

Submission ID: S458F392F

PLEASE FIND ATTACHED A COPY OF MY MAY 6TH 2026 ORAL SUBMISSION, CLARIFICATION OF MY QUESTIONS FOR THE APPLICANT/THE PLANNING INSPECTOR ANTHONY JOHNSON ESQ. AND MY REQUEST TO GIVE FURTHER ORAL INFORMATION AT THE NEXT HEARING SCHEDULED FOR W/C. SEPTEMBER 7TH 2026.

My name is Dr MARK HOLMES (6 or 7 minute expanded/updated submission re. Stone Curlews & Biodiversity).

I am a recently retired medical doctor with a lifelong involvement in nature conservation. I am a Fellow of the Linnean (Natural History) Society of London & also a Trustee of the Swallowtail & Birdwing Butterfly Trust.

I have lived in Southacre for 30 years - so I have first hand knowledge of the amazing natural history & biodiversity of this area, an area consisting of unique Breckland habitat and the internationally important River Nar chalk stream SSSI.

I want to clarify that this proposed industrial-scale droves solar farm has the potential to seriously damage this very same area of sensitive & highly important habitats, that is both continuous with and FUNCTIONALLY LINKED to the nearby BRECKLAND SPA – the Breckland Special Protection Area.

The TWO very strong & legitimate OBJECTIONS AGAINST the droves solar project that I would like to brief you on & update you on today ARE ;

1/ The presence of the very rare & fully protected STONE CURLEW bird species on this proposed solar farm site – Stone Curlews were recorded here in both 2024 & 2025.

& 2/ The already impressively HIGH BIODIVERSITY but still increasing BIODIVERSITY levels, PLUS future BIODIVERSITY POTENTIAL, of this site which could be irreparably damaged by this massive solar farm project.

I will now aim to succinctly talk about STONE CURLEWS followed by BIODIVERSITY issues...

FIRSTLY regarding Stone Curlews. This extremely rare (circa 300 breeding pairs in UK) bird species is a fully protected Schedule 1 British breeding bird – protected under the Countryside & Wildlife Act of 1981. Multiple sightings of Stone Curlews have now been made in the Droles Solar farm project area IN 2024 AND 2025.

In 2025 a pair of adult birds was seen in the Spring, and then an apparent FAMILY party of 4 birds was seen that Autumn. This is consistent with successful breeding of a bird species that is known to be very illusive. Terry Jermy local MP for South West Norfolk, in his excellent submission, pointed out that because of crop rotation birds may move with this rotation & hence only be recorded at a particular site every 4 or 5 years. (Indeed our Stone Curlews may well move between the Droles project area and the nearby Breckland SPA, Special Protection Area).

I would therefore propose that FOR the Droles site a minimum of 5 years of professional & licensed Stone Curlew recording work is carried out to confirm (or exclude) Stone Curlew breeding on this site, BEFORE any final decision on the Droles Solar project is made.

SECONDLY I would like to comment regarding the already HIGH and increasing levels of Biodiversity of this proposed Solar farm site. The combination at this site of both important Breckland habitat which is FUNCTIONALLY LINKED to the nearby Breckland SPA (Special Protection Area) plus the proximity of, & continuity with, the River Nar SSSI ensures an outstanding level of biodiversity. (The whole Breckland area is of course known to be a biodiversity hotspot).

Many protected & scarcer species have been recorded in the immediate area of the planned Drovers solar project. MAMMALS include Red Deer, Otters, Polecats (a protected species which arrived in last 5 years), Harvest Mice, Water Voles, Hares & Badgers. As well as Stone Curlews, BIRDS recorded include the larger Eurasian Curlew (Breckland being one of the most important lowland breeding strongholds for this species in the UK), Lapwings, Cuckoos, Spotted Flycatchers, Barn Owls, Quail, Goshawks, Kingfishers (breeding on or near the River Nar), Green Sandpipers & Crossbills. 31 species of BUTTERFLY have been recorded including the recent arrival of the rare Purple Emperor butterfly (this is more than half of the British Butterfly list). Other INSECTS include the localised Green Tiger beetle & many species of solitary bee – at least 2 solitary bee species have only recently arrived in Southacre & formed large breeding colonies.(Solitary bees are of course very important pollinators). I believe the FLORA of the area is understudied and at least 4 ORCHID species occur – Bee, Pyramidal, Common Spotted & Southern Marsh Orchids.

The high biodiversity & biodiversity potential of the whole Nar Valley area is one of the reasons why a large-scale REWILDING project has been funded just downstream at Westacre.

So in closing, wrt. Biodiversity I would therefore propose more extensive HABITAT REGULATIONS ASSESSMENTS over the next couple of years by multiple experts who specialise in the various groups of fauna & flora BEFORE any final decisions are made on this massive solar project, a project which could have serious immediate and long term negative consequences for this area of high and increasing species biodiversity.

THANK YOU.

Dr Mark Holmes (Naturalist & local resident).

Southacre, Norfolk.

\*\*\* COPY OF ORAL SUBMISSION TO HEARING, GIVEN BY ME 06.05.2026 \*\*\*

PLEASE SEE FOLLOWING CLARIFICATION QUESTIONS (BELOW) TO BE ADDRESSED & ANSWERED BY THE APPLICANT – THANK YOU.

1/ Re. Stone Curlews – How will accurate survey work be done for Stone Curlews on a licensed & professional basis (this being a Schedule 1 protected bird) both now & for the suggested 5 year recording period ? (Current Stone Curlew ecological survey reporting – arranged by the applicant – is clearly already incomplete & out of date).

2/ Re. High Biodiversity value of site (an area that is functionally linked to the Breckland SPA) - How will extensive Habitat Regulation Assessments be performed to guarantee that proper & expert surveys are done on ALL groups of fauna & flora ? (Current ecological reports – arranged by the applicant – have more of a scope quality rather than the expected in depth expertise approach for all groups of natural history. For example, if we take insects, one would expect far more survey work on bee, beetle, moth, & butterfly species – to reiterate Breckland supports many very rare species of insect).

3/ As I raised at the early May Hearing, will all future references to “Curlews” differentiate as to whether they are referring to the larger & localised Eurasian Curlew or the much rarer Schedule 1 protected Stone Curlew ?

4/ Can I again ask that this above level and in depth quality of ecological survey work is carried out for an appropriate duration of time before any final decision is made on this industrial scale solar farm project ?

FINALLY can I please confirm that I would like to talk/submit further oral information (as required) at the next hearing scheduled for the w/c 7<sup>th</sup> September 2026.

THANK YOU.

Dr Mark Holmes BSc MBBS MRCGP FLS - resident of Southacre, Norfolk.