

23rd October 2020

BUNKER'S HILL SOLAR FARM DEVELOPMENT PROPOSAL COMMENTS TO THE CONSULTATION FROM MATTINGLEY PARISH COUNCIL

1. THE WHITEWATER VALLEY

The River Whitewater is a chalk stream, internationally a rare, valuable and fragile habitat, home to a diversity of wildlife and priority species. The Valley environment is at the heart of wildlife corridors between the river ecosystems, fields and hedgerows, and adjacent ancient woodland.

The consultation map has considered national designations, but please also consider local wildlife sites. As per the Whitewater Valley Preservation Society website, the Water Framework Directive identifies the river as a main water body and a Site of Importance for Nature Conservation (SINC).

Forty years of stable land and non-polluting use could provide an incredible opportunity to manage and improve this section of the river environment, and manage the solar farm environment to be wildlife-friendly and improve biodiversity. JBM Solar to please consider as detailed below.

2. FARMLAND ENVIRONMENT

Although farmland there will be wildlife in the fields themselves, and the features such as hedgerows, trees, headlands etc. They will all need to be fully assessed and surveys carried out at the right time of year for protected species such as reptiles, bats and dormice, badger, farmland birds etc. If there are ground nesting birds such as skylark there will be a definite negative impact, it is difficult to mitigate for skylark where the whole site is covered in arrays.

3. WILDLIFE NETWORKS

It will be important to assess how the development affects the ecological network. The Hampshire Ecological Network has been mapped, and part of the development area falls within the mapped network (buffering the Whitewater) see: <https://documents.hants.gov.uk/biodiversity/MappingtheHampshireEcologicalNetworkFinalReport.pdf>

4. CONSTRUCTION

Impacts on the Whitewater during operation and construction must of course be considered. Protecting the Whitewater from pollution was discussed at the September Mattingley Parish Council meeting and assurances given regarding no risk of battery or oil leakage. It's appreciated that long term pollutants should be reduced as won't be the agricultural inputs anymore (providing no intentions to use herbicides).

However regarding construction phase, how to avoid/mitigate potential for eg mud washing into the river, what is the plan for a fuel spill etc? It is anticipated that JBM Solar will produce a Construction Environment Management Plan (CEMP)?

https://www.designingbuildings.co.uk/wiki/Construction_environmental_management_plan

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5. NET GAIN FOR BIODIVERSITY

Beyond mitigation, reference the Environment Bill, it will soon be mandatory to demonstrate net gain mathematically with a Net Gain Calculator: <https://www.environmentbank.com/resource/free-biodiversity-impact-calculator-download/>

And in line with Hart Local Plan Policy NEB4 Biodiversity:

'Opportunities to protect and enhance biodiversity and contribute to wildlife and habitat connectivity are taken where possible, including the preservation, restoration and re-creation of priority habitats, ecological networks, and the protection and recovery of priority species populations. All development proposals will be expected to avoid negative impacts on existing biodiversity and provide a net gain where possible.'

Examples

- i Retain and enhance hedgerows;
- ii Secure some sheep grazing;
- iii Manage the land in between the panels as wildflower meadow (appreciating will need a sustained implementation plan, as establishing wildflower meadows on nutrient rich agricultural land will need some work to reduce the nutrient load before sowing);
- iv Take opportunities to enhance / create wetland areas – the site gets very wet at the margins of the river flood zone – suitable flower mixes for wet areas needed;
- v Plant species mixes across the site should be varied according to location – request a soil survey to inform wildflower sowing.

6. SOLAR FARM WETLAND MARGINS

As iv above. Also to note that local Mattingley landowners believe that the flood zone extends considerably further than planned for.

7. RIVER ENVIRONMENT

As 1. above, and again ref Local Plan Policy NEB4 Biodiversity as 5 above. Please give consideration to long term improvement of the local river ecosystem and habitats. (For eg a sustained programme to erradicate the invasive Himalayan Balsam and replant and re-establish the river banks with suitable native species.)

8 BEST PRACTICE

Mattingley Parish Council requests that JBM Solar strive for best practice for Solar Farms, to be achieved via their a Biodiversity Management Plan, and to cover plans for wildflower meadow creation, hedgerow and hedgerow margins enhancement, wetland creation, river habitat improvements and ongoing monitoring and management:

<https://www.bre.co.uk/filelibrary/pdf/Brochures/NSC-Biodiversity-Guidance.pdf>

The Parish Council requests that JBM Solar considers working with HIWWT regarding the Biodiversity Management plan as above.

Susan Turner

Clerk to Mattingley Parish Council