## Introduction

My name is Daniel Foster and I am a local resident to the Whitstone Solar project, an Interested Party (reference: [redacted]) and wish to submit a series of comments.

I am a professional [redacted] with over 20 years postgraduate experience and a full member of the [redacted]. I am also a member of the [redacted]

Throughout my career I have worked on a wide range of development projects, including numerous solar energy schemes. I have experience in the assessment of ecological effects, mitigation and compensation design, and applying relevant planning policy and nature conservation legislation

For several years I was [redacted] for the [redacted], taking the project from its early stages through to examination before moving to a new role. Through this and other comparable projects, I have developed a strong understanding of the ecological issues commonly associated with large solar developments and the approach to assessment and mitigation.

The comments set out below are provided in a personal capacity as an Interested Party and reflect my professional opinion based on the information submitted by the Applicant. I would also welcome the opportunity to attend and speak at any Ecology and Biodiversity Issue Specific Hearings that may be held during the examination.

The main focus of my comments relates to ecological matters, which are my area of professional expertise. The observations below are based on my review of the application documents and my professional experience of ecological assessment for major development projects. For ease of reference, they are broadly grouped into the following categories:

**Ecological matters**

- Breeding birds
- Impacts to Brampton Common Local Wildlife Site
- Assessment conclusions and evidencing of ecological effects
- Inter-relationship of the scheme with Penny Hill Wind Farm

**Non-ecological matters**

- Impacts to green belt

## 1. Breeding birds

### Survey methodology

In the breeding bird survey report (Appendix 6.6), it is stated that a reduced version of the Bird Survey and Assessment Steering Group guidance was followed, which is explained in 6.6.11 as undertaking four survey visits rather than the recommended six. However, the guidance also states:

*'As species vary in their detectability throughout the day, at least one of the six visits should be in the evening (i.e. during the last few hours of the day, and extending beyond sunset for at least one hour) to pick up species not readily recorded by conventional surveys early in the morning.'*

No evening bird survey was undertaken at Whitestone. At 6.6.17 the applicants breeding bird report states that *'The habitats within the BBS Area are unsuitable or suboptimal for many species that are typically more active at dusk'* but does not give further explanation.

One of the species that crepuscular bird surveys are intended to assist in detecting within lowland agricultural landscapes is quail. Quail is an uncommon species that is primarily associated with

lowland agricultural habitats, including arable land; on account of its scarcity quail is listed on Schedule 1 of the Wildlife and Countryside at 1981 (as amended), a Section 41 Species of Principal Importance and is Amber listed species on the Birds of Conservation Concern. Quail is also known to breed in South Yorkshire, and the applicants Biodiversity Chapter at paragraph 6.5.10 states that records of quail were provided in the Desk Study. Quail is a cryptic species and is typically more active in the evening than during the daytime; it is for this reason that crepuscular bird surveys are important in areas where the presence of breeding quail is possible. Crepuscular surveys would have also provided useful information on the usage of the site by other species, especially barn owl.

Although there are records of quail in the local area and suitable habitat is present within the Site, the issue is not necessarily whether quail are present, but whether the survey methodology was sufficient to reasonably establish their presence or likely absence. In the absence of any crepuscular surveys, it is unclear how the Applicant has concluded that breeding quail are unlikely to occur within habitats affected by the proposals.

Questions for the Applicant:

1.1. Given the presence of quail records in the local area and suitable habitats on the Site that will be impacted by the development, why were crepuscular surveys not undertaken?

1.2. Given the limitations of the survey methodology, how has the Applicant concluded that quail does not require specific consideration within the assessment?

**Ground nesting birds: access limitations**

The breeding bird survey methodology faced access challenges in a number of locations. The applicant stated in paragraph 6.5.90 of the Biodiversity Chapter regarding skylark that *'As a precaution, a further 18 territories are included in the total (205 overall) to account for fields with limited access.'*. It is not clear how the applicant has established that number.

Question for the Applicant:

1.3. What guidance, evidence or metric has been used to estimate these further 18 skylark territories?

**Ground nesting birds: assessment and mitigation**

Ground nesting birds are present throughout the Site, with large numbers of skylark and reasonable numbers of lapwing within arable land. The Applicant's own assessment predicts displacement of at least 119 skylark territories and 20 lapwing territories. However, the ES does not clearly explain how the proposed mitigation and compensation measures have been assessed to demonstrate that residual effects associated with this level of displacement would be reduced to a low magnitude and non-significant level. As these species will be adversely affected by the proposals, it is therefore crucial that the impacts are well understood. In my view, the submitted information is inadequate and does not allow for decision makers to full consider the impacts in a transparent manner.

Table 6.3 in the Biodiversity ES chapter identifies that many consultees raised concerns about the impacts to ground nesting birds, however, the Applicant has not identified skylark or breeding bird impacts as a Potential Main Issue for Examination. Impacts to skylark and other ground nesting birds has been a key item for examination in many other Solar NSIP. The Secretary of State decision letters on the recently consented Solar NSIPs Steeple Renewable and Green Hill Solar, both explicitly discuss the impacts to ground nesting birds, and that they have weighed the adverse residual effects to skylark negatively in the planning balance.

The Applicant's Biodiversity ES chapter states that following the implementation of mitigation measures, effects to skylark / ground nesting birds would *'be significantly reduced and be of Low magnitude, Local and Not Significant'*. It is difficult to understand how they have come to this conclusion as there is little substantive evidence to support it. The Applicant has quantified the

baseline skylark resource and identified those territories associated with land proposed for solar infrastructure. However, the assessment does not appear to quantify the likely loss or displacement of territories, the anticipated carrying capacity of retained and compensatory habitat, or the resulting residual population. Consequently, the evidential basis for the conclusion that effects on skylark are not significant is unclear and cannot be independently scrutinised by Interested Parties or the Examining Authority.

The approach taken by other Solar NSIP schemes (for example Steeple Renewables, West Burton, Cottam, Green Hill) provides a transparent assessment by quantifying both baseline and predicted post-development numbers of ground nesting bird following the implementation of mitigation measures. This allows for more robust scrutiny of impacts. A number of comparable Solar NSIP projects have presented substantial mitigation and compensation packages for skylark and other ground-nesting birds. Despite this, residual adverse effects have in some cases remained significant or have attracted substantial examination scrutiny. This raises questions regarding the evidential basis for the Applicant's conclusion that residual effects at Whitestone would be reduced to a non-significant level. In my professional opinion, the information currently presented does not provide a sufficiently robust basis for concluding that residual effects on ground-nesting birds would be reduced to a non-significant level.

Given the above, the Examining Authority should consider whether impacts on skylark and other breeding birds should be expressly identified within the matters to be examined.

Questions for the Applicant:

1.4. Have breeding bird surveys been undertaken in the off-site compensation areas to understand the baseline ground nesting bird populations?

1.5. How has the Applicant demonstrated no significant adverse residual effect if there has been no quantified comparison between baseline populations and post-mitigation carrying capacity?

1.6. Can the Applicant provide me or the Examining Authority with a link to the document and paragraph numbers where the predicted loss of skylark territories, the capacity of compensatory habitat, and the residual skylark population following mitigation have been quantified and used to inform the conclusion of no significant effect within the biodiversity chapter of the ES?

1.7. What mechanism secures the delivery, management, location, extent and long-term effectiveness of the proposed compensation habitat, and how can the Examining Authority conclude that the mitigation is deliverable if those details are not defined?

1.8. To aid stakeholders can the Applicant provide a standalone ground nesting bird mitigation document that clearly presents quantified impacts and shows where mitigation is proposed and what it will comprise?

1.9. The assessment predicts displacement of at least 119 skylark and 20 lapwing territories. How many territories of these species does the Applicant estimate will be supported by the proposed mitigation and compensation measures following construction and operation of the Proposed Development?

**2. Impacts to Brampton Common Local Wildlife Site**

Many stakeholders have voiced concern at the inclusion of Brampton Common LWS in the site, and the extent of the impacts. I share those concerns.

**Baseline survey evidence and limitations**

The Biodiversity ES chapter at paragraph 6.7.9 states:

*'The BBS found that the LWS had one of the lowest skylark densities within the Order Limits (see ES Volume 3, Appendix 6.6: Breeding Bird Survey Report [EN0110020/APP/6.20.1] for further information). It is considered that Brampton Common LWS is not currently important for skylark as the habitats and management are suboptimal, and therefore there is limited opportunity for effects on this feature in the context of the LWS.'*

This statement presents a high degree of certainty regarding the current importance of the LWS for skylark. However, this certainty is difficult to reconcile with the survey limitations identified elsewhere in the application.

Figure 6.6.2- Access Limitations within Breeding Bird Survey Area, shows that the vast majority of the LWS within the Site had significant access limitations with either no access permitted, or access limited to public rights of way. Given these limitations, it is difficult to understand how the Applicant can conclude that the LWS is not currently important for ground nesting birds.

The issue is not necessarily whether low skylark densities were recorded in accessible areas, but whether the survey methodology and level of site access were sufficient to support a robust conclusion regarding the value of the LWS as a whole. Further clarification is therefore required regarding the confidence that can be placed in the survey results and the conclusions drawn from them.

**Mitigation and compensation strategy**

Notwithstanding the uncertainty regarding the baseline evidence of the LWS, the Applicant does not make a compelling case for the inclusion of a significant proportion of the LWS within the development area.

Paragraph 6.7.117 of the Biodiversity Chapter states:

'*It is recognised that skylark territories would be temporarily displaced from the LWS at construction, but that it is assumed that this can be offset with offsite compensation areas, and sensitive management of land as part of the enhancement proposals within the LWS and the population maintained in the medium to long-term during operation. Further information can be found in the oLEMP [EN0110020/APP/5.13]'*

The use of the word 'assumed' is concerning. The assessment appears to rely upon an assumption that displacement effects can be offset, rather than presenting clear evidence that sufficient and appropriately designed compensation habitat has been identified, secured and demonstrated to be effective. Given that the predicted outcomes are dependent upon the successful delivery of compensation and enhancement measures, greater certainty should be provided regarding the location, extent, management and expected effectiveness of those measures.

The application documents appear inconsistent regarding the duration for which management of Brampton Common LWS would be secured. The Biodiversity Chapter states at 6.7.121 that a LWS Management Plan would be implemented "for the duration of the Proposed Development", however Table 6.12 in the Biodiversity chapter states 'at least 30 years'. If habitat management is required to maintain the ecological interest of the LWS, what assurance is there that the claimed benefits would persist beyond the period for which management is secured?

**Lack of clarity regarding green infrastructure and habitat provision**

Paragraph 6.7.8 of the Biodiversity Chapter states:

*'Of the total area of the LWS (145 ha), approximately 81ha is within Order Limits; of this, 36ha is proposed for solar, 8ha within the Cable Corridor and 37ha is allocated for green infrastructure.'*

However, it is difficult to identify within the Outline Landscape and Ecological Management Plan (oLEMP) where the claimed 37ha of green infrastructure is located within the LWS and how this land contributes to mitigation for skylark and other ground-nesting birds.

The information relevant to LWS impacts, mitigation, compensation and enhancement appears to be dispersed across multiple documents and figures. Based on the information currently presented, I have identified only two fields within the LWS that are proposed for habitat creation and which could reasonably be expected to provide suitable habitat for ground-nesting birds. Together these areas appear to total approximately 19ha. Whilst smaller habitat creation areas are also proposed, these would not provide suitable nesting habitat for skylark.

As a result, it is difficult to understand how the Applicant has arrived at its conclusions regarding the adequacy of mitigation and compensation measures.

**Claimed beneficial effect on the LWS**

The Biodiversity Chapter in paragraph 6.7.122 states:

*'Once the LWS habitat enhancements are established and the habitats are functional as species-rich hedgerows and grasslands suitable for breeding skylark, there will be a medium magnitude, local Significant Beneficial effect on the LWS in the medium to long-term, secured through the management and monitoring plan for the Proposed Development and the BNG commitments.'*

Given the uncertainty surrounding the baseline survey evidence and the lack of clear information demonstrating the location, extent and likely effectiveness of the proposed mitigation and compensation measures, it is difficult to understand how the Applicant has reached the conclusion that the development would result in a significant beneficial effect on the LWS.

In summary, I am concerned that the Applicant has not provided sufficient evidence to demonstrate that significant adverse effects on Brampton Common LWS would be avoided, particularly in relation to the skylark interest for which the site is designated. Given the limitations of the baseline surveys and the lack of a clear and transparent mitigation and compensation strategy, there remains considerable uncertainty regarding the likely effects of the Proposed Development on the LWS.

<u>Questions for the Applicant:</u>

2.1. The Applicant concludes that Brampton Common LWS is not currently important for skylark. Given the access constraints identified in Figure 6.6.2, can the Applicant provide:
- Detailed information on how the LWS was surveyed, including survey dates, viewpoints and coverage of inaccessible land;
- An explanation of how survey limitations have been reflected in the assessment; and
- Evidence supporting the conclusion that habitat condition and management within the LWS are suboptimal for skylark and other ground-nesting birds?

2.2. Can the Applicant provide a standalone document with annotated figures that clearly sets out:
- The extent of the LWS affected by the development;
- The location and area of all habitat losses within the LWS;
- The location and area of all mitigation, compensation and enhancement measures;
- The specific measures intended to support skylark and other ground-nesting birds.

2.3 What evidence supports the conclusion that the Proposed Development will result in a significant beneficial effect on Brampton Common LWS?

2.4 Can the Applicant explain why the current scheme design requires approximately 81ha of Brampton Common LWS to be included within the Order Limits, and what consideration has been

given to avoiding or reducing impacts on the LWS through alternative layouts or the removal of solar infrastructure from parts of the designated site?

2.5 Given that the Proposed Development requires the provision of habitat enhancement and compensation measures for ground-nesting birds, can the Applicant explain why areas of Brampton Common LWS proposed for solar development have not instead been incorporated into the mitigation strategy, thereby reducing impacts on the designated site whilst contributing towards the delivery of ecological enhancement objectives?

2.6. Given that the Proposed Development seeks consent for 60 years, why are management and monitoring commitments for Brampton Common LWS potentially secured for 30 years, and how can the Applicant be confident that the claimed ecological benefits will be maintained throughout the lifetime of the scheme?

I am not currently persuaded that the Applicant has demonstrated either that significant adverse effects on Brampton Common LWS can be avoided or whether sufficient consideration has been given to opportunities to reduce impacts on the LWS through scheme redesign. Given the acknowledged need for habitat creation and management to support skylark and other ground-nesting birds across the Proposed Development, there appears to be an opportunity to retain larger areas of the LWS outside the development footprint and manage them as part of the mitigation and enhancement strategy. The Applicant should therefore explain what consideration has been given to avoiding or reducing impacts on the LWS through alternative layouts and a greater emphasis on habitat retention and enhancement within the designated site.

## 3. Assessment conclusions and evidencing of ecological effects

The Biodiversity ES Chapter contains some inconsistencies and areas where the assessment findings are unclear. In my opinion, some of the conclusions are insufficiently evidenced or do not accurately reflect the information presented elsewhere within the chapter. Collectively, these issues may affect how ecological effects are understood and weighed by the Examining Authority. It is therefore important that the assessment is presented clearly, consistently and supported by evidence for each ecological receptor.

Given that the Applicant's ES methodology (which is based on CIEEM guidance) at paragraphs 6.4.42 and 6.4.47 states that significance should be determined by reference to changes in habitat or species conservation status within a given geographical area, it is important that the evidence supporting assessment conclusions is clearly presented. In particular, where effects are reported as beneficial and significant, the assessment should clearly explain how the proposed measures would improve the conservation status of the relevant ecological feature at the stated geographical scale, and identify the evidence relied upon in reaching that conclusion. However, throughout the Biodiversity ES Chapter there are instances where significant beneficial effects are identified, but where it is unclear how the Applicant has concluded that conservation status would be improved, or what evidence has been relied upon to support that conclusion.

I will use the example of bats, breeding skylark and wet woodland below to illustrate these concerns.

**Bats**

The Biodiversity Chapter at 6.7.132 states that

*'Creation of new grassland, hedgerow and woodland habitats, and enhancement proposals to existing hedgerow habitats are proposed in the oLEMP [EN0110020/APP/5.13]. The maturing of newly created or enhanced connecting habitats during the operation and maintenance phase such as created and enhanced hedgerows, and small woodland blocks would lead to strengthening of*

*foraging and commuting habitat for bats, and as trees mature, there is the potential that in time they would exhibit potential roost features (e.g. splits and holes) that would benefit roosting bats. As referenced in Section 6.7 and detailed in the oLEMP [EN0110020/APP/5.13], the addition of 75 bat boxes on some retained trees with negligible bat roost potential within the Site will provide roosting opportunities for bats beyond that currently available.'*

And continues in 6.7.133 to summarise the residual effect to bats

*'These effects of habitat creation would be Beneficial, long term, on a district scale, moderate magnitude of scale, at the district level and likely Significant.'*

Within the bat sections of the ES Chapter, the amounts of optimal bat habitat being created are not stated or quantified. This would have been helpful for the reader to have reassurance that the claimed significant benefit is accurate. The amounts of new habitat created are quantified in the BNG Report, including optimal bat habitats woodland (1ha) and scrub (1ha). There are increased amounts of neutral grassland being created (63ha) and 23km of new hedgerow creation and further amounts of retained and enhanced hedgerows. There is research that shows bats avoid foraging within and around solar arrays[1], so those habitats adjacent and below arrays (typically modified grassland) should not be considered as suitable for bats.

Whilst the proposed habitat creation is likely to provide beneficial opportunities for foraging and commuting bats within and around the Site, it is unclear from the ES how these measures would result in benefits to bat conservation status of district level extent. In my opinion the benefit is overstated.

**Breeding skylark**

The residual effects on breeding skylark are presented as "Low/Neutral" and "Low", with both effects assessed as not significant. I have presented evidence elsewhere to show how I believe this assessment is not currently evidenced.

Unless an effective mitigation and compensation package were provided which compensated for all, or the vast majority of displaced territories (which I have suggested may not currently be the case), the assessment would be expected to acknowledge some level of adverse residual effect arising from the permanent change in land use and loss of existing nesting and foraging habitat. The conclusion that effects would be Low/Neutral appears to understate the adverse nature of the impact. Further, the assessment does not clearly explain how a neutral outcome has been reached given that breeding skylark habitat would be permanently affected by the Proposed Development.

**Priority habitat – wet woodland**

The Biodiversity ES concludes that effects on wet woodland during operation would be 'Local, Moderate Beneficial and Significant'.

However, this conclusion does not appear to be supported by the information presented within the Outline Landscape and Ecological Management Plan (oLEMP). The oLEMP acknowledges that a permanent loss of wet woodland, estimated at approximately 0.03 ha, would occur and confirms that some localised loss and disturbance is unavoidable.

Whilst enhancement measures are proposed, the oLEMP states that these measures are still being explored, could include targeted planting and invasive species control, and remain subject to further

[1] Tinsley, E.; Froideveaux, J.S.P; ZsebőK, S.; Szabadi, K.L.; and Jones, G. (2023). Renewable energies and biodiversity: Impact of ground- mounted solar photovoltaic sites on bat activity. *Journal of Applied Ecology* 60, 1752–1762.

feasibility assessment, consultation and design development. Potential wet woodland creation opportunities are similarly described as being under consideration rather than committed to.

Given the limited extent of wet woodland affected, the modest enhancement measures currently described, and the uncertainty surrounding their delivery, it is unclear how the Applicant has concluded that the outcome would result in a ‘Local, Moderate Beneficial and Significant’ effect.

Further, the Applicant's methodology states that significant effects arise where conservation status would be altered. The assessment does not clearly explain how the proposed measures would improve the conservation status of wet woodland at Local level, nor identify the evidence relied upon to support this conclusion. In my view, based on the information currently available, a Neutral or Low Adverse effect would be more accurate, unless further evidence is provided demonstrating that the proposed enhancement measures will deliver a measurable improvement in the conservation status of the wet woodland resource.

Question for the Applicant:

3.1. Given the examples identified above, which indicate that the basis for certain assessment conclusions is either unclear or not fully evidenced within the ES, can the Applicant identify the evidence relied upon in determining the reported magnitude, significance and geographical scale of effects, and explain how that evidence supports the stated assessment conclusion for each relevant receptor? In particular, where Significant Beneficial effects are reported, can the Applicant explain how the evidence demonstrates an improvement in conservation status at the stated geographical scale, and where Neutral or Low Adverse effects are reported, can the Applicant explain how the evidence demonstrates that ecological losses or impacts would not result in a greater level of residual effect?

If the Examining Authority considers the examples above indicative of a wider issue, I respectfully request that this review is applied more broadly across the Biodiversity ES Chapter.

**4. Summary of Impact Assessment Table (Table 6.13)**

The Summary of Impact Assessment (Table 6.13) does not consistently identify residual effects (i.e. adverse, negligible / neutral or beneficial) which makes it challenging for the reader, especially non-ecologists, to understand.

The table identifies several operational effects as ‘Moderate – Beneficial’ and in some instances ‘Neutral’ or ‘Negligible’. However, within the ‘Nature of the Effect’ column many of the construction effects are described only as ‘Negligible’, ‘Very Low’ or ‘Low’, without explicitly stating whether these effects are adverse, neutral or beneficial.

For example, in the ‘Description of the Effect’ column, habitat loss, disturbance, pollution, lighting disturbance and fencing displacement etc are understood by ecologists to be adverse effects on the relevant feature. However, this must be inferred from the description rather than being clearly stated within the summary table itself, because in the ‘Nature of the Effect’ column the outcome is stated as ‘Low’ or ‘Very Low’; I can assume that this is ‘Low-adverse’, but it is unhelpful that this is not explicitly stated. Compare this to beneficial effects, which are explicitly stated as for example, ‘Moderate-Beneficial’.

Questions for the Applicant

4.1 Can the Applicant explain why beneficial effects are explicitly identified within the table, whereas adverse effects are generally not, and confirm whether the residual effects presented as "Negligible", "Very Low" and "Low" are intended to represent adverse, neutral or beneficial effects in each case?

4.2 Can the Applicant provide a revised summary table which explicitly identifies the direction of each residual effect (adverse, neutral or beneficial), rather than requiring effect direction to be inferred from the accompanying text?

## 5. Interaction of the Scheme with Penny Hill Wind Farm

Whilst the turbines of Penny Hill Wind Farm (PHWF) are not located within the Order Limits boundaries, the site encloses all the turbines.

The Scoping Report at 3.2.12 notes the presence of PHWF and that appropriate buffers will be applied and that *'Further consideration of this development regarding siting and cumulative impacts will be presented in the ES*.' I have not seen reference to, or assessment of, cumulative impacts between the project and PHWF in Chapter 6: Biodiversity or Chapter 17: Cumulative Effects Assessment of the ES. Within Chapter 17, Paragraph 17.1.4 states that:

'*Inter-project effects refer to the impacts that arise from other existing and / or approved development within reasonable proximity of the Proposed Development, which individually might not be Significant, but when considered together could create a Significant cumulative effect on a shared receptor. The cumulative effects refer to the impacts, whether beneficial or adverse, direct or indirect, and both long-term and short-term that result from a variety of activities occurring within a specific area or region*.'

The omission of PHWF from the cumulative effects assessment is difficult to understand when considering the methodology set out within the chapter itself, as demonstrated above. Of particular note is the first sentence of para 17.4.1, regarding a Significant cumulative effect on a shared receptor. PHWF appears to meet these criteria. It is an existing/approved development located in immediate proximity to the Proposed Development and shares key ecological receptors, notably bats and birds. The Proposed Development would convert extensive areas of arable land to grassland, including species-rich grassland and other biodiversity enhancements specifically intended to increase ecological value and attract wildlife. The wind farm, meanwhile, presents a recognised collision risk pathway for bats and birds.

A plausible cumulative effects pathway exists: habitat enhancement associated with the solar farm may increase the abundance, distribution and activity of bats and birds within the wind farm landscape, thereby increasing exposure to turbine collision risk. This is a cumulative effect arising from the interaction of the two developments on the same receptors.

The definition in Chapter 17 states that cumulative effects may be beneficial or adverse, direct or indirect, and may arise from a variety of activities occurring within a specific area. The interaction between habitat creation associated with the Proposed Development and collision risk associated with the adjacent wind farm is a clear example of an inter-project effect that should have been assessed.

Given the proximity of the developments, the shared ecological receptors, and the plausible mechanism by which one development may influence receptor exposure to impacts from the other, it is unclear why PHWF was excluded from the cumulative effects assessment. The omission appears inconsistent with the assessment methodology set out in the ES. Therefore, it is unclear if potentially significant cumulative effects on bats and birds have been identified and assessed.

The omission is also significant because the proposed habitat enhancement measures have the potential to alter the environmental conditions upon which PHWF assessment was based. It was assessed against an arable baseline, with turbines located to avoid habitats likely to support elevated levels of bat activity. The proposed conversion of arable land to species-rich grassland and other biodiversity enhancement habitats would fundamentally change the surrounding landscape, increasing its attractiveness to bats and birds.

Consequently, the abundance, distribution and behaviour of these receptors within the wind farm landscape may differ materially from those assumed in the wind farm's submitted EIA and associated collision risk assessments. Whilst this does not alter the status of the wind farm consent, it raises an important question as to whether the level of ecological effect previously predicted remains accurate once the habitat enhancement proposals are implemented.

The cumulative assessment should therefore consider not only the effects of the wind farm and solar farm acting together on shared receptors, but also whether the Proposed Development has the potential to alter receptor behaviour in a way that changes exposure to impacts associated with the adjacent wind farm. This represents a clear indirect inter-project effect and falls squarely within the ES's own definition of cumulative effects.

Questions for the Applicant

1) The Applicant states that the Proposed Development will increase biodiversity value through the creation of species-rich grassland and other habitat enhancements intended to attract and support wildlife. Given the immediate proximity of PHWF, where is the assessment demonstrating that increased use of the site by bats and birds will not result in increased exposure to turbine collision risk, and if no such assessment exists, how has the Applicant concluded that cumulative effects on these receptors are not significant?
2) On what basis does the Applicant consider that PHWF does not meet the Chapter 17 definition of an existing development capable of generating inter-project effects on shared ecological receptors?
3) Given the proposed habitat creation and biodiversity enhancement measures, is the Examining Authority satisfied that cumulative effects on bats and birds have been identified and assessed?
4) If the proposed habitat creation and enhancement measures are successful in increasing the abundance and activity of bats and birds, as intended by the biodiversity objectives of the Proposed Development, what evidence demonstrates that this increase in receptor presence would not affect the collision risk assumptions underpinning the adjacent Penny Hill Wind Farm assessment?

**7. Non-ecological matters**

Whilst this section of my comments is not an area of professional expertise for me, I provide comment here as a local resident of Wickersley. Within Wickersley we currently have a several large projects around the south and southwest of the village which will provide much needed new housing and renewable energy. Although they are being developed on green belt, I broadly support the schemes as there is an identified need and there will be some remaining areas of green belt. I am concerned however, that Whitestone will not only erode the green belt further around Wickersley but also around other villages and urban edges.

It appears that Whitestone will be located almost exclusively on green belt. I note that the Applicant is making the case that much of this is grey belt. The Applicant's grey belt case appears to place significant weight on the presence of existing infrastructure. However, the existence of motorways, pylons, substations and wind turbines does not necessarily mean that land ceases to perform Green Belt functions.

While parts of the Site may have a reduced Green Belt function, the wider area continues to provide openness and maintain separation between settlements across this part of South Yorkshire. The remaining undeveloped land appears to play an important role in preventing encroachment and preserving strategic gaps between settlements and infrastructure corridors. The Green Belt here may be fragmented, but in my view it still serves a meaningful purpose

If the Examining Authority concludes that the Site does not comprise grey belt land, or that only parts of the Site meet the grey belt definition, then the Proposed Development should be assessed as inappropriate development in the Green Belt. In that situation the Applicant must demonstrate Very Special Circumstances that outweigh the harm.

While the renewable energy benefits of the scheme attract substantial weight, the existence of a national need for renewable energy infrastructure should not, in my view, negate the need for scrutiny

of Green Belt impacts at this specific location. The examination should therefore carefully consider whether the claimed Very Special Circumstances are genuinely exceptional, rather than relying solely on the general need for renewable energy infrastructure.

Based on the information currently submitted, I am not persuaded that biodiversity benefits would attract positive weight in the planning balance. In my view, further evidence is required before such a conclusion can be reached. When considered alongside potential adverse effects on biodiversity, local communities, landscape character and heritage assets, it is not yet clear to me that the Applicant has demonstrated Very Special Circumstances sufficient to outweigh the harm arising from Green Belt development.