

**Mallard Pass Solar Farm. Closing Summary Statement by Dr Geoffrey Radley MCIEEM
(Retired) OBE, Interested Party no. 20036053**

I am a retired nature conservation professional. I spent nearly twenty years working on agri-environment schemes. I led the team that developed the English Environmental Stewardship Scheme and was awarded an OBE for services to Agri-environment in 2005.

Throughout the examination process I have tried to point out the areas where I felt the proposed environmental management measures were incorrect or incomplete and to suggest how they might be improved.

These areas, which I covered in my pre-examination statement and in my deadline 2 submissions (REP2 – 207 and REP2 – 208) were as follows:

1. The need to avoid the risk of damage to the species-rich grasslands of some road verges within and around the Order Limits, especially those included in the Ryhall Pastures and Little Warren Verges SSSI.
2. The need to ensure that the proposed skylark plots were correctly positioned
3. The need to supplement these plots with additional management measures to provide food for adult skylarks in winter and for their chicks in spring/summer.
4. The importance of the Order Area for wintering birds and the need to provide mitigation for the loss of their arable field feeding areas.
5. A range of concerns about the management proposed for the grassland areas to be created and suggestions for addressing these concerns.
6. The need to adopt a precautionary approach to the risk of increased flooding in Greatford by providing additional flood storage capacity in the West Glen river corridor.

In the course of the examination process, the Applicants have at least partially addressed some these areas of concern, but have not addressed others. From the latest available version of the Outline Landscape and Environmental Management Plan (Revision 5, Document REP7 – 021) and the Outline Construction Traffic Management Plan (Revision 6, Document REP7 -024) the current position appears to be as follows:

1. Damage to species-rich road verges

The Applicants have given a commitment to route heavy goods vehicles away from routes containing the most species-rich road verges, and have committed to other measures to limit the impact of smaller vehicles. In the latest version of the Outline Construction Traffic Management Plan they have committed to monitoring the impact of construction worker traffic using Holywell Road on the Ryhall Pastures and Little Warren Verges SSSI and, if damage is occurring, to liaising with RCC to agree whether additional signage or road measures are required. Whilst a residual impact is still possible these commitments should go some way towards safeguarding the species-rich road verges of the SSSI. It is however essential that the applicants be required to monitor verge erosion, especially during the construction phase, and to take further remedial measures if necessary.

2. Siting of skylark plots

The latest version of the Outline Landscape and Environmental Management Plan does include guidelines for ensuring that these plots are appropriately sited.

3. The need to supplement Skylark plots with additional management measures

Despite the evidence I presented in my Deadline 2 submissions, the Applicants have not accepted the need to manage the retained arable areas to provide winter seed food for adult skylarks or spring/summer insect food for their chicks. The latest version of the Outline Landscape and Environmental Management Plan mentions that the created calcareous grasslands will provide some additional nesting and feeding areas for skylarks, but the Applicants have not presented any evidence to indicate that these resources will be sufficient to maintain skylark populations. The distribution of the proposed calcareous grasslands also means that they are some distance from most of the fields where the skylark plots will be located, so there must be doubt about whether birds breeding in these fields will even be able to access any grassland feeding areas. The success or otherwise of the mitigation measures in maintaining skylark populations in the Order Area is another key area where a commitment to ongoing monitoring, and to further remedial measures if needed, is required.

4. The importance of the Order Area for wintering birds and the need to provide mitigation for them

The latest version of the Outline Landscape and Environmental Management Plan makes no mention of ground feeding wintering farmland birds, despite the fact that the baseline survey identified substantial numbers of birds of several species using arable fields in the Order Area. Consequently, there is no mention of any measures to mitigate the impact that the development is likely to have on these birds. The baseline environmental statement claimed that the numbers of wintering birds were only of local significance. I have disputed this, but even if the applicant's view is accepted, I still maintain that some mitigation measures should be put in place. The need for such measures is increased by the Applicant's finding that there are four other proposed solar arrays in the area (see document REP9 – 025, Consideration of Additional Long List Developments - Update). This raises the prospect that these developments could, in combination, have a significant effect on wintering populations of ground-feeding birds and so strengthens the case for requiring mitigation measures.

5. Management proposed for the grassland areas to be created

Section 4.2.27 of the latest version of the Outline Landscape and Environmental Management Plan still states that Fields 1 and 3, where it is proposed to establish wildflower grassland with calcareous species, will be cut every two years on rotation in late summer. This is despite myself and other Interested Parties pointing out that this cutting regime is completely inadequate if the aim is to maintain a diverse sward. On productive ex-arable soils, which typically have high levels of phosphate, newly

established grass swards need to be cut much more frequently to prevent a small number of fast-growing, competitive plants outcompeting and eliminating the rest of the sown species.

Section 4.2.35 still states that, if the area under the panels cannot be grazed, it will be cut twice a year, with one of the cuts taken in April/May. Whilst I understand the argument for cutting at that time, it would present a grave risk to any nesting birds or other wildlife. It would also directly conflict the commitment given in section 5.1.15 that 'Vegetation management will be undertaken at an appropriate time of year so as to avoid the nesting bird season....'.

6. Management of the West Glen River Corridor

In section 4.2.14 of the latest version of the Outline Landscape and Environmental Management Plan, the Applicants have committed to providing 'new wet woodland/carr planting along with riparian grassland and a number of shallow scrapes'. In section 4.2.13. they have also made a very vague proposal to 'explore the opportunities for synergies with Anglian Water aspirations for the ecological enhancements of the river corridor'.

I would first like to point out that it is the Environment Agency that has these aspirations, not Anglian Water. More seriously, I am concerned that the Applicants have resisted my suggestion that they jointly explore the possibility of creating a combined biodiversity enhancement and flood storage scheme. Such a scheme would ensure that the work done in the West Glen River Corridor was properly coordinated and would enable a precautionary approach to be taken to any risk of increased flooding in Greatford as a result of the Mallard Pass development.

In their verbal submission on 26th September the Applicants stated that they were 'leaving the way clear for the Environment Agency'. This is unsatisfactory as the Environment Agency have given no timescale for undertaking any catchment management works in the area and do not currently have the funding for these works.

A combined approach would also seem to provide a way for the Applicants to deliver the 10% net gain in each of the three areas (habitat, hedgerow and river) which Natural England have pointed out will be required when Biodiversity Net Gain becomes mandatory (REP9-019 Statement of Common Ground with Natural England Ref NE025). The Applicants would not, as Natural England have pointed out, be able to take account of any Biodiversity Net Gain that would result from an independent Environment Agency scheme as currently proposed.

In summary I still have significant concerns that the environmental management proposed in the latest version of the Outline Landscape and Environmental Management Plan will be deficient in a number of ways. These concerns could be largely addressed if the following were made requirements of the consent for the Mallard Pass Development:

1. A requirement to provide spring/summer insect food within the retained arable fields where the skylark plots are to be sited, using established agri-environmental techniques.
2. A requirement to also use established agri-environmental techniques to provide winter seed food for skylarks as well as for other ground-feeding wintering farmland birds within the retained arable fields. Together with the areas providing insect food, these need to occupy at least 10 % of the productive area, as outlined in my Deadline 2 submissions.
3. A requirement to cut the newly established areas of wildflower grassland with calcareous species sufficiently frequently to allow the establishment of the full range of sown species. Note that this will require the removal of all cut vegetation.
4. Rather than grazing the grassland under the panels with sheep being an option, this should be a requirement. This would avoid the problems likely to be caused by cutting this grassland at inappropriate times of the year and would be much more sustainable. The sheep grazing should be required to be at the low stocking levels specified in section 4.2.34 of the latest version of the Outline Landscape and Environmental Management Plan in order to avoid the risk of soil compaction.
5. A requirement for the Applicants to cooperate with the Environment Agency in designing management measures that would increase flood storage in the West Glen River Corridor as well as enhancing biodiversity. The applicants should be required to make an appropriate contribution to the cost of this work to ensure that it was delivered in time to offset any additional flood risk from the Mallard Pass Development, to ensure that the works could deliver biodiversity net gain in the river corridor and to ensure that they could hold back surface water as well as fluvial flows to reduce or prevent floods downstream.

None of these proposed additional requirements would be particularly expensive, so I cannot see that they would have any significant impact on the commercial viability of the development.