

From: [REDACTED]
To: [Cleve Hill Solar Park](#)
Subject: Deadline 5 submissions
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Attachments: [REDACTED]

Please find attached a couple of documents submitted for Deadline 5 for EN0100085.

Kind regards,

Greg

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Cleve Hill Solar Park

DCO Application Reference EN010085

Deadline 5 submission

Summary of oral representations given at Issue Specific Hearing 6 by

Kent Wildlife Trust

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Carrying Capacity of AR HMA for Brent goose

The revised calculations for the carrying capacity for the AR HMA with regard to Brent geese that take into account the necessary avoidance of spreading manure within 10m of the ditches has resulted in the carrying capacity being 360 bird-days short of the mitigation target. Kent Wildlife Trust sticks to the principle of meeting the mitigation target.

Ivermectin-free Manure

The outline LBMP goes no further to secure ivermectin-free manure as the phrase 'where possible' is not defined, and could incorporate a wide range of situations. This includes the actual availability of ivermectin-free manure, which we can appreciate cannot be quantified at this time, and the financial implications of using it.

As stated in our answer to ExQ2.1.7 the applicant's preference for using ivermectin-free manure is in order to 'avoid an adverse effect on invertebrates'. Given that plovers feed on invertebrates this raises uncertainty with regard to the management of Brent geese compromising the carrying capacity for lapwing and golden plover. We have requested that whether or not the manure used in the AR HMA is ivermectin-free or not be a variable recorded to assist with monitoring, alongside invertebrate biomass.

Lapwing and Golden Plover Carrying Capacity Measure from Gillings *et al.*

We confirm that as Dr Gillings has confirmed that the figures for lapwing and golden plover carrying capacity from his study can be combined, this particular issue has been dealt with.

Timing of AR HMA establishment

With regard to the timing of establishment of the AR HMA as detailed within the LBMP, this is still an issue that requires 'correction', and we will be providing further suggested changes to that document to the applicant as requested.

Grazing of Grazing Marsh Grassland and AR HMA

The revisions to the LBMP appear to be acceptable, but they relate to other parts of the LBMP which have been discussed elsewhere and require changes, for example the role of the HMSG.

We were aware of the flexibility within the LBMP to allow either cutting or grazing to achieve the desired sward height. This flexibility may work in association with issues relating to cattle and ivermectins.

Triggers with the LBMP

With regard to triggers and the LBMP, things are moving in the right direction, though further changes are still necessary. The HMSG attempted to deal with as many of the issues as possible. We welcome the applicant's willingness to make further changes, including on the role of the HMSG.

Remedial measures for marsh harrier

The behavioural response of marsh harrier to the development is an unknown. If it is negative the LBMP does not provide any remedial measures that can address it.

There are still changes required to the LBMP with regard to triggers and remedial actions. For example, a suggested remedial measure is to adapt the survey methodology – this is not a remedial measure, as survey methodologies will need to be robust enough to monitor changes from the start. We are also conscious that the presence of the development will make it harder to monitor the marsh harriers, owing to their hunting behaviour.

As this is a unique project, we have nothing to compare it to with regard to marsh harriers' reaction their reaction, and the success of the mitigation remains an uncertainty with no remedial measures in LBMP. The applicant has done what they are able to do within the constraints of the development design. We provided a hypothetical example at the HMSG that if marsh harriers were seen to use a minimum width of corridor decommissioning of solar panels to ensure that all corridors were of this minimum width could be undertaken. Essentially what would be needed would be to increase the available habitat.

Further Detail in LBMP

As per our response to ExQ2.1.6 and 2.1.8 we are happy with the further detail with regard to the grazing management and water level control.