



Date: 23rd June 2023

Dear Ms Curtis,

We apologise for the lateness of this reply, and hope that our concerns will still be considered.

We note that the new documents submitted on 25th May 2023 fall into two categories:

- Ecology responses for woodland and general ecology response
- Cumulative Impact Assessment comprising four maps, visualisations, and an assessment

We wish to comment on both categories in more detail below.

Ecology

The ecology responses are generally in response to consultee comments, and for the majority we will allow the consultees to respond. However, we have concerns regarding Skylark which we are compelled to point out. Not least because of the significant adverse cumulative impact that the species will suffer from so much habitat loss from this and other proposals.

We note consultee comments that the current site appears to support 12 Skylark nesting territories.

The applicants' comments are in red below:

At this stage, it is difficult to prove that the additional value in foraging provided by the new planting mix can offset the reduction in nesting areas from the introduction of PV cells but monitoring of Skylark activity on and around site post-construction with appropriate/additional habitat management actioned if Skylark numbers fall.

We welcome the honesty at the start of this paragraph. It is refreshing to see. An increase in foraging does not necessarily correlate to an increase in nesting spots around the area, and it is the **nesting habitat** which is of concern here. Without an assessment of the surrounding areas it is impossible to even being to gauge what sort of numbers could be displaced into the surrounding areas.

The evidence presented previously notes that a 2016 study on The effects of solar farms on local biodiversity: a comparative study (Montag, Parker and Clarkson) found that across 11 solar sites (all of which had been completed for at least one growing season) and 11 control sites across southern England, that at only one of the 1 pairs of sites was the number of skylark territories within the control plot significantly higher than at the solar plot.

The same paragraph continues to say "However, only one confirmed nest was identified within a solar plot (at Site 10, the highest overall ranking site when looking at all indicators). The nest was situated outside of the footprint of the array but within the security fencing surrounding the site in an area of grassland measuring approximately 40x90m.

However, there appeared to be a reduction in the use of the solar site for specific nesting activities. A strip of around 70m width will remain present through the centre of the site which is approximately 375m long. This means a strip of 70m x 275m at greater than 50m from hedges and pylons is present. This area will be managed with Skylark in mind during the lifetime of the project and success of this area for nesting skylark monitored to further ensure no negative

impact on breeding Skylark. The additional tree planting will be confined to the site boundaries where hedgerow are already present and the planting is therefore unlikely to impact nesting Skylark.

The Suffolk Wildlife Trust comment that this is in response to notes "The countryside stewardship schemes advice on creating skylark plots recommends that they are located at least 50m away from structures such as trees and field boundaries."

The 2.5m height of the solar panels that will line the proposed 70m wide strip are in some cases taller than field boundaries, therefore presenting new perch opportunities for predators along the entire length of the 70m gap. The study that the applicant referenced above indicated that solar farms had the potential to increase numbers of raptor species. A 50m distance would potentially render the entire length of the gap unsuitable for Skylark.

The additional tree planting will be confined to the site boundaries where hedgerow are already present and the planting is therefore unlikely to impact nesting Skylark.

We would not disagree with this statement.

We understand that the applicant never sought their own EIA Screening nor Scoping Opinion from the Council, instead electing to take on the Scoping Opinion that was given to Bramford Green Limited around the same time under DC/20/04125:

*"The development may have potentially significant effects on Protected and Priority species and so this topic **IS** required to be included in the ES.*

The applicant should assess the likely impact of the proposed development on protected species and their habitats via appropriate survey / assessments having regard to the Natural England standing advice and appropriate pre-application consultation. The information submitted shall include mitigation measures together with opportunities for enhancements to be incorporated in to the development.

The applicant should provide sufficient information to enable the LPA to discharge their duties under the EC Habitats Directive.

Refer to: NPPF, policy CL8 of the MSDC Local Plan 1998, policy CS5 of the MSDC LDF Core Strategy DPD 2008 and policies FC1 and FC1.1 of the MSDC Core Strategy Focussed review 2012.

Consultation responses from Natural England, Suffolk Wildlife Trust and MSDC Ecology Officer (Essex Place Services)."

Skylark are a protected species. Removing 12 Skylark nesting habitats, with no study to show they could be accommodated in the surrounding areas, with no guarantee the increased foraging would support an increased density in the surrounding areas, and with no guarantee that any of them would be accommodated on site in the gap would not allow the Council to discharge its duties under the EC Habitats Directive, and would be in conflict with the planning policies listed in the Scoping Opinion.

Cumulative Impact

Cumulative impact continues to be a major concern for residents and it should be obvious why, so we welcome the willingness of the applicant to update its Cumulative Impact Assessment Scenario 3 to include Greybarn Solar Farm, which was a previous omission we raised.

Viewpoints & Visualisations

We welcome the two new viewpoints A & B, and updated viewpoints 7 & 9.

Viewpoints 1, 5, and 6 on the CZTV show there is a possibility of visibility of all 3 solar proposals. However, we agree that there would not be visibility of all three proposals from these three viewpoints, and so no update was needed.

The assessment for viewpoint 7 in Table 2 is incorrect, as demonstrated previously with photographic evidence in our response on 6th December 2022. Greybarn AND Tye Lane would both be visible at the same time during the

winter months. This would be limited and we agree it would not change the applicants' assessment of significance, but the visibility should be represented accurately in the assessment.

Table 1 for viewpoint B has omitted walkers, cyclists and horse riders from its list of visual receptors. Viewpoint B is on Tye Lane, which is a designated Quiet Lane and National Cycle Route 48. These types of users regularly use this route and they must be recognised in the assessment, which they currently are not. **In Table 2 they would have a sensitivity of high/medium, which would lead to an adverse change of major/moderate+ significance.** This is a significant omission in the report.

Landscape Character and Fabric

Landscape character is defined as the *"distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse."*¹

The landscape fabric can be described as the physical elements and combinations of these elements that make up the landscape character.

The dominant landscape character for all three proposals is Ancient Plateau Landscapes, which are described as *"Flat or gently rolling arable landscape of clay soils dissected by small river valleys."* The landscape fabric includes various elements such as the arable fields, hedges and trees, and very little mention of development.

For the existing landscape fabric the development itself would not have a significant impact on the hedge and tree elements, and it would have a beneficial impact on new hedge and tree planting if it were to successfully establish. Though there appears to be no reason why those benefits could not be implemented without the solar farm. However, the solar farm would have a significant effect of change on the arable field element, turning it into grassland under solar panels.

The development also seeks to add a large number of solar panel arrays sprawled across the landscape, which would introduce a new element into the landscape and would make the existing landscape character radically different. Over such a large area the proposed developments in such close proximity would become a key and defining characteristic of the landscape, it would strongly contrast with the existing character, and the key characteristic of a rolling arable landscape would be lost for more than one generation. There is nothing to rule out that impact being permanent. The industrial features of the development would not assimilate into the existing landscape at all, it would overpower it and become a new industrialised landscape. This would be significantly harmful to the existing landscape character.

Special Landscape Area

At paragraph 39 of the Scenario 3 assessment the applicant writes:

"As the policy associated with the SLA seeks to protect the designation from development within it, rather than at a distance from it, and given that the Tye Lane proposal is located at least 400m from the designation where effects on landscape character are not expected to be significant, it is considered that no significant cumulative effects on the SLA would occur as a result of the Tye Lane proposal."

We agree that policy CL2 seeks to restrict development within the SLA, rather than nearby it. The proposal is indeed in a pocket of land that is not within the SLA itself, though it is surrounded by nearby SLA on all sides. However, since the SLA borders on the map are not marked by boundaries on the ground; the development is adjacent to other proposals which are in the SLA boundary; and the significant change that would occur to the landscape character as a result of development; we do not agree that it would not have a cumulative impact on the perception of the SLA areas. Whilst policy CL2 is not applicable to this development, other policies that intend to maintain and enhance the landscape do still apply, and this development would be contrary to those.

Long Distance Recreational Routes

We welcome the recognition of National Cycle Route 48 along Tye Lane and the statement *"the close proximity of these views and the recurrent nature of the visibility of solar panels would result in a significant cumulative effect on*

¹ Glossary, Page 157, GLVIA, 3rd Edition

cyclists along this route.” Though we disagree with the next statement that once mitigation is established the effect would no longer be significant, because the mitigation proposed is of a deciduous nature and during the fall, winter, and early spring months the development would be very perceptible still.

Local Public Rights of Way

We welcome the recognition of the significant adverse cumulative effect on users of the rights of way across the landscape. However, again we disagree with conclusion that as screening matures the impact would be limited. PRow users travel much slower through the landscape, and as such they are more perceptible to what is around them. Gaps in the screening will not pass by in a blur. Even during the summer months when the screening is in full leaf, the solar developments would be perceptible.

What is more concerning is that the applicant fails to recognise the impact on footpaths Bramford 8 and 8A, for which they have proposed NO screening. These are connecting footpaths to each other, and longer connecting routes to the villages of Bramford, Somersham, and Little Blakenham, as well as Little Sage Hill campsite. The adverse impact would not reduce at all over the lifetime of the development for users of the PRow.

Conclusion

Skylark continue to be an ecology concern for us and we recognise the potential for increased foraging. However, as the applicant points out this does not guarantee the alleviation to the loss of nesting habitat, and thus a loss overall for the protected species. Without a breeding bird survey of the neighbouring fields there is no indication that they could accommodate the displaced nests.

Cumulative impact continues to be a major concern and we are disappointed that the focus remains on fixed points across the affected area and whether more than one solar farm can be seen at the same time. Even if users of the area do remain stationary at one spot, they still have to get to and from the spot. We are pleased to see the beginning of an admittance that those travelling through the area would have a significantly altered experience, but as from our comments above receptors have been excluded and the effects downplayed.

Given that cumulative impact is such a contentious issue for local residents and Parish Councils, and it is difficult to understand the issue from static photos shown on a laptop screen, we invite Officers and Councillors to go on a walk with us through the landscape.

Whilst we welcome the additional information, and in particular an updated Cumulative Impact Assessment, it does not address our previous concerns, and we continue to ask Mid Suffolk District Council to **REFUSE** the application.

Yours sincerely,



Samantha Main

Chair