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Application by Sunnica Ltd for an Order Granting Development Consent for the Sunnica Energy Farm.

The Examining Authority's written questions and requests for information (ExQ1) Issued on 4 October 2022: responses from Suffolk Wildlife Trust.

Q 1.0.18: The Suffolk Wildlife Trust Relevant Representation [RR-1142] states that "Additionally, we are concerned that there has been a lack of consideration of cumulative impacts from the proposal with other plans and projects, including local smaller solar farm developments". Please provide details of the specific developments that you consider are absent from the cumulative effects assessment.

Answer: There are two issues to consider here.

Firstly, the effectiveness of the cumulative assessment methodology:

We question the underlying assumption that appears to have been applied in the assessment of potential for significant cumulative effect that if the individual project or scheme level effects have been assessed to be insignificant or adequately mitigated, then there is no potential for in combination effects to be significant.

By way of illustration, if the theoretical threshold for a significant effect is 0.5 (the units don't matter) and 6 individual projects on their own each have an insignificant effect of 0.1, the overall effect (0.6) will be significant.

Therefore, we request further clarification from the Applicant on how they have established that there will be no significant cumulative effects from the Scheme in combination with other developments.

Section 8.12.4 of EN010106 states "The schemes in Table 8-14 were given particular consideration owing to their proximity to the Scheme, application status and potential for cumulative effects, due to similar impacts on important ecological receptors." In the table it reports, for each development, that "No – the Applicant for the 'other development' has provided sufficient mitigation on their site and no significant impacts have been reported." It is not clear whether this approach has considered the potential for displacement of stone-curlew from the Scheme and the

reliance on mitigation areas to result in cumulative effects on stone-curlew in any mitigation areas or development footprints of the other developments.

Section 8.13.5 states that "No plans or projects identified in Appendix 5A of this Environmental Statement [EN010106/APP/6.2] are considered in combination to impact important ecological features identified in this assessment and considered in Section 8.9. Therefore, the main potential for ecological impacts during construction, operation and decommissioning of the Scheme is considered within the Order limits itself. Other schemes are not likely to contribute to the effects on protected species identified in this chapter and therefore the effects are not significant." This does not appear to consider effects on stone-curlew within 1.5km of the Order limits or of the other developments assessed. 1.5km is the distance within which it is known that nesting density declines around development, and therefore the potential for cumulative impacts on stone curlew within 1.5km of the scheme and other developments should be assessed.

Secondly the Local authorities' Joint Local Impact Report states:

"8.68 The Councils are aware of planning applications in the immediate area of the development that should be considered in-combination with this application because of the potential for effects on Stone Curlew."

The LIR subsequently lists these planning applications and site allocations (8.69 to 8.71). It appears that not all of these allocations and applications have been assessed for cumulative impacts.

Q 1.2.5 Do you consider the proposed offsetting measures to be appropriate, adequate and realistic, given that (presumably) stone curlew cannot be excluded from operational areas? How confident are you that stone curlew numbers can be retained, including of successfully breeding pairs.

Answer: As currently proposed and based on the available evidence from the results of survey work to date, we do not consider the offsetting measures to be adequate and realistic to retain stone curlew numbers, including breeding pairs. We do however consider the kinds of measures proposed – creation of semi-natural habitat and stone-curlew plots – to be appropriate in principle.

While stone-curlew will not be physically excluded from the operational areas, we consider they will be effectively excluded from successfully nesting within these areas as they will not provide the open habitat free from human disturbance that stone-curlews need for nesting. Other likely effects that would decrease the chances of stone-curlews successfully nesting in operational areas include increased predation due to the relatively short sight lines nesting birds would be afforded in these areas. A precautionary approach should be taken that assumes stone-curlew nesting success within operational areas will be reduced to zero and that offsetting habitat will be required for these areas. That is not to say that these areas could not still be used by stone-curlews for foraging, and any measures that can be taken to optimise their condition to provide foraging habitat should be encouraged.

We are concerned that disturbance sources close to the offsetting areas such as roads, houses, public footpaths and the solar farm itself may reduce the suitability of the sites for stone-curlews. Further consideration of these effects to inform the location and design of appropriate offsetting areas (semi-natural habitat and nesting plots) is required to provide confidence that these measures will be sufficient to retain current numbers of stone-curlews, including nesting pairs.

There is also not enough information on how the sites will be created and managed for us to be confident that they will deliver habitat suitable for stone-curlews. The following excerpt from the Joint Local Impact Report provides an illustrative example:

> *Stone Curlew Plots*
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> *8.184 The timing of the creation of grassland habitats and Stone Curlew plots in ECO1, ECO2 and ECO3 is not clearly set out. It is unclear how the grassland will be created alongside the Stone 7 UK Habitats definition of Modified Grassland – vegetation dominated by a few fast growing grasses on fertile, neutral soils. It is frequently characterised by an abundance of rye grass and white clover. SUNNICA JOINT LOCAL IMPACT REPORT 103 Curlew bare ground plots, and whether it will be sown before or after the creation of the Stone Curlew plots. If after, then this will result in disturbance during the Stone Curlew nesting season and potentially render the plots unsuitable for that year. It is also not clear how the translocation of acid grassland turfs will be implemented alongside the management of the area for Stone Curlew.*

Surveys for nesting stone-curlew across the scheme area are incomplete, so that we cannot yet say with certainty how many nesting pairs of stone-curlew will be affected by the scheme. Filling this evidence gap is vital to establishing the adequacy of proposed offsetting measures. Additional surveys are required to establish with greater confidence the number of stone curlew nesting territories that will be affected by the scheme proposals. A precautionary approach should be taken to avoiding impacts where there is low confidence in the adequacy of offsetting.

Q 1.2.6 Do you consider the Applicant's proposals for the monitoring of stone curlew plots, and the measures proposed to monitor them (annually for five years following start of operation and then bi-annually until year ten of operation) to be adequate?

Answer: We agree with the Councils' recommendation in their Joint Local Impact Report that monitoring of stone-curlew plots should be carried out annually for the lifetime of the development and should follow RSPB guidance on stone-curlew monitoring methodology. If there are any ongoing operations being carried out in offsetting areas during the breeding season that may put nests at risk (for example, plot management/ grass cutting) beyond the five-year period then monitoring would need to continue for as long as these operations continued. To reduce the frequency of, or cease, monitoring it would need to be demonstrated that the offsetting areas will

remain in suitable condition and have consistently had the target number of stone-curlews nesting annually. A five-year limit to annual monitoring is, otherwise, arbitrary.

Q 1.2.12 Grassland re-establishment ref [APP-101] Do you consider the Applicant's proposal to secure locally harvested seed to be appropriate and achievable?

Answer: At this stage the applicant has not yet demonstrated that securing locally harvested seed is achievable. This will require an assessment of the volume of seed required and the volume obtainable from appropriate local sources.

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