & DC/21/00060

I write to you on behalf of the members at CARE Suffolk to state that we **STRONGLY OBJECT** to the revised plans submitted by Bramford Green Ltd.

We have submitted detailed objections to each of the three previous public consultations. Whilst we welcome the removal of the northern parcel of land, this has not removed any of our concerns regarding the southern parcel of land. From the revised documents submitted, these remain the same as before.

Much has happened recently that gives a very strong indication that Parliament and Cabinet do not want to see solar farms such as this one being built.

Debates in Westminster Hall on 9th March 2022[1] and 8th June 2022[2] regarding solar farms like this one have had MP's highlighting the significant negative impacts of solar farms on communities, the landscape, our farmland, and our heritage, amongst other concerns. They feel that many policies in the NPPF 2021 are being side-lined and diminished in significance.

Furthermore, on 29th June 2022 the Minister Rt Hon George Eustice, at a hearing for the Environmental Audit Committee[3], stated that….

"I looked at this issue in some depth in about 2015 when we had something of a solar rush at that time. We agreed with the then MHCLG that its chief planning officer would issue guidance to planning authorities that created a strong presumption against solar farms on the best and most versatile land…"

And…

"We issued this guidance, as I said, about six or seven years ago and this problem was resolved for some time. We are conscious that there have been a few quite big schemes in recent months or over the last 12 months where planning authorities seem to have either forgotten or started to disregard that advice."[4]

That guidance[5], which has never been revoked or superseded, states *"The National Planning Policy Framework includes strong protections for the natural and historic environment and is quite clear that local councils when considering development proposals should take into account the economic and other benefits of the best and most versatile agricultural land. Yet, some local communities have genuine concerns that when it comes to solar farms insufficient weight has been given to these protections and the benefits of high quality agricultural land. As the solar strategy noted, public acceptability for solar energy is being eroded by the public response to large-scale solar farms which have sometimes been sited insensitively. Meeting our energy goals should not be used to justify the wrong*

[1] https://hansard.parliament.uk/Commons/2022-03-09/debates/22030973000001/LargeSolarFarms
[2] https://hansard.parliament.uk/commons/2022-06-08/debates/137D2865-E237-451F-8262-07923BDDC549/SolarFarmsAndBatteryStorage
[3] https://committees.parliament.uk/event/14051/formal-meeting-oral-evidence-session/
[4] We are aware that BMVL is actually 3a and above, and not the 3b and above stated in his answers, but this does not diminish the remainder of statement.
[5] https://www.gov.uk/government/speeches/planning-update-march-2015

development in the wrong location and this includes the unnecessary use of high quality agricultural land. Protecting the global environment is not an excuse to trash the local environment."

And, even more prominently, both final candidates for Prime Minister highlighted the need for solar farms to not be located on our country's best and most versatile land.

Rishi Sunak on 18th August 2022 wrote in The Telegraph *"We must also protect our best agricultural land. On my watch, we will not lose swathes of our best farmland to solar farms."*[6]

Liz Truss, our new Prime Minister, on 1st August 2022 in Exeter stated *"Our fields should be full of our fantastic produce…. It shouldn't be full of solar panels and I will change the rules. I will change the rules to make sure we are using our high value agricultural land for farming."*

It is clear from these debates and statements from Parliament and Cabinet, that planning applications such as this one, which is on over 75% BMV land, should not be permitted.

And all of this political guidance is supported by existing planning policy. Many of these are the same policies that were referenced by MP's in the debates above, and in the local development plan which we have referenced in previous responses to this application.

In addition to this, Suffolk County Council are strongly advocating for undergrounding of the EA GREEN overhead line and pylon project through the Gipping Valley SLA[7] and called for the recognition of this designation within the assessment.[8] The proposed EA GREEN project overlaps the proposed site of this planning application. BMSDC also showed concern for the SLA in its response to the same consultation. There is obviously not much point in protecting the SLA designation from the pylons, if the District Council go ahead and cover it with solar panels.

The application continues to:

- be sited within, and contrary to, the Gipping Valley Special Landscape Area;
- conflict with the characteristics of the Ancient Plateau Clayland and Rolling Valley Farmlands Landscape Characters of the area;
- be visible over wide extensive views due to the open undulating topography, despite mature hedgerows and tree lines already in place;
- be significant in terms of cumulative effects, both in combination and sequential to other proposed developments in the area, with no sequential effects assessed in the documentation;
- propose taking over 75% of productive BMV farmland out of food production for over 40 years, for which there is no evidence the construction phase would not harm the ALC grading of, despite evidence previously submitted to nearby application DC/21/01243 and DC/21/00683 (and repeated in Appendix A to this letter) that even temporary hardstanding harms the soil;
- be in view of and from, and harmful to the setting of, St Mary's Church Flowton a Grade 1 listed building;
- be in view of and from Flowton Hall, a non-designated heritage asset and discussed in our previous response to the 3rd public consultation on this application;
- omit any assessment of sequential cumulative effects as required in an ES;
- omit any alternative site studies as required in an ES;
- be utterly unrealistic in regards to transport and highways requirements and safety (for example nearby DC/21/05468 for a battery storage and substation predicts 487 heavy vehicle movements in total, but the CTMP for this application predicts a total of 480 heavy vehicle movements to construct the same PLUS an entire 30MW of solar panels and access tracks. This is not including worker movements during construction);
- ignore PROW users, such as walkers and horse riders for glint and glare assessment;
- demonstrate inconsistencies within the noise survey, and a lack of cumulative noise assessment;
- miss updated important wildlife surveys alongside other wildlife concerns as discussed in Appendix B to this letter;

[6] https://www.telegraph.co.uk/politics/2022/08/18/rishi-sunak-wont-lose-best-farmland-solar-panels/
[7] Paragraph 1.35 of the SCC response to the EA GREEN non-statutory consultation
[8] Paragraph 9.4 of the SCC response to the EA GREEN non-statutory consultation

- be lacking any acknowledgement and assessment of RAF Wattisham as a helicopter airbase and the glint and glare effect on the most common approach routes used by the military aircraft;
- propose to almost triple the greenfield runoff rate (from 0.58l/s to 1.4l/s) for the battery storage and substation area, and feed this into a watercourse which is already a high flood risk area, therefore increasing the flood risk elsewhere;
- raise concerns of safety regarding the battery storage units, namely the lack of water provision and hazardous materials entering the environment (through the air and soil) during a fire event;
- and as a result of much of this, it is incomplete in its requirements under EIA Regulations.

The words 'renewable energy' are not automatically synonymous with the words 'sustainable development'. A solar farm on this scale and in this location is not sustainable development.

We ask that Babergh and Mid Suffolk District Councils, in line with planning policy and very clear Government guidance, **REFUSE** planning permission.

Yours Sincerely,

Samantha Main

Chair

Appendix A: Harm to ALC grading and agricultural productivity of BMV farmland

The applicant continually claims that the development would not harm the condition of the soil at any time. Yet provides no evidence or case studies to substantiate this claim.

We have already established in previous responses to this application that there would be considerable compaction of the soil during the construction phase. This would be further exacerbated during the decommissioning phase. Mole drilling is going to be required to even attempt to return the land to agricultural use. Mole drills go down to a depth of around 2m. Any equipment (cables, posts, concrete, gravel, etc) left in the ground would inhibit any realistic chances of starting to recover the land.

When the cables for the EA1 and EA3 offshore windfarms were being laid nearby, considerably amounts of land were disturbed.

Where the cable route cross Tye Lane, and the trenches were carefully backfilled according to best practice, crops grown since remain patchy along the route. And significant drainage works were undertaken early 2021 to remediate unexpected drainage issues in the heavy clay soil that was caused by compaction of the heavy construction vehicles traversing it on a regular basis. Much like heavy construction vehicles will be traversing the proposed development to oversail the land with solar panels.

The applicant appears to underestimate the damage that would be caused during the construction phase. Damage which cannot be ploughed out like tramlines for agricultural vehicles can be each year, because of course the panels and cables will be in the way.

However, the most obvious damage to the soil during the EA1 and EA3 construction is where the temporary site compounds were placed. There were areas of compacted soil covered in aggregate, to create temporary construction compounds for storage of vehicles, materials, and worker welfare.

EA1 & EA3 cable site compound

The agricultural land was “restored” back to its previous condition of course, and has just finished its second year of planting. It had wheat growing on it as per the following photo which was taken on 8th April 2022.

But why are there some light patches and some dark patches? Well, the light patches are the footprint of the temporary site compound and access track and thus the “restored” land.

Here is another photo showing just how defined the difference is between the undisturbed land (dark green) and the restored land (light green) also taken on 8th April 2022. The crop on the restored land is 2-3 months behind in development compared the same crop in the same field but on land that is undisturbed.

Further evidence in how easy it is to damage the soil can be seen in part of the Enso Energy site as a result of the archaeological excavations. Top soil and sub soil was carefully removed and backfilled accordingly, yet light patches of poorer crop behind in its growth can now been seen where the trenches were dug. In some areas the compaction caused by the excavator tracks, where no soil was even dug up, has caused damage, much like the equipment that will travel all over the fields during construction and decommissioning.

Soils in this area have developed slowly over hundreds of years of agricultural practice. Even with the best intentions, this process cannot be matched in 2 years of growing crops. Considering this, we would question the claim that the project is fully reversible and that the BMV land can even be restored.

Appendix B: Biodiversity

1. A considerable range of legislation and planning and related guidance is relevant to the proposals in respect of wildlife and biodiversity. Much of this is summarised in the documents submitted with the planning application[9] and is not repeated here. In essence, the requirement is for developers to protect and enhance biodiversity and not to damage irreplaceable habitats or vulnerable species. ENSO claim that they would follow this guidance, but their claims are based on limited and patchy data and take no account of the substantial length of time that any proposed new habitat would take to grow and be populated.

Research done by the applicants is patchy and inadequate

2. Relevant surveys have been carried out by BSG Ecology, both in 2020 in respect of ENSO's original plans and again in 2022 for the revised plans. However, very limited additional desk research was carried out – primarily a search of the necessarily limited Suffolk Biodiversity Information Database. No account seems to have been taken of the advice from Natural England that "Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals" and that "… botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present,"[10] despite MSDC's Scoping Opinion asking that this advice should be followed, nor of SCC Ecology's clear statement that "Field and desk-top survey results must be adequate and up to date in accordance with Natural England Standing Advice, provide a summary of all species and habitats likely to be affected by the proposals."[11]

3. As a result, the baseline data that have been used in ENSO's biodiversity net gain assessment and in their proposals are extremely limited. No attempt seems to have been made, for example, to have sought information from the Suffolk Naturalists' Society or Suffolk Bird Group, both of which publish comprehensive annual reports based on reports made to county recorders; or from Suffolk Butterflies, which lists many butterfly sightings and maps these;[12] or from the Suffolk Moth Group, which records and maps moth sightings,[13] with 130,000 records in 2020;[14] or indeed from any individuals, of which a number keep detailed records of sightings in the areas affected by the ENSO proposal.

4. Furthermore, no updated bird survey was carried out in 2022.[15] This is contrary to the advice in the Chartered Institute of Ecology and Environmental Management's *Advice Note on the Lifespan of Ecological Reports and Surveys.*[16] The Environmental Statement says, somewhat glibly, that "The habitats within the area of the Proposed Development had not changed significantly between 2020 and 2022 and the application of the survey results from 2020 in the impact assessment is not a limitation since it is considered that the bird community will not have changed significantly."[17] That may or may not be true, but there is no evidence to support this statement. There has been at least one recent significant change in the breeding bird population in the area affected by the proposals in that Ravens now breed – a species hitherto rare in the east of England. Other new breeding birds could well be present, but these are simply airbrushed out of ENSO's picture.

[9] For example in Section 5 of the Environmental Statement Appendix 7.1, Findings of the Ecology Survey
[10] Natural England's response to EIA Scoping Opinion, 12 October 2020, paras 2.4. 2.5
[11] SCC Ecology comments on ENSO plan, 19.1.21
[12] www.suffolkbutterflies.org.uk
[13] https://suffolkmoths.co.uk/
[14] Recording Moths in Suffolk Facebook page, 3.2.21
[15] Environmental Statement Main Report para 7.14
[16] https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf
[17] Ibid para 7.19

5. The inadequacy of evidence provided means that it is impossible to tell whether any number of vulnerable species, especially perhaps of invertebrates, have been ignored by ENSO. Evidence provided by CARE Suffolk in its response to ENSO's original application suggests that this might well be the case. Records of species' presence do not, of course, necessarily indicate that they are breeding in the area - though there is evidence that many of them are - or would be directly damaged by the plans, but the scale of ENSO's omissions casts serious doubts on what they say throughout their papers and suggests that the damage these plans would cause would be much greater than ENSO claim.

6. ENSO also completely ignore the potential impact of the two other current proposals for solar installations in the immediate area. Natural England clearly say that "consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area," but ENSO completely ignore this advice. Instead, they simply say that, because they feel that their own development "does not give rise to any residual adverse impacts on ecology / biodiversity receptors. As a result, it can be concluded that it could not give rise to a cumulative impact since it is making no contribution to such a cumulative impact."[18] This is an astonishingly glib and wrong statement.

7. It is difficult from the outset, therefore, to take ENSO's claims about biodiversity improvements at all seriously, given the almost complete lack of understanding of the current situation that they show.

Unreliable conclusions in the planning application

8. The developers claim that their proposals would "deliver a 159.35% habitat net gain and a 64.69% net gain in hedgerow biodiversity value."[19] Such spuriously accurate claims would ring alarm bells with any competent statistician.[20] Little or no information has been provided on a number of key variables, such as the rate of growth of new habitat to a condition that would be attractive to wildlife; the time that wildlife would take to colonise newly-planted habitat; the true biodiversity value of existing habitats before they are damaged during the planned construction phase; and so on. There is considerable doubt whether some of the mitigation measures proposed would be successful, or to what timescale they would be effective, so it is impossible to tell when any possible gains (however calculated and however accurate) might be realised. It is quite possible – given the damage that would be caused during the lengthy construction period, and the inevitable displacement of many species - that there would be no real gains for many years, if ever.

9. There is, anyway, considerable and increasing scepticism about these calculations which have been described as an "ecological accounting scam based on a highly questionable and debunked system of metrics involving deliberate misclassifying of habitats."[21] The fundamental problem is that the metrics are calculated and quoted – to ludicrously unrealistic and therefore spurious degrees of accuracy – without any reference to many caveats, some of which are included in the metrics documentation itself. So, for example, indirect impacts of a development are not taken into account; species are not explicitly included, but habitat types are used as a proxy for so-called biodiversity value; any results need to be interpreted using ecological expertise and common sense; and so on. As a recent expert study concludes, "we now have the chance to peer under the bonnet at what these biodiversity gains actually are, and many of these come in the form of habitats which might score a lot of 'biodiversity units', but are unlikely to improve English biodiversity in an ecologically meaningful sense."[22]

10. Although some of the enhancements and mitigations that ENSO propose may have some value, and doubtless contribute to the apparently substantial biodiversity net gain that the metric produces, the reality is that these

[18] Ibid para 7.161
[19] Non-technical summary para 4.4
[20] The author of this section is a Fellow and former Vice-President of the Royal Statistical Society.
[21] Suffolk Bird Group *The Harrier* Spring 2022 *page 16*
[22] Sophus zu Ermgassen and Dr Joseph Bull, researchers at the Durrell Institute for Conservation and Ecology at the University of Kent at wcl.org.uk

enhancements do not necessarily possess real ecological properties such as connectivity with surrounding habitats. What's more, it seems likely that there is a significant governance gap that is likely to undermine claimed net gain – a lack of monitoring and enforcing the implementation of habitat enhancements within developments. Local authority guidance advises councils not to take enforcement action unless the violation results in a 'serious harm to a local public amenity'. In most cases, a failure to deliver the appropriate quality or type of habitat within the development footprint will not fall under this category. Indeed, given the opacity of the net gain calculations, it will be hard (if not impossible) to work out how and where the apparent gains are supposed to be realised. As such, claims such as ENSO's will be essentially unenforceable – there is no guarantee that there will be genuine biodiversity gain at all, while at the same time it being certain that many natural habitats will be seriously damaged during the construction period and subsequently. If the application were to go ahead, a condition should be that biodiversity changes should be monitored and publicly reported and that the developers' biodiversity management plan should be amended if the gains claimed now were not realised.

11. Furthermore, as one of the fundamental principles underlying the biodiversity metric states, "metric design aims to encourage enhancement, not transformation of the natural environment. Proper consideration should be given to the habitats being lost in favour of higher-scoring habitats, and whether the retention of less distinctive but well-established habitats may sometimes be a better option for local biodiversity. Habitat created to compensate for loss of natural or semi-natural habitat should be of the same broad habitat type … unless there is good ecological reason to do otherwise."[23] In this context, it is highly questionable whether the new hedges and other mitigations proposed by the developers would really lead to gains compared with retaining the current slowly evolving habitats, shaped over centuries by local farming practices, where wildlife, soils and vegetation are in harmony – especially when they would be accompanied by masses of fencing surrounding enclosed areas and permanent industrial noise.

12. The developers plan new hedgerow planting along Public Rights of Way in order to "screen and filter close views to the Proposed Development where possible."[24] Any such planting would take a considerable time to grow before it was at all effective and, until that time, there would be no effective screening of the panels, inverter/transformer units and battery storage containers, with tree guards damaging the visual impact even further. This casts further doubt over the extent to which there would be any genuine biodiversity gains, let alone any visual protection for walkers and others using the Public Rights of Way.

13. To illustrate this point, the picture below shows supposedly remedial hedge planting from the EA1 underground cable where it crosses Tye Lane, close to the proposed ENSO site. This shows virtually no growth at least two years after planting.

[23] Natural England *Biodiversity Metric 3.1 User guide* Principle 5, page 13
[24] LEMP Objective 6, page 18

14. Some (possibly a substantial proportion) of the biodiversity gains claimed by the developers would result from the proposed nature area in Field 5. It is unclear whether this would be retained after the decommissioning of the project or would revert to agricultural land. If permission were to be granted, there should be a condition that it, along with any other enhancements planned to improve biodiversity, should never be dismantled.

Impact of the construction period

15. The net gain calculations do not give a full picture of what could be catastrophic habitat losses during the construction and early operating years of the solar installations, when some species could be driven out of the area for ever. The biodiversity spreadsheet shows that the current baseline situation has a substantial biodiversity value – the 31 hectares of cereal crop delivers 63 habitat units, for example.[25] These would be instantly lost once construction started and not recovered or enhanced for many years. And, even if there were gains in the long run, these would be
lost when the life of the installation came to an end and the land returned to arable production.

16. A minimum 40 week construction period (which experience shows is likely to over-run), during which there would be considerable noise,[26] would do considerable harm to landscape, habitats and breeding wildlife which in some cases could be irreversible. The Suffolk Biodiversity Validation Requirements[27] show that the key seasons for the main species likely to be impacted by the ENSO plan cover, between them, every month of the year. It is disappointing that no Construction Ecological Management Plan has been submitted which makes it impossible to know what is suggested to mitigate this damage. The developers suggest[28] that there should be a pre-commencement planning condition that ground clearance should be conducted outside the bird nesting season, but this does not go far enough. Any condition should be much stronger and apply to all the vulnerable and protected species that this development would affect, and apply to hedge removal and any other impacts (including noise) as well as to ground clearance.[29]

Wasted public money

17. The fields on which the proposal is sited have been farmed with deliberate intent to encourage wildlife and biodiversity for more than 20 years.[30] This has included new hedging; the creation of wildlife areas; and the encouragement of field margins and scrubby corners which help wildlife, but which would be removed under the ENSO plans. In recent years, the same fields have been farmed under the Defra Countryside Stewardship Scheme, for which public money has been used to promote significant habitat improvements alongside crop production.[31] The accumulated benefit of many years of publicly-funded work would be wasted if these fields were turned into a solar installation, with biodiversity losses rather than gains in the short- and medium terms at best.

18. The Enhanced Land Management Scheme (ELMS) is the "cornerstone of the government's new agricultural policy" which will, from this year, mean that "farmers and other land managers may be paid for delivering the following public goods: clean air; clean and plentiful water; thriving plants and wildlife; protection from environmental hazards; beauty, heritage and engagement with the environment; and reduction of and

[25] Biodiversity Net Gain spreadsheet Worksheet A1, cells H11, Q11
[26] And potentially artificial lighting, if there is any construction work during shorter daylight months.
[27] https://www.midsuffolk.gov.uk/assets/DM-Planning-Uploads/Suffolk-Biodiversity-Validation-Requirements.pdf p4
[28] Environmental Statement para 7.73
[29] See National Solar Centre *Biodiversity guidance for solar developments*
[30] See, for example, John Cousins *Linking landscapes – the farmer's role* (http://www.suffolkbis.org.uk/node/77)
[31] https://magic.defra.gov.uk/magicmap.aspx

adaptation to climate change."[32] The results will be monitored and failure penalised. This scheme should be attractive to the owners of the land on which ENSO propose to build. ENSO's limited proposals on biodiversity would provide less, would not be monitored, and are designed to mitigate something which is unnecessary and would additionally take a large area out of valuable agricultural production. Leaving the fields as they are, and developing them under ELMS, would be considerably more effective.

Dangers of fencing

19. If approved, the site would be surrounded by high fencing. Although some routes for smaller mammals would be provided through this, the evidence for the effectiveness of such gates and gaps is mixed.[33] Furthermore, the creation of fenced areas and corridors (such as the footpaths across fields) would likely have a number of impacts on the wildlife that currently lives and breeds in the area, beyond the direct damage to their habitats. It would remove or reduce animals' access to their natural areas for grazing and hunting, and also to important water sources available in the on-site ponds. And it would drive larger animals (in particular deer and badgers) onto the narrow lanes – where the development would inevitably make drivers' sight lines worse – risking damage to both animals and to vehicles and their occupants, and into gardens, with resultant damage to plants, fruit and vegetable and lawns. There is also evidence that such fencing can act as a trap to deer and cause them injury.[34]

Some individual species

20. Badgers. The application concludes that there would be no significant effect on badgers.[35] But it takes no account of the impact that badgers could have on the development. In 2018, Flowton Road collapsed due to badgers digging a sett underneath it, and was closed for several months as the County Council ruled that repairs could not proceed until the badger breeding season had finished and Natural England issued a licence.[36] Badgers are determined to dig, but there is no mention in the planning documents of the potential impact of badgers digging under the anti-deer fencing and solar panels, or of the damage and pollution that could bring about.

21. Brown Hare. Hares breed in the fields that would be developed, but would be driven from their breeding sites by the plans, not least as sheep might (or might not) be grazing there.

22. Skylark. It is clear that the proposals would severely damage the local breeding population. The developers say that "The surveys identified four skylark territories within the arable fields that are to be developed with solar arrays and battery storage. The area covered by the built development is such that during the operational phase only one skylark nesting territory is expected to be maintained."[37] ENSO claim that this damage would be mitigated by new grassland creation, but there is no evidence to support this assertion.

23. Bats. The only information on bats provided by the developers is from desk research which, as paragraph 3 above shows, is seriously limited. There has been no attempt to survey bats in the area, despite the recommendation for this in official responses to the scoping opinion.[38] While some welcome mitigation measures are proposed, it is impossible therefore to say whether they are adequate. The commitment that "Construction will be timed, where possible, to minimise night-time working to minimise disturbance to bats. Artificial light to

[32] DEFRA *The Environmental Land Management Scheme: Public Money for Public Goods* 14.10.20
[33] See, for example, Huijser et al *Construction guidelines for wildlife fencing and associated escape and lateral access control measures* Western Transportation Institute – Montana State University, 2015
[34] Photographic evidence is available of the impact on Roe Deer from similar fencing at Bramford sub-station
[35] ES Chapter 8 para 2.46
[36] https://www.eadt.co.uk/news/motorists-ignore-warning-signs-after-badger-family-set-up-camp-2437752
[37] ES para 7.142
[38] Place Services response to EIA scoping request, 4.11.20

aid construction will be minimised with that present designed to minimise light spillage outside active construction areas."[39] is not likely to be effective, given that the construction period would inevitably include many days with limited hours of daylight. No mention is made of the limited evidence that some bats are more prone to fatal collisions owing to mistaking solar panels for water to drink.[40] No evidence has been provided of the potential impact of noise from the inverter/transformer stations and battery storage units on bats, which use ultrasonic sound for navigation and hunting. Evidence should be provided and mitigation measures proposed if necessary.

Trees and plants

24. It is disappointing that no suggestions have been made for planting climbers on the proposed security fencing.[41] Plants such as honeysuckle, clematis and blackberries are good nectar sources and would provide additional screening. Such planting could be a condition of planning approval.

25. The planning documents suggest that the fields might be grazed by sheep, but there appear to be no grazing management or animal welfare plans (there are no buildings or water provision supporting the welfare of sheep adjacent to the site nor on the site), nor are there any provisions in the transport plan (such as arrival and removal of sheep or visits to the site by a shepherd). No account has been taken of the need for grazing to be stopped for periods of the spring and summer – preferably from April to September – to allow plants to grow;[42] or of the negative impact that sheep grazing has on moths, as the grass gets too short.[43] All these factors would need to be taken into account in any planning conditions.

26. It is unclear whether there would be any need to remove or control vegetation during the proposed construction period, for example for access roads. If any such work were to be needed, it should take place outside the bird nesting season, consistent with the rules for farmers which state that "you must not do any work which might harm nesting birds or destroy their nests. You'll usually find nesting birds during the main nesting and breeding season from 1 March to 31 August."[44]

Conclusion

27. The developers sugar-coat their proposals with some new planting of hedges and trees, and and small 'wildflower nature area.' These might be positive developments in some respects, but they would be hugely outweighed by the short- and long-term damage to the area. Any positive impacts would be negated by the noisy low hum that would come from the six inverters, which would be off-putting to both animals and people used to a quiet walk. More generally, some new habitats would be created, but other existing habitats destroyed or damaged either temporarily or permanently. There might, in time (possibly a very long time) be some increased populations of certain species – mostly common ones – but any enjoyment or indeed visibility of these would be limited at best. Wildlife and biodiversity in the area would far better be served by the current situation, in which both farmed and unfarmed areas support a wide range of animals, birds, invertebrates, plants and trees in their historic natural context.

[39] Environmental Statement Main Report 8 para 7.73
[40] https://environment-analyst.com/global/76375/ecologists-review-impacts-and-opportunities-from-solar-farms
[41] As recommended by the BRE National Solar Centre in their Biodiversity Guidance for Solar Developments p4
[42] National Solar Centre op cit
[43] Butterfly Conservation Webinar 17.11.20
[44] https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management#check-if-you-can-work-on-a-hedgerow