
From: De-Ruyck, Chris <Chris.De-Ruyck@e-lindsey.gov.uk>
Sent: 07 January 2025 15:20
To: Niland, Mark
Cc: _planningadvice
Subject: H19-0329-24 - Land East of Guanockgate Road

Hello Mark,

I have reviewed the BNG assessment, the PEA, and EcIA submitted with the above application. In regard to the biodiversity assessment, the BNG report and metric calculations appear rigorous and sound, and the authority can be confident that the proposed development will successfully enhance the overall biodiversity value of the site and easily achieve 10% net gain (this includes the proposed uplift of the ditch/watercourse habitats even though these were not included in the BNG metric calculations).

The PEA and EcIA note the presence of a variety of protected species presently on/using the site such as water voles, two schedule-1 bird species and six red-listed bird species of conservation concern, and the documents describe appropriate mitigation measures to minimize the impacts of the development. Broadly, I judge these measures to be adequate, however, I wish to highlight some shortcomings in relation to impacts on nesting birds that are not adequately described in the EcIA.

I believe that the EcIA significantly underestimates the impacts that the development will have on in-field nesting birds such as skylarks. For example, section 4.3.7.b on page 18 disingenuously describes the loss of arable fields as “temporary”. The 40-year lifespan of this development represents a significant time period over which bird populations will show long-term (and not necessarily reversible) responses to these changes in their habitats. Similarly, there is a distinct lack of scientific literature describing how solar panels affect the productivity of field nesting birds, yet the EcIA disingenuously states that a recent RSPB study showed that skylarks generally “occupy” solar arrays on farmland. However, the study in question only examined bird presence/abundance in/around solar arrays and did not examine nesting density or productivity. In contrast, there is some evidence suggesting that skylarks actively avoid “nesting” within solar arrays (e.g., *Montag & Clarkson. 2016. The effects of solar farms on local biodiversity: a comparative study. Clarkson and Woods and Wychwood Biodiversity*). Therefore, covering 140 ha of arable farmland with solar panels will likely significantly reduce skylark populations (a red-listed species) in the landscape. A possible mitigation measure for these impacts would be to require the applicants to secure contracts with neighbouring farmers to put-in a suitable number of skylark plots within the surrounding arable land (e.g., 0.18 skylark territories/ha x 140 ha = 25 plots ; [Skylark conservation - advice for farmers](#)).

My judgement also differs from that expressed in the EcIA in that I believe that Yellowhammers and Linnets are two other red-listed species of conservation concern that could potentially nest on-site, but which are not listed as such within the EcIA. Lastly, there is a small possibility that Marsh Harriers (a schedule 1 protected species) could nest on/near to the site, particularly given their continued presence in the area and the periodic presence of reed-filled ditches on site. Therefore, should permission be granted, I believe that the authority should condition that construction activities be limited to the non-breeding season, and if this is not possible, then the applicants must develop an appropriate mitigation strategy ahead of construction works, which describes in detail the reasonable avoidance measures to be taken to prevent disturbance to harriers or other nesting

species should they be found on or near to the site (RAMS must include harrier-surveys conducted by a suitably qualified ecologist immediately ahead of development work starting).

Thank you very much for your time,
Chris

Chris De Ruyck

Senior Ecologist

South & East Lincolnshire Councils Partnership

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From: Niland, Mark <Mark.Niland@sholland.gov.uk>
Sent: 06 January 2025 14:07
To: De-Ruyck, Chris <Chris.De-Ruyck@e-lindsey.gov.uk>
Cc: _planningadvice (SHDC) <planningadvice@sholland.gov.uk>
Subject: RE: Consultation Request

Hi Chris,

I hope you are well and have had a nice state to 2025!

Are you in a position to make any comments on this scheme please?

Thanks

Mark

From: Niland, Mark
Sent: Wednesday, December 11, 2024 11:55 AM
To: De-Ruyck, Chris (ELDC) <Chris.De-Ruyck@e-lindsey.gov.uk>
Cc: _planningadvice <planningadvice@sholland.gov.uk>
Subject: Consultation Request

Hi Chris,

H19-0329-24 - Land East of Guanockgate Road

I hope you are well?

The above application has been with us prior to you coming on board. We consulted you late September on the application – do you have any comments to make, if not there is no problem. We are looking to assess in the new year.

Kind Regards

Mark

Mark Niland | Planning Officer | South Holland District Council

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