

ISH2 – Summary of oral representation made under agenda 3.3 – Biodiversity

Sporle with Palgrave Parish Council represented by [REDACTED] - [REDACTED]

1. Impact of a mowing strategy:

So much of the marketing material put out by solar developers show sheep grazing under the arrays. However, in reality this is by no means possible for all solar projects. The Applicant acknowledges this and says that mowing will be the default position.

Therefore, can it be assumed that the mowing option has been included in the Applicant's BNG calculations?

Even if that is so Sporle PC's concerns are that with the increasing likelihood of seasonal droughts and heatwaves the mowing regimes will become increasingly important to prevent wild fires.

However, these mowing regimes will not provide the benefit to the soil condition and fertility of the now semi-permanent pasture because there would be no longer any manuring taking place as the oLEMP speaks of cut grass being collected. This would not even have the benefit of larger wildlife grazing and manuring as they will have been fenced out.

Another concern is that the mowing regime will mean that areas beneath the arrays will need spraying to prevent growth of potential fire vulnerable vegetation. This will surely not improve the project's BNG credentials.

Much of the site involves sloping fields covered with arrays. It is accepted that bare soil under the arrays is protected from rainfall. However, rainwater concentrated at the lower edge of arrays will provide a means of soil erosion which will be exacerbated by any slope.

It is noted that detail is provided on grass species and possible grazing and mowing regimes in the oLEMP (App/7.11.2). However there does not seem to be any recognition of the dangers of long vegetation and wild fires in times of drought such as experienced this year and increasingly likely in future years.

Table 3-6 in the oOEMP (App/7.8.3) says"
'Vegetation would be managed with machinery.

There may be the opportunity for land beneath the PV panels to be grazed by sheep although the ES assumes that all grassland will be managed by machinery as a default position.'

In light of these concerns, particularly wildfires, Sporle PC would ask that that more detail should be included in the oOEMP and oLEMP of how this will be done.

2. Deer:

Sporle PC have consistently argued for more mitigation in relation to deer and the increased likelihood of accidents on the A1065. We welcome that there has been a revision of the Design Principles, Parameters and Commitments at Deadline 3 in relation to deer fencing along the A1065 to attempt to encourage deer to move away from the road. This is notwithstanding the need to reduce the visual impact by removing some if not all solar arrays along the A1065 as has been previously requested by Castle Acre PC.

However, Sporle PC would have three questions in relating to this revision:

- Has the Applicant sort professional advice from those whose expertise is in the movement of deer through the landscape. For example as to how wide the gap should be between hedge and deer fencing?
- Will the hedge along the A1065 be thick enough and high enough to prevent and deter deer from accessing the road? Will the fencing erected during the construction phase be in place long enough for that to be achieved?
- Is there any way that landowners can be required to manage the deer as part of their responsibilities within the agreements between them and the Applicant?

3. *Overplanting:*

The Applicant's response to Sporle PC's questions at Deadline 2 regarding scheme overplanting included a quote from paragraph 6.11.10 of the Statement of Need (App-042):

'Any optimisation of layout at a detailed design stage would be unlikely to identify any areas of land which would be useful to keep out of the scheme for alternate use, e.g. arable farming. This is because any such areas identified would be likely to be around the edges of field margins and disconnected from any other areas similarly identified and therefore would have little or no agricultural purpose.'

Sporle PC would ask that areas freed up by layout optimisation be used as an opportunity to intentionally create wider and dedicated wildlife corridors through the scheme. Thereby improving the BNG.