

Site 9. Brooke,

Brooke Parish Council

Written response to Hearings

Heritage

Brooke Parish Council wishes to comment on heritage and Ecology weaknesses in statements provided by East Pye Solar.focused on the identified weaknesses in the Site 9 Heritage Statement.

Consultation Comments on Site 9 (Brooke) Heritage Assessment

Comment 1: Reliance on Existing Vegetation Screening

The assessment's conclusion of "no harm" relies heavily on the presence of existing mature trees, hedgerows and vegetation screening around Brooke Conservation Area, Waterfield Cottage, Oldhouse Farmhouse and Littlebeck Farmhouse. The assessment does not explain how these screening features will be secured, managed and maintained throughout the operational life of the solar farm. No assessment is provided of the potential effects of vegetation loss through disease, storm damage, ageing, or future management practices. The applicant should provide a robust long-term landscape management plan and demonstrate that the conclusions of negligible heritage impact remain valid under winter and reduced-screening scenarios.

Comment 2: Lack of Heritage-Led Mitigation

The Heritage Statement explicitly states that the exclusion of certain fields from development was "not specifically heritage-led". While this approach may reduce impacts, it suggests that heritage considerations have not been a primary driver of the final design. Additional justification should be provided to demonstrate that opportunities for heritage-led design optimisation have been fully explored. Consideration should be given to specific mitigation measures aimed at conserving the setting of nearby heritage assets, particularly Brooke & Kirstead Conservation Area.

Comment 3: Insufficient Assessment of Winter Visibility

The assessment acknowledges the existence of occasional and filtered views between Site 9 and nearby heritage assets, particularly during periods when vegetation cover is reduced. However, no detailed assessment of winter or leaf-off visibility has been presented. The absence of seasonal visualisations, photomontages, or a worst-case assessment limits confidence in the conclusion that no harm would arise. Additional evidence should be provided demonstrating the appearance of the scheme from relevant heritage receptors during winter conditions.

Comment 4: Impact on the Rural Setting of Brooke Conservation Area

The Conservation Area Appraisal identifies the rural landscape surrounding Brooke, particularly to the south, as an important component of the Conservation Area's setting. While the Heritage Statement concludes that solar arrays within two fields would not affect appreciation of this landscape, the assessment does not fully explain how the introduction of modern energy infrastructure would preserve the open agricultural character identified as significant within the appraisal. Greater analysis should be provided regarding the contribution of the southern rural backdrop to the significance of the Conservation Area and whether the proposed development would alter that character, even where visibility is limited.

Comment 5: Lack of Assessment of Cumulative Change

The assessment focuses on the effects of Site 9 in isolation and does not clearly address whether the introduction of solar infrastructure, fencing, inverter stations, access tracks and associated infrastructure could contribute to cumulative changes in the rural landscape experienced from heritage assets over time. A cumulative assessment should be provided to demonstrate how the proposal would interact with other existing or proposed developments in the surrounding countryside.

Comment 6: Absence of Monitoring and Review Commitments

The assessment proposes new boundary planting as mitigation but contains no commitment to post-construction monitoring, replacement planting, or review mechanisms should screening prove ineffective. Given that the conclusions of no harm rely substantially on landscape screening, a monitoring programme should be secured through appropriate planning conditions to ensure that mitigation remains effective throughout the operational life of the development.

Summary of Heritage Assets impact:

Whilst the Heritage Statement concludes that the scheme would result in no harm to the significance of designated heritage assets, the assessment relies heavily on existing screening and contains limited heritage-specific mitigation. Further evidence is required regarding seasonal visibility, long-term landscape management, cumulative effects and the protection of the rural setting of Brooke & Kirstead Conservation Area before the conclusion of no harm can be fully substantiated.

Ecology and Biodiversity Summary for East Pye Solar Site 9 (Brooke)

Site 9 is one of the solar development parcels assessed within the Ecology and Biodiversity Environmental Statement. The ecological assessment identifies a number of habitats, designated wildlife sites and protected species that could be affected by construction, operation and decommissioning of the solar farm. The overall conclusion of the chapter is that impacts can generally be reduced through embedded mitigation, habitat retention and biodiversity enhancement measures.

Ecological Receptors Near Site 9

The Environmental Statement identifies several non-statutory wildlife sites close to Site 9, including:

- **Brooke Wood County Wildlife Site (CWS)** approximately 0.1 km west of Site 9.
- **Nunn's Grove CWS** approximately 0.5 km south-west of Site 9.
- **Park Plantation CWS** approximately 0.4 km east of Site 9.
- **Church Road Wood CWS** approximately 0.9 km west of Site 9.
- **Kirstead Hall Wood CWS** approximately 1.2 km north-east of Site 9.
- **Atlas Gravel Working CWS** approximately 1.9 km north of Site 9. [\[bing.com\]](https://www.bing.com)

These woodland sites are particularly important because they provide habitat connectivity, bat foraging habitat and ecological networks in the Brooke landscape.

Main Environmental Impacts Identified

1. Loss and Modification of Arable Habitat

Site 9 currently comprises predominantly arable farmland. Installation of solar panels would alter the character of this habitat and reduce its value for some farmland species during construction. However, the scheme proposes retention of field margins, hedgerows and grassland management beneath panels, which is expected to improve biodiversity relative to intensive agriculture in the longer term.

2. Effects on Breeding Birds

The wider scheme supports breeding populations of several red-listed farmland birds including:

- Skylark
- Linnet
- Yellowhammer

The Environmental Statement recognises open arable fields as important breeding habitat for these species. Construction activities and land-use change may result in

disturbance and habitat loss for breeding birds. Embedded mitigation, habitat retention and management measures are proposed to reduce these effects.

For Site 9, the principal concern would be the loss or alteration of open-field habitat used by farmland birds that depend on large expanses of arable land. [\[bing.com\]](https://www.bing.com)

3. Impacts on Bats

Bats are identified as one of the most sensitive ecological receptors across the scheme area.

Survey work recorded:

- Eleven bat species.
- Barbastelle bats at every survey location.
- High levels of barbastelle activity across the overall project area.

Potential impacts include:

- Disturbance during construction.
- Removal or alteration of commuting corridors.
- Lighting impacts.
- Changes to foraging habitat.

The assessment notes that bats were of **national ecological importance** within the project area.

Barbastelle Bats and the 6 km / Core Sustenance Zone Issue

A particularly important finding is that the East Pye Solar Order Limits fall within the **published Core Sustenance Zones (CSZs) of multiple known barbastelle maternity colonies**. The report states that:

- The Order Limits lie within the published **6 km Core Sustenance Zones of nine known barbastelle maternity colonies**.
- Maternity colonies at **Tyrrells Wood, Little Wood, Brooke Wood, Spring Wood and Saxlingham Grove** are identified as nearby colonies.
- **THE COMBINED CSZS FROM THESE COLONIES COVER THE ENTIRE PROJECT AREA.**

For Site 9 specifically, the proximity of:

- Brooke Wood CWS (0.1 km west),
- Nunn's Grove CWS,
- Church Road Wood CWS,
- Kirstead Hall Wood CWS,

indicates that the site lies within a landscape heavily used by woodland-associated bats. [\[bing.com\]](http://bing.com)

Comment on the 5 km Exclusion Zone

Although the document refers primarily to a **6 km Core Sustainance Zone**, this is more precautionary than the commonly cited **5 km foraging range** often used when assessing impacts on barbastelle maternity colonies.

Because Site 9 lies:

- within the published CSZ network,
- adjacent to known woodland foraging habitat,
- and within a landscape where barbastelles were widely recorded,

it can reasonably be considered to fall within the key feeding landscape of local barbastelle populations.

This means that habitat changes at Site 9 should be considered not merely as local ecological effects, but potentially as impacts on the supporting habitat of nationally important barbastelle populations.

Conservation Status of Barbastelle Bats

The Environmental Statement describes the barbastelle as:

- protected under the Conservation of Habitats and Species Regulations 2017;
- protected under the Wildlife and Countryside Act 1981;
- an **Annex II species** under the Habitats Regulations framework;
- a **Priority Species**;
- a **Norfolk Biodiversity Action Plan species**;
- classified as **Vulnerable in the UK by the IUCN**.

The report further notes that:

- the species is nationally rare;
- East Anglia is a recognised national stronghold;
- Norfolk is especially important for the species.

Significance for Site 9

Given:

- the proximity of known barbastelle roost woodlands,
- the presence of nearby woodland wildlife sites,
- the site's location within overlapping CSZs,

- and the species' vulnerable conservation status,

barbastelle bats represent one of the most important ecological receptors relevant to Site 9. The Environmental Statement ultimately concludes that mitigation measures can avoid significant effects, but the baseline evidence confirms that Site 9 sits within a landscape of high importance for barbastelle bat feeding and commuting activity, which cannot be mitigated as it consists mainly of ancient mature woodland, which is impossible to achieve within the timeframe of the construction period of the project

Ecological Impact Summary

The Ecology and Biodiversity ES confirms that the East Pye Solar Order Limits fall within the Core Sustenance Zones of nine known barbastelle maternity colonies and that barbastelle bats were recorded throughout the survey area. Given that Site 9 lies within the functional feeding landscape of a nationally important and IUCN-Vulnerable species, further justification should be provided demonstrating that the conversion of arable land to solar infrastructure must not adversely affect foraging habitat quality, commuting behaviour, or the integrity of nearby maternity colonies.

While Brooke Parish Council accepts that development within a Core 6 km Sustenance Zone is not in itself an offence, we argue that the legal issue is not presence but adequacy of assessment and protection. We require further assessment by EPS of :

- Review of Appendix 8.6 (Bat Surveys).
- Review of the Protected Species Mitigation Strategy.
- Review of the Habitats Regulations Assessment (if produced).
- Review of Natural England's consultation response.
- Evidence that habitat loss or disturbance would materially affect colony viability or conservation status.

In order to properly assess habitat dependence, colony-level impacts, cumulative effects, landscape connectivity, and conservation status outcomes.