

Stonestreet Green Solar

Environmental Statement

Volume 4: Appendices

Chapter 9: Biodiversity

Appendix 9.8: Cumulative Assessment

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Appendix 9.8: Cumulative Assessment

9.1 Introduction

- 9.1.1 This cumulative assessment has been prepared on behalf of EPL 001 Limited ('the Applicant') and reports the cumulative assessment which forms part of the assessment of effects in relation to the Development Consent Order ('DCO') application for Stonestreet Green Solar ('the Project').
- 9.1.2 This cumulative assessment forms **Appendix 9.8 to ES Volume 2, Chapter 9: Biodiversity (Doc Ref. 5.2)**.

9.2 Cumulative Effects

- 9.2.1 An assessment of cumulative effects has been made with reference to the methodology and guidance set out in **ES Volume 2, Chapter 6: EIA Methodology (Doc Ref. 5.2)**.
- 9.2.2 When assessing cumulative effects, two potential cumulative pathways have been assessed:
- Intra-project effects - impacts generated by the Project which may not be significant within but may combine with impacts from a cumulative scheme to contribute to a significant effect. For example, light and noise may combine to create a significant in-combination effect from two non-significant effects. Intra-project effects are considered in **ES Volume 2, Chapter 9: Biodiversity (Doc Ref. 5.2)** and not in this appendix. The intra-project assessment reviewed impacts which have the potential to have an in-combination effect greater than their individual impact, including disturbance (noise, lighting), pollution, habitat loss and species mortality. The majority of these impacts occur within the Project during the construction phase and all are assessed as not significant due to Embedded Mitigation measures secured through the **Outline LEMP (Doc Ref. 7.10)** and **Outline CEMP (Doc Ref. 7.8)**.
 - Inter-project effects - the effects that may be additive or incremental in relation to other developments' impacts with that of the Project.
- 9.2.3 Inter-project effects with cumulative schemes have been assessed within this Appendix where construction, operational or decommissioning phase impacts may interact temporarily or spatially within geographic ranges with potential to affect the same habitat networks or species populations as those using the Site.
- 9.2.4 **Table A9.1** presents an assessment of the potential for significant effects with schemes within the Zol of the Project. Further commentary is then provided in **Section 9.3** of this Appendix on those projects identifies as having potential for cumulative effects.

- 9.2.5 The predicted residual significant adverse effects of the Project upon skylark (construction and operational phases), yellowhammer (construction phase) and brown hare (construction phase) are considered to be effects that could act in tandem with other schemes. This is due to the associated significant areas of agricultural landscape (potentially suitable habitats for these species) affected by some of the cumulative schemes.
- 9.2.6 The potential for non-significant effects arising from the Project to become significant in combination with the other cumulative schemes is also considered. This element of the cumulative effect assessment comprises a review of the following aspects of cumulative schemes, which are assessed against the works timings and mitigation within the Project (as part of the **Outline LEMP (Doc Ref. 7.10)** and **Outline CEMP (Doc Ref. 7.8)**):
- Ecological baseline and predicted effects;
 - Scheme size;
 - Distance from the Project;
 - Habitat connectivity between the cumulative scheme and the Project;
 - Presence or absence of ecological barriers between the cumulative scheme and the Project; and
 - Mitigation within the cumulative schemes.

Table A0.1: Cumulative Assessment

Cumulative Scheme	Potential Cumulative Impact	Additional Mitigation	Potential Residual Cumulative Effect / Significance
ID No. 3: Pivot Power Battery Storage PA/2022/2544	<p>Construction, Operation and Decommissioning: No effect</p> <p>No reference to skylark, yellowhammer or brown hare within the available update ecological appraisal¹.</p> <p>Review of available layout, BNG and landscape proposals show land take limited to a corner of an existing arable field with adjacent habitat retained. Unlikely to result in significant cumulative effects based on size and provision of grassland within the proposed cumulative scheme landscape.</p> <p>This cumulative scheme is separated from the Project by the railway corridor and distance, limiting connectivity to onsite habitats and species and the potential for cumulative effects for other ecological features. No cumulative effects are therefore identified.</p>	None required	Neutral (not significant)
ID No. 4: Walsh Power Condenser Project PA/2022/2950	<p>Suitability of the site for nesting birds is identified with the Preliminary Ecological Appraisal² accompanying the application, although no specific reference to yellowhammer or skylark is made. Brown hare was assessed as unlikely to be present.</p> <p>The majority of the site is comprised of hardstanding. While the site does include some area of arable field this appears to be retained / re-instated from review of available layouts and planting plans³ (which include additional grassland meadow and hedgerow creation) and is of a limited size (c. 1ha).</p>	None required	Neutral (not significant)

Cumulative Scheme	Potential Cumulative Impact	Additional Mitigation	Potential Residual Cumulative Effect / Significance
	<p>This cumulative scheme is separated from the Project by the railway corridor and distance, limiting connectivity to on-site habitats and species, and potential for cumulative effects for other ecological features. The relative small size of the site combined with the habitat proposals further reduces the likelihood of cumulative effects. No cumulative effects are therefore identified.</p>		
<p>ID No. 5: Land Adjacent The Surgery Main Road Sellindge Kent Y14/0873/SH</p>	<p>Construction, Operation and Decommissioning: No effect</p> <p>No reference to skylark, yellowhammer or brown hare within the available ecological appraisal⁴. Loss of arable land with retention of majority of boundary habitats stated. Habitat compensation on-site does not appear to offer open space provision.</p> <p>Previous loss of arable habitats from now completed development in proximity to the Project represents a potential cumulative effect on all three species but at distance beyond 1km. No cumulative effects are therefore identified.</p>	<p>None required</p>	<p>Neutral (not significant)</p>
<p>ID No. 7: Land north of 1, Church View, Aldington, Kent 19/00895/AS</p>	<p>Construction, Operation and Decommissioning: No effect</p> <p>Review of the available ecological documentation (Preliminary Ecological Appraisal⁵) for this project does not detail results for yellowhammer, skylark or brown hare, but does acknowledge that these species are likely using the cumulative scheme site and adjacent areas. Unlikely to result in significant cumulative effects based on size of site and development (six dwellings), located adjacent to existing residential.</p> <p>Proximity to the Project is acknowledged but this cumulative scheme site is separated from the Project's PV infrastructure by over 100m, which limits potential</p>	<p>None required</p>	<p>Neutral (not significant)</p>

Cumulative Scheme	Potential Cumulative Impact	Additional Mitigation	Potential Residual Cumulative Effect / Significance
	for combination of indirect construction effects (light, noise, pollution). No cumulative effects are therefore identified.		
ID No. 8: Land south west of Goldwell Court, Goldwell Lane 20/00652/AS	<p>Construction, Operation and Decommissioning: No effect</p> <p>The available ecological documentation (Preliminary Ecological Appraisal⁶) does not provide detailed information for yellowhammer, skylark or brown hare but acknowledges that these species are likely using the cumulative scheme site and adjacent areas.</p> <p>Scheme layout shows the development footprint generally limited to improved grassland paddocks with replacement hedgerows proposed and development is small in extent. Unlikely to result in cumulative effects based on size of development (11 dwellings), which is also located adjacent to the existing road.</p> <p>Proximity to Project is acknowledged but this cumulative scheme site is separated from PV infrastructure by over 100m, which limits potential for combination of indirect construction effects (light, noise, pollution). No cumulative effects are therefore identified.</p>	None required	Neutral (not significant)
ID No. 9: East Stour Solar Farm 22/00668/AS	<p>Construction, Operation and Decommissioning: No effect</p> <p>This scheme was refused by ABC although has still be considered in the assessment as a worst case.</p> <p>The ES⁷ and Supplementary Environmental Information⁸ describes skylark and yellowhammer recorded as being present on-site, with detailed mitigation provided for skylark in the form of open space ecological mitigation areas.</p>	None required	Neutral (not significant)

Cumulative Scheme	Potential Cumulative Impact	Additional Mitigation	Potential Residual Cumulative Effect / Significance
	<p>Brown hare assessed as likely absent.</p> <p>This cumulative scheme is separated from the nearest Project PV infrastructure by over 500m, which reduces potential for combination of indirect construction effects. This cumulative scheme is adjacent to Backhouse Wood LNR / ancient woodland, however the Project and this scheme will not result in cumulative adverse effects upon this feature as neither result in an effect on this feature. The cumulative scheme incorporates a 15m buffer from the East River Stour to avoid effects, noting that both the Project and ID No. 9 are situated adjacent to this feature.</p> <p>Mitigation provided within scheme for skylark, resulting in no potential for cumulative effects.</p>		
<p>ID No. 10: Otterpool Park Development Y19/0257/FH</p>	<p>Construction, Operation and Decommissioning: No effect</p> <p>Skylark and yellowhammer recorded at a County level of importance due to scheme size and habitats with brown hare recorded in very low numbers. ES⁹ acknowledges that mitigation on-site is not achievable due to extensive habitat loss and so proposes an off-site offsetting mitigation strategy of long term, extensive enhancement of adjacent farmland.</p> <p>Mitigation provided as part of the cumulative scheme (off-site offsetting mitigation strategy within FHDC), so no potential for cumulative effects.</p>	<p>None required</p>	<p>Neutral (not significant)</p>
<p>ID No. 14: Land Rear Rhodes, House, Main</p>	<p>Ecological survey reports for the outline application could not be located on the Folkestone and Hythe District Council for either the outline or Phase 2 reserved matters applications. No reference to yellowhammer, skylark or brown hare could be seen in the KCC and Natural England consultation comments; with reptile</p>	<p>None required</p>	<p>Neutral (not significant)</p>

Cumulative Scheme	Potential Cumulative Impact	Additional Mitigation	Potential Residual Cumulative Effect / Significance
Road, Sellindge, Kent Y16/1122/SH 22/0053/FH	<p>mitigation, Habitats Regulations Assessment (HRA) and lighting being among the consultation points raised. The site does comprise primarily arable land which could support yellowhammer, skylark and/or brown hare. Review of available layout and landscape plans does show inclusion of natural open space (including woodland, swales and grassland), although the relationship between these and mitigation of effects upon biodiversity is unknown.</p> <p>The scheme is separated from the Project by the M20, a railway corridor and urban development. Given the lack of habitat connectivity, in combination with distance from the Project, it is assessed that there is no potential for cumulative effects.</p>		
ID No. 16: Land south of Park Farm East, Hamstreet Bypass, Kingsnorth, Kent 18/00652/AS	<p>Construction, Operation and Decommissioning: No effect</p> <p>Loss of skylark habitat acknowledged in ES¹⁰ with creation of 4ha of suitable habitat to be incorporated within the scheme. KCC EAS comments¹¹ noted request for additional skylark plots to be incorporated within the cumulative scheme. Brown hare not recorded during surveys. One yellowhammer territory was recorded during surveys.</p> <p>Mitigation provided within cumulative scheme (i.e. set aside open space ecological mitigation areas), so no potential for cumulative effects.</p>	None required	Neutral (not significant)
ID No. 18: Land South of Captains Wood Land at Cheesemans Green,	<p>Construction, Operation and Decommissioning: No effect</p> <p>Loss of 24ha skylark habitat and brown hare habitat acknowledged in ES¹² but with stated extensive alternative suitable habitat in surrounding arable habitats. Brown hare 'occasionally' recorded on cumulative scheme site during 2009-2014</p>	None required	Neutral (not significant)

Cumulative Scheme	Potential Cumulative Impact	Additional Mitigation	Potential Residual Cumulative Effect / Significance
Cheesemans Green Lane, Kingsnorth, Kent.16/00125 /AS	<p>but not during 2015. One territory of skylark and one territory of yellowhammer recorded during surveys.</p> <p>Negligible loss of skylark habitat stated in ES⁹, given low numbers recorded.</p> <p>Cumulative scheme now partially constructed so no interaction with construction phase effects upon brown hare. Distance from Project limits potential for other cumulative effects.</p>		
ID No. 19: Finberry North West N/A	<p>Construction, Operation and Decommissioning: No effect</p> <p>No planning portal documentation could be located. Potential for similar effects to ID No. 18 due to proximity, habitats and potentially part of same Finberry wider development complex.</p> <p>Potential for cumulative effects limited by distance from Project and extensive alternative habitat for all species present between ID No. 19 and the Project.</p>	None required	Neutral (not significant)
ID No. 20: Waterbrook Park, Waterbrook Avenue, Sevington, Kent 18/00098/AS	<p>Construction, Operation and Decommissioning: No effect</p> <p>No reference to brown hare within ES¹³ baseline or impact assessment. One territory of skylark recorded with yellowhammer present but assessed as non-breeder. Residual loss and alteration of breeding bird habitat acknowledged in ES¹⁰ with potentially only one skylark territory impacted.</p> <p>No cumulative effects due to limited cumulative scheme impacts, distance of approx. 2km and extensive alternative habitat for all species present between ID No. 17 and the Project.</p>	None required	Neutral (not significant)

Cumulative Scheme	Potential Cumulative Impact	Additional Mitigation	Potential Residual Cumulative Effect / Significance
<p>ID No. 25: Land at Pound Lane, Magpie Hall Road, Bond Lane and, Ashford Road, Kingsnorth, Kent15/00856/AS</p>	<p>Construction, Operation and Decommissioning: No effect</p> <p>No reference to brown hare within ES¹⁴ baseline or impact assessment. One pair of skylark and unspecified numbers of breeding and wintering yellowhammer were recorded. The breeding bird report for the application has been classed as confidential and could not be accessed at the time of writing (March 2024). With open space mitigation as set out in the ES addendum¹⁵, effects on ground nesting birds are assessed as negligible.</p> <p>Mitigation is provided by the cumulative scheme, noting the scheme is at significant distance from Project. There is therefore no potential for cumulative effects.</p>	<p>None required</p>	<p>Neutral (not significant)</p>
<p>ID No. 21: Land south-west of junction of, Bullfinch Avenue, Finberry, Sevington, Ashford 19/01232/AS</p>	<p>Construction, Operation and Decommissioning: No effect</p> <p>Ecology report not available on planning portal at time of writing (March 2024). KCC EAS advice letter¹⁶ does not refer to presence or mitigation requirements in relation to skylark or yellowhammer. Wider biodiversity mitigation/enhancements (some appropriate for brown hare) for the whole Finberry development have been agreed.</p> <p>Distance of approx. 2km avoids cumulative effects; and extensive alternative habitat for all species is present between ID No. 18 and the Project. Therefore no potential for cumulative effects.</p>	<p>None required</p>	<p>Neutral (not significant)</p>
<p>ID No. 22: Land at Cheesemans</p>	<p>Construction, Operation and Decommissioning: No effect</p>	<p>None required</p>	<p>Neutral (not significant)</p>

Cumulative Scheme	Potential Cumulative Impact	Additional Mitigation	Potential Residual Cumulative Effect / Significance
<p>Green, Cheesemans Green Lane, Kingsnorth, Kent 02/00277/AS (as amended by 11/00473/AS)</p>	<p>The ES (2001)¹⁷ references presence of skylark, yellowhammer (especially numerous) and brown hare on cumulative scheme site but limited detail is provided.</p> <p>Distance of approx. 2km avoids potential for cumulative effects and extensive alternative habitat for all species is present between ID No. 19 and the Project.</p>		
<p>ID No. 30: Land at Court Lodge, Pound Lane, Kingsnorth 18/01822/AS</p>	<p>Construction, Operation and Decommissioning: No effect</p> <p>Yellowhammer and skylark were recorded in winter and summer¹⁸. Breeding peaks of seven and fourteen, respectively. The probable number of skylark breeding males was estimated to be two based on territories held. Peak winter counts were 17 and 19. No reference to brown hare could be located in the planning application documents.</p> <p>Mitigation provided within the cumulative scheme (set aside open space ecological mitigation areas). There is therefore no potential for cumulative effects.</p>	<p>None required</p>	<p>Neutral (not significant)</p>
<p>ID No. 31: Conningbrook, Willesborough Road, Kennington, Kent 12/01245/AS</p>	<p>Construction, Operation and Decommissioning: No effect</p> <p>The ES¹⁹ showed wintering recording of yellowhammer and skylark but not breeding. No reference to brown hare could be located in the planning application documents. Impacts assessed as non-significant on wintering birds (yellowhammer and skylark), no potential for cumulative effects.</p>	<p>None required</p>	<p>Neutral (not significant)</p>

Cumulative Scheme	Potential Cumulative Impact	Additional Mitigation	Potential Residual Cumulative Effect / Significance
	The cumulative scheme is significant distance from the Project, no effects were identified in the ES and therefore cumulative effects are unlikely.		
<p>ID No. 32: Land between railway line and Willesborough Road, Kennington, Kent19/00025/AS</p> <p>Land NE of Willesborough Road, Kennington</p> <p>OTH/2022/2049</p>	<p>Construction, Operation and Decommissioning: No effect</p> <p>The ES²⁰ confirmed skylark were recorded on the cumulative scheme site in unspecified numbers (bird reports could not be located on planning portal). Yellowhammer appears not to be recorded. Loss of skylark habitat (arable) acknowledged but not assessed as significant. No reference to brown hare could be located in the planning application documents.</p> <p>The cumulative scheme is located at significant distance from Project and unlikely to result in cumulative effects.</p>	None required	Neutral (not significant)
<p>ID No. 33: Pent Farm Solar 23/0580/FH</p>	<p>Construction, Operation and Decommissioning: No effect</p> <p>At least three territories of skylark and three territories of yellowhammer were recorded within this cumulative scheme site, based on review of the breeding bird survey report (Avian Ecology 2023a)²¹ and Ecological Impact Assessment (Avian Ecology 2023b)²². The Biodiversity Management Plan²³ identifies proposed</p>	None required	Neutral (not significant)

Cumulative Scheme	Potential Cumulative Impact	Additional Mitigation	Potential Residual Cumulative Effect / Significance
	<p>mitigation and enhancement measures for habitats (i.e., hedgerow infilling and species rich grassland planting).</p> <p>Comments from KCC EAS²⁴ confirmed no expected significant impact upon these species due to improvement of foraging habitat and extensive availability of nearby alternative nesting habitat. No detailed survey or assessment for brown hare was found from review of the publicly available planning documents.</p> <p>The cumulative scheme is located at significant distance from Project and (taking into consideration the mitigation included within the scheme) is unlikely to result in cumulative effects.</p>		
<p>ID No. 34: Nickolls Quarry, Dymchurch Road Hythe, Kent Y19/1492/FH</p>	<p>Construction, Operation and Decommissioning: No effect</p> <p>The ES²⁵ found skylark and yellowhammer were recorded as holding more than one territory. No reference to brown hare could be located in the planning application documents. Not possible to assess effect on brown hare.</p> <p>With mitigation provided within cumulative scheme (wetland and grassland ecological mitigation areas), no effect was predicted for breeding birds and a minor beneficial effect was predicted for wintering birds.</p> <p>The cumulative scheme is located at significant distance from Project and unlikely to result in cumulative effects.</p>	<p>None required</p>	<p>Neutral (not significant)</p>
<p>ID No. 35: Land at Chilmington Green, Ashford</p>	<p>Construction, Operation and Decommissioning: No effect</p> <p>The ES from 2012 submitted with the application could not be located. The ES addendum²⁶ assessed a minor significant beneficial effect on breeding and</p>	<p>None required</p>	<p>Neutral (not significant)</p>

Cumulative Scheme	Potential Cumulative Impact	Additional Mitigation	Potential Residual Cumulative Effect / Significance
Road, Great Chart, Kent 12/00400/AS	<p>wintering birds due to favourable long-term management of 66ha of open farmland and other habitats. No reference to brown hare could be located in the planning application documents.</p> <p>Likely significant beneficial effect for skylark, yellowhammer and brown hare based on landscape proposals, but large distance from Project means there is limited potential for cumulative effects.</p>		
ID No. 36: Land at Eureka Business Park, Trinity Road, Boughton Aluph, Kent 21/02146/AS	<p>Construction, Operation and Decommissioning: No effect</p> <p>The ES²⁷ and baseline survey reports stated that one territory recorded for both skylark and yellowhammer, both within habitats to retained by development. No reference to brown hare could be located in the planning application documents.</p> <p>The cumulative scheme is a significant distance from the Site and unlikely to result in cumulative effects based on distance. Also due to the low number of territories recorded and proposed habitat retention for this cumulative scheme.</p>	None required	Neutral (not significant)

9.3 Summary of Cumulative Assessment

Construction Phase Cumulative Assessment

- 9.3.1 The clearance and construction phase of the Project will overlap with a number of cumulative schemes that will either have been constructed or could be under construction during the same time period of 12 months. Some of these schemes will (or have) result(ed) in a loss of the arable, grassland and hedgerow habitats utilised by skylark, yellowhammer, and brown hare populations within the local and county areas.
- 9.3.2 However, not all cumulative schemes will have been subject to clearance and construction activities by the time of the Project construction phase (2026). There is also likely to be a phased approach to site clearance given the scale of some sites. Not all farmland habitats are therefore likely to be cleared in the first year of these schemes' construction programmes.
- 9.3.3 Temporary disturbance and displacement of skylark, yellowhammer and brown hare may also occur during the construction phase. When cumulative schemes are under construction at the same time, this could limit locally available habitat available for temporary dispersal of these species. Given the distribution of the cumulative schemes (generally at distance from the Project), available habitat in the adjacent and wider landscape and that vegetation clearance works will be undertaken outside of the bird nesting season (where possible), the potential for cumulative impacts from temporary disturbance and displacement (applicable to multiple ecological features, primarily species) are reduced.
- 9.3.4 The most relevant schemes to construction loss of habitats and disturbance are the largest schemes within proximity to the Project with confirmed presence of skylark, yellowhammer and brown hare populations as follows:
- ID No. 9: East Stour Solar Farm;
 - ID No. 3: Pivot Power Battery Storage; and
 - ID No. 10: Otterpool Park Development.
- 9.3.5 Other large cumulative schemes at distances beyond 1km will interact with species populations within the county but are less likely to directly interact with species populations using the Site. As a result, this cumulative assessment focuses on the on the above schemes.

ID No. 9: East Stour Solar Farm

- 9.3.6 Site-specific ecological information available for ID No. 9 East Stour Solar Farm (as indicated on ABC's planning portal page for this scheme) comprises the ES, Volume 3 (Figures Part 1) of the ES⁷ and Appendix 10.2 Table of Breeding Bird Survey Results submitted with that application. The ES⁷ confirms that habitats suitable for yellowhammer, skylark and brown hare are present on the East Stour Solar Farm site. The ES⁷ also confirms that brown hare is likely absent from the East Stour Solar Farm site. In relation to skylark, this species was confirmed as breeding on the East Stour Solar Farm site, with between two and three breeding pairs present.

Yellowhammer was attributed probable breeder status, with between two and four breeding pairs likely to be present.

- 9.3.7 The ES⁷ concludes that the delivery of new areas of grassland on the cumulative scheme site will offset construction stage losses of skylark habitat and achieve a net 'neutral' effect upon this species (once mitigation is established). It is not specified, but this neutral effect is assumed to become effective during the operational phase. No detail of mitigation or residual effects is provided for yellowhammer.
- 9.3.8 ID No. 9 East Stour Solar Farm is located adjacent to the Field 26-29 BIA within the Project. This area of the Project is comprised almost exclusively of landscape enhancement with limited construction and no adverse operational effects occurring in this area. As the nearest Project PV infrastructure is located over 500m from ID No. 9, there is no potential for combination of noise, light, vibration or other construction and operation indirect impacts between the Project and ID No. 9. The BIA and retained habitats within both schemes also provide an extensive retained habitat buffer between the Project and ID No. 9.
- 9.3.9 The ID No. 9 ES concludes long term beneficial effects upon grassland (major), woodland and hedgerow (major) and waterbodies and the East Stour River (neutral to minor positive) based upon extensive creation of habitats and the inclusion of a minimum 15m landscape buffer for the East Stour River. This would potentially interact with the beneficial effects of the Project upon these habitats but not to an extent to increase the geographical valuation beyond local.
- 9.3.10 Negligible adverse to minor positive were assessed overall within the ID No. 9 ES for dormouse, bats, otter, water vole and breeding birds when accounting for scheme impacts and mitigation including construction phase controls and habitat creation. In the context of the Project, these have been assessed to not lead to cumulative effects.
- 9.3.11 Based on the above, no cumulative effects with the Project are predicted for brown hare, and no significant cumulative effects are predicted for skylark and yellowhammer.
- 9.3.12 On the assumption that the ID No. 9 East Stour Solar Farm scheme will result in some loss of yellowhammer habitat, but considering the fact that only two to four pairs of potentially breeding yellowhammer could be affected. The predicted geographic significance of the adverse effect of the Project upon yellowhammer is not predicted to materially increase when assessed in cumulation with the East Stour Solar Farm scheme and no cumulative effects predicted.

ID No. 3: Pivot Power Battery Storage

- 9.3.13 Site-specific ecological information available for ID No. 4 Pivot Power Battery Storage scheme (as indicated on ABC's planning portal page) comprises an ecological appraisal, BNG assessment and other layout and landscape documents. The available ecological appraisal¹ confirms that arable fields, semi-improved grassland and hedgerows are present within the cumulative scheme site. There is no detailed survey information available for yellowhammer, skylark and brown hare

but based upon distribution with Kent and biological records it is likely these species are present.

- 9.3.14 The detailed proposals for the scheme show a site extent of approximately 2 ha, adjacent to Sellindge Substation and occupying the southern extent of an arable field, encompassing an approximate third of the existing field. The available landscape proposals show additional woodland screening planting and areas of grassland, with a BNG Assessment²⁸ confirming an approximate 20% gain in habitat units. While the proposed habitats do not offer the optimum open space habitat for skylark, yellowhammer and brown hare, they do provide a habitat mosaic including grassland and would potentially provide an increase in the locally available foraging habitats. This is assessed in context of the retention of large arable field expanses to the north.
- 9.3.15 The ID No. 3 Pivot Power Battery Storage scheme would not result in the removal of extensive areas of suitable habitat for skylark, yellowhammer and brown hare. Habitat impacts upon other species would likely be minimised with the scheme footprint restricted to existing arable cropland.
- 9.3.16 The location of ID No. 3 Pivot Power Battery Storage in relation to the Project (adjacent to Sellindge but separated from the arable habitats to be impacted by a railway, woodland belt and developed land) reduces its potential use for dispersing and displaced species, given the barriers between this Scheme and the Project. These barriers and distance also avoid the potential for combination of noise, light, vibration or other construction and operation indirect impacts between the Project and this cumulative scheme.
- 9.3.17 The predicted geographic significance of the adverse effect of the Project upon skylark, yellowhammer and brown hare (and other ecological features) is not predicted to materially increase when assessed in cumulation with ID No. 3 'Pivot Power Battery Storage scheme.

ID No. 10: Otterpool Park Development

- 9.3.18 The site-specific ecological information available for ID No. 10 Otterpool Park Development (available on FHDC's planning portal page for this scheme) includes that comprises that contained within the ES⁹ and associated appendices including bird survey appendices.
- 9.3.19 The Otterpool Park ES⁹ assesses the populations of skylark and yellowhammer (among other breeding and wintering bird species) recorded as being of County significance. The ES confirms recording of very low numbers of brown hare and acknowledges loss of habitat impact of this scheme. The size, scale and potential phasing of this cumulative scheme make it likely that phased build out will be occurring through at least the first half of the operational lifespan of the Project.
- 9.3.20 The Otterpool Park ES⁹ acknowledges that due to the scale of development and importance of population, that mitigation within the Site cannot reduce residual impacts to non-significant. An additional off-site mitigation 'offsetting' strategy is outlined within the Otterpool Park ES. This strategy details an outline approach for

farmland habitat enhancements on 597.5ha of farmland within the local area for a period of 30 years. As the scheme will be phased, this offsetting strategy will also be phased alongside, with the details of each phase of offsetting to be confirmed as part of each application.

- 9.3.21 The Otterpool Park ES indicates that the offsetting strategy would be delivered through a Section 106 or similar legal agreement. The off-site offsetting strategy was incorporated into the assessment of residual effects to reduce effects on skylark, yellowhammer and brown hare to non-significant.
- 9.3.22 The majority of ID No. 10 is located beyond 1km from the eastern extreme of the Project, and even further away from the areas of arable habitat loss once the cable route sections (where no permanent loss of habitat will occur) are taken into account. This distance means that this cumulative scheme site is unlikely to be utilised by species dispersing from construction phase activities as alternative habitat and that combination of indirect disturbance effects between the Project and this cumulative scheme will not occur.
- 9.3.23 The proposed enhancement of farmland as part of the Otterpool Park offsetting mitigation strategy could provide enhancements in closer proximity to the Project than the scheme, however the details of the offsetting mitigation strategy have yet to be secured.
- 9.3.24 The predicted geographic significance of the adverse effect of the Project upon skylark, yellowhammer and brown hare is not predicted to materially increase when assessed in cumulation with ID No. 10 Otterpool Park Development.
- 9.3.25 Within the ES, the residual effects from ID No. 10 Otterpool Park Development are restricted to the increase of habitat value calculated from the BNG assessment (moderate beneficial) and removal of invasive species (moderate beneficial). While the habitat residual effect is likely to benefit associated species and habitats, overall, these residual effects are not predicted to materially increase any effects resulting from the Project (i.e. no cumulative effects predicted).

Other Cumulative Schemes

- 9.3.26 The remaining cumulative schemes contain those which have interactions with skylark, yellowhammer and brown hare populations at a county level but are generally unlikely to directly impact (to a significant degree) the same populations of these species using the Site due to distance. Interaction is assessed as more likely for skylark and yellowhammer (which are residential bird species but do undertake seasonal movements and dispersal) than brown hare (dispersal through connected habitats and a less mobile species).
- 9.3.27 County populations of these species do interact with the historic removal of arable fields and associated open space from past cumulative schemes (which are now mostly completed). More recent cumulative schemes have however often incorporated their own open space mitigation for such species as the county level effect of habitat loss has become apparent and addressed in such planning applications in recent years.

- 9.3.28 Given the complexity of county species trends (e.g. historically declining skylark trends now stabilising and increasing in south east England (BTO, 2023)²⁹, potential for other effects from other activities in the county over the long term (changes in agricultural management, land use, habitat offsetting etc), such schemes at distance are only discussed in detail if a clear cumulative connection to populations using the Site is apparent.
- 9.3.29 The predicted geographic significance of the adverse effect of the Project upon skylark, yellowhammer and brown hare (and other ecological features) is not predicted to materially increase when assessed in cumulation with the remaining schemes (i.e., no cumulative effects predicted).

Operational Phase Cumulative Assessment

- 9.3.30 The operational phase of the Project will overlap with known cumulative schemes that will either have been constructed or may be under construction during the 40-year period. Some of these schemes will (or have) result(ed) in a loss of the arable grassland and other open space habitats utilised by skylark, populations within the local and county areas.
- 9.3.31 The most relevant schemes are the following largest schemes in proximity to the Project with confirmed presence of skylark populations to be impacted are:
- ID No. 9: East Stour Solar Farm;
 - ID No. 3: Pivot Power Battery Storage; and
 - ID No. 10: Otterpool Park Development.
- 9.3.32 Other large cumulative schemes at distances beyond 1km will interact with skylark populations within the county but are less likely to directly interact with species populations using the Site. As described under the **Construction Cumulative Assessment**, such schemes are only assessed when clear linkages with Project populations are apparent, due to the uncertainty when assessing long term interactions with the wider county species population.
- 9.3.33 ID No. 3 Pivot Power Battery Storage scheme is expected to be constructed and then operational during the operational phase of the Project but will not result in removal of large areas of skylark habitat (as described in construction assessment).
- 9.3.34 ID No. 9 East Stour Solar Farm will also be operational, but with on-site ecological mitigation expected to be established and functional during this time period.
- 9.3.35 ID No. 10 Otterpool Park Development will likely be continuing its phased build out during at least the first half of the operational lifespan, but also with its off-site offsetting mitigation strategy being implemented in farmland adjacent to that scheme.
- 9.3.36 Remaining schemes at distance are likely to be under construction or completed with most schemes expected to be complete during the first half of the operational life span of the Project.

9.3.37 The predicted geographic significance of the adverse effect of the Project upon skylark, yellowhammer and brown hare is therefore not predicted to materially increase when assessed in cumulation with other projects (i.e., no cumulative effects predicted).

Decommissioning Phase

9.3.38 The Project, in isolation and once secondary and tertiary mitigation has been implemented, is not predicted to result in significant residual adverse effects. This is due to the retention of the most important habitats, species and associated receptor areas and BIAs in combination with detailed mitigation proposals informed by updated ecological baseline surveys and secured by the **Outline DEMP (Doc Ref. 7.12)**.

Mitigation, Monitoring and Residual Effects

9.3.39 No further mitigation or monitoring is required, and no residual cumulative effects are expected.

References

- ¹ TetraTech (2022). *Sellindge Substation, Kent Update Ecological Appraisal B029319, V2.*
- ² Seasons Ecology (2022). *Land to the north-west of Church Lane, Sellindge. Preliminary Ecological Appraisal*
- ³ Sweco (2023). *Sellindge Grid Stability Facility. Figure 6 Planting Proposals. 65206511-SWE-XX-XX-D-L-006*
- ⁴ Ecology Solutions Ltd (2014). *Land at Sellindge. Ecological Appraisal. 570. July 2014.*
- ⁵ Corylus Ecology (2019). *Land Adjacent To Goldwell Lane, Aldington, Kent Preliminary Ecological Appraisal Survey Report. Ref 19078.*
- ⁶ Fellgrove (2019). *Preliminary Ecology Appraisal Land at Goldwell Lane, Aldington, Ashford, Kent. Ref 6499.*
- ⁷ Engena Limited (2022) *East Stour Solar Farm. ES Volume 2A - Written Statement.*
- ⁸ <https://ashfordboroughcouncil.my.site.com/pr/s/planning-application/a0h8d000000ZbpsAAC/2200668as?tabset-9095e=3>
- ⁹ Arcadis (2022). *Otterpool Park. ES OP5 Chapter 7 - Ecology and Biodiversity. March 2022.*
- ¹⁰ CSA Environmental- (2018). *Park Farm South East, Ashford, Kent Ecological Impact Assessment Report No: CSA/2969/02. April 2018.*
- ¹¹ Kent County Council Ecological Advice Service (2018). *18/00652/AS Land south of Park Farm East, Kingsnorth. 06 June 2018.*
- ¹² Atkins (2016). *Sevington Lake, Woodbank and Captain's Wood, Reserved Matters Ecological Impact Assessment ATK/CG/0000/0127. Atkins.*
- ¹³ DHA Environment (2018). *Waterbrook Park Phase 2,. ES Chapter 9 Ecology.*
- ¹⁴ Wardell Armstrong (2015). *Kingsnorth Green ES. Ref ST13901. June 2015.*
- ¹⁵ Wardell Armstrong (2022). *Kingsnorth Green ES Addendum. ST18721 October 2022.*
- ¹⁶ Kent County Council Ecological Advice Service (2020). *19/01232/AS / Land south-west of junction of Finberry. 30 March 2020.*
- ¹⁷ Atkins (2001). *Cheeseman's Green: South Ashford. Addendum to ES. Ecology.*
- ¹⁸ Hallam Land Management Limited (2018) *Court Lodge. Ashford. ES Vol.1 Chapters.*
- ¹⁹ Bioscan (2012). *Land At Conningbrook Lakes, Ashford. Ecology and Nature Conservation. October 2012. Report Ref: E1353R3fv.*
- ²⁰ Entran (2019). *Conningbrook Park, Land NE of Willesborough Road, Ashford ES Addendum: Volume 1, Main Text.*
- ²¹ Avian Ecology (2023a) *Pent Farm Solar. ES. Appendix 2: Breeding Bird Survey Report.*

- ²² Avian Ecology (2023b) Pent Farm Solar. ES: Ecological Assessment Report.
- ²³ Avian Ecology (2023c) Pent Farm Solar. ES. Appendix 3: Biodiversity Management Plan.
- ²⁴ Kent Ecological Advice Service (2023). Pent Farm, Pilgrims Way 23/0580/FH. 19 May 2023.
- ²⁵ CSA Environmental (2019). *Nickolls Quarry, Hythe. Ecological Impact Assessment. CSA/4355/02.*
- ²⁶ WSP (2012). *Chilmington Green. ES Addendum, Volume 1. Chapter A9: Ecology and Nature Conservation.*
- ²⁷ DHA Planning (2021). *Land at Eureka Park, Ashford. Quadrant Eureka LLP. ES – October 2021. TS/14384.*
- ²⁸ TetraTech (2022). *Sellindge Substation, Kent. Biodiversity Net Gain Assessment.*
- ²⁹ BTO (2023). *The Breeding Bird Survey 2022 incorporating the Waterways Breeding Bird Survey. Population trends of the UK's breeding birds.* British Trust for Ornithology.