

Buglife would like to make the following additional representation concerning this application.

Buglife submitted relevant representations on 3rd September 2024 highlighting concerns that mitigation measures are not being implemented to safeguard populations of aquatic invertebrates from the effects of polarised light from solar panels. Since submitting our relevant representation, we are not aware that any further information has been provided on the mitigation proposals and therefore nothing has changed to allay our concerns of the impact of the scheme on aquatic invertebrates.

To summarise our concerns, the location of the proposals is within a landscape of wetland features, both within the site and in close proximity. This includes the East Stour River, running through the northern section of the site, which alongside the adjacent fen habitat was identified in the Invertebrate Survey Report (ES Volume 4, Appendix 9.5b: Invertebrate Survey Report (Doc Ref. 5.4)) as the richest area for invertebrate diversity on the site.

The Environmental Statement identifies the issue of polarised light from solar panels attracting aquatic invertebrates which then often lay their eggs on the panels, resulting in a failed breeding attempt. This impact is not being addressed at all in the mitigation proposals. Buglife remains unclear if the mitigation has not been deemed necessary due to the results of the invertebrate surveys which indicated a low abundance of mayflies at the time of the survey. Mayflies are just one of the invertebrate groups that the scientific studies have indicated are attracted to polarised light. Buglife reiterates that the invertebrate surveys undertaken are just a snapshot in time of the invertebrate communities present and that these communities could change over time, particularly as the scheme aims to enhance the wetland features on the site during the lifespan of the project.

The mitigation measures needed involve a slight modification to panel design before installation that does not affect electricity generation and is low cost. The measures include a pattern of roughened or painted glass or a horizontal light blocking grid on the panels to reduce their attractiveness to aquatic invertebrates. For a solar park of this scale and in proximity to many wetland habitats, there is the real potential for aquatic invertebrate populations to be adversely impacted.

Buglife would like to strongly recommend that to avoid adverse impacts to aquatic invertebrates, appropriate solar panel mitigation should and must be implemented if the scheme was to gain consent. For no mitigation to be offered at all, given the site's location, is extremely worrying and counter-productive to the measures put forward to enhance biodiversity.