



Cleve Hill Solar Park

DCO Application Reference EN010085

Summary of Written Representation from **Kent Wildlife Trust**

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Consideration of Alternatives (Paragraphs 2 – 6)

We question some of the statements made regarding the application site, and highlight a recent NSIP application for a similar scheme. We also question whether the design and engineering choices for the development have unduly limited the examination of alternatives, rather than this being led by the overall objectives or characteristics of the application.

Mitigation for Brent geese (Paragraphs 7 and 8)

We point out an over-simplification of the calculation of carrying capacity of the mitigation area that does not take into account management constraints and request this is corrected.

Lapwing and golden plover Paragraphs 9 – 13

The assumptions made regarding the ability of the mitigation area to provide for lapwing and golden plover are not supported by the studies we have found, calling into question the mitigation for lapwing. In the absence of better evidence, more mitigation for lapwing is required.

Outline Landscape and Biodiversity Management Plan (APP-203) Paragraphs 14 – 17

We state the importance of the LBMP and request further detail on grazing management and water-level control, and further consideration of the deliverability of aspects of the LBMP.

Marsh harrier (Paragraph 18)

We raise an issue of uncertainty regarding the functionality of marsh harrier mitigation. We note that this issue has been picked up in ExQ1.1.11.

Managed Realignment (Paragraph 19 and 20)

With regard to climate change, we request that the context within which the Application is considered includes the Environment Agency's plans for the site, and request that these plans are not constrained by the Solar Park.

Acquisition of Rights (Paragraph 21)

While not forming one of our grounds for objection, owing to the early stages of discussion we update the Inspector on the current situation.