

## Response to PVDP

I wish to raise the following in relation to the applicant's response to my previous concerns raised.

### **Ecology**

As a biodiversity specialist of more than 30 years, with a demonstrable (and independent) record in ecological impact assessment, I felt well placed to undertake an assessment of the likely impacts of this proposed development. In keeping with other key areas raised in this consultative process, the applicants have done little, if anything, to address concerns raised post PEIR and beyond. In all honesty I am astounded by both the disregard for the ecological impact of the proposal and the naivety of the responses from the applicants to address the concerns raised. In particular, I fail to see how they seriously think that any species-specific negative impacts experienced will be more than offset by Biodiversity Net Gain (BNG) which has no precautionary principle enshrined within it – it is a habitat removal-based algorithm which takes no account of the actual factors that make the habitat attractive to wildlife. A good example of this are hedgerows (which have their own legal regulations incidentally) which owe their ecological functionality to a complex interplay of biotic and abiotic factors, of which age and connectivity are key. As the proposal makes clear – significant amounts of hedgerow will be impacted, both directly and indirectly. So simply stating that the development will remove X amount of hedgerow (usually measure in metres or kilometres) but will be mitigated by the planting of X amount + Y% increase cannot be viewed as “like for like”.

This development, if given planning permission, will very likely seriously impact floral and faunal diversity. For the numerous protected/red-listed farmland species the site supports, I continue to have significant concerns surrounding those raised in my initial response to the PEIR and beyond, especially for bats and farmland birds. Rather conveniently, we await the provision of a technical note on bat mitigation measures where, one would assume, we obtain clarity as to how bats will be monitored pre and post development and what will happen if, for example, it is demonstrated that bat populations/species are negatively impacted by the development. Why this has not already been produced is simply beyond me – every species of bat in the UK is protected under wildlife law. It is unacceptable to effectively agree mitigation after the development is given consent. I have similar concerns surrounding the inadequate provision of mitigation measures for the suite of farmland birds the overall footprint of the development will impact. The mitigation emphasis centres upon one species (skylark) for which “plots” have been identified, some of which will be too small to support skylark territories. For the larger ones, should they work as a mitigation intervention, at best they will only support around half of the current population of skylarks that the development will displace. To conclude, globally the UK resides in the bottom 10% of the most nature-depleted countries. This proposal will only move them further down the ranks.

### **Flood risk.**

My overall concern here is that there would appear to be nothing new from the applicants, in that they have failed to address my concerns previously raised post PEIR. I indicated that there was need to explore appropriate flood risk modelling which is predicated upon the need for water infiltration testing. This has not been carried out, without any justification for its exclusion, noting here that the Examiners supported this suggestion in their report. I therefore continue to question why the applicants have not adequately modelled their proposed mitigation, and perhaps more worryingly, why they have not produced a detailed design of any mitigation measures for the likely increased flood risk the development will pose? This design cannot be simply “bolted on” post consent and to support this is a dereliction of duty by all involved in the plan-decision making process surrounding

this development. To conclude, the applicant has persistently refused to address the need for appropriate flood prevention measures in relation to this development. Why this matters personally, is that the village I live in, and those adjacent to it, have a long history of flood-related events and the development as proposed does nothing to avoid areas of high flood risk.

#### **Data/literature cited**

It is disappointing in the extreme to see the applicant's response to concerns raised littered with both qualitative and quantitative data/information which owes its origins to non-peer reviewed sources, some of which are directly linked to industry and therefore have a degree of bias. A useful example of this is the Jarvis (2021) report, which is presented to support the assertion that there will be negligible impact upon house values post solar development. However, a not that difficult examination of the literature to support this assertion, reveals that most of the casework cited actually relates to wind farms. This is misleading and speaks to the disregard the applicants have for those of us involved in this consultative process. Further examples are located when we look at the data provided surrounding the socio-economic impacts of the development. "1300 ha of agricultural land equates to 8 full-time jobs". No account taken here of supply chains – misleading. "424 FTE jobs will be created". Delve a little deeper and it is revealed that only 18 FTE's will result post construction i.e. in the decades that the farm will operate. Again – misleading, speaking to the disregard the applicants have for those of us involved in this consultative process.

#### **Finances associated with the proposal**

In all honesty, I am all agog to see/hear a transparent narrative which details the finances raised to undertake this development. I am aware that concerns continue to emerge in relation to the legitimacy of the funding for the proposed development which surely must be raising eyebrows in the upper echelons of Government? In addition, if my understanding is correct, PVDP will get the proposal "ready" for selling on to whoever bids. I have serious concerns that there will be no checks against the conditions imposed as part of the PVDP planning consent once the development resides with a new owner as they will add significant cost to the running of the development. I await assurances against this concern.