

South Brooks Solar Farm

Preliminary Environmental Information

Volume 2: Environmental Summary

Chapter 5: Biodiversity

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5 Biodiversity

5.1 What is 'biodiversity'

- 5.1.1 Biodiversity can be defined as the variability among living organisms from all sources, including terrestrial, aquatic and marine ecosystems and the ecological complexes of which they are part. It can be quantified in several ways, though using measurable attributes to provide a consistent approach to assessment is necessary.
- 5.1.2 In planning terms in England, biodiversity is often measured as 'habitats and biodiversity', encompassing habitats and species ranging from internationally important wildlife sites (such as designated sites including Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites), through national (Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR)) and locally (Local Nature Reserves (LNR)) designated sites and non-designated sites (Local Wildlife Sites (LWS), Sites of Importance for Nature Conservation (SINC) and Sites of Nature Conservation Interest (SNCI)) for habitats and species, to species level considerations for species afforded higher levels of conservation protections ('Protected species' – of which there are varying levels of protection) or where a site may be of utmost importance to that species' continued existence.
- 5.1.3 As part of the biodiversity assessment, the Applicant is required to consider biodiversity by first establishing a biodiversity baseline before designing a Project appropriately to avoid, reduce, mitigate and compensate for any potential impacts it may have on biodiversity, in-line with legislation. To evidence this process a desk-based assessment, and a suite of field surveys is required, before consideration is given to Project design.
- 5.1.4 The biodiversity assessment will quantify potential impacts on important ecological features identified within the Site, and those outside of the Site that have the potential to be impacted by the Project, taking account of all embedded mitigation and all design information available.
- 5.1.5 In preparing the biodiversity assessment in this PEI, consultation has been undertaken throughout the process, with iterative feedback to the Project design team to reduce potential impacts, and this will continue to Environmental Statement (ES) stage.

5.2 Key Terms

Table 5-1: Key Terms

Term	Definition
Designated Site	Refers to a specific location that has been officially recognised for a particular purpose such as its importance to nature conservation interests. Designated sites can be statutorily or non-statutorily designated and are recognised on varying geographic levels from internationally important sites including SPA, SAC, Ramsar and Marine Protected Areas, through nationally important sites including (NNR) and Sites of Special Scientific Interest (SSSI) to local sites including Local Nature Reserves (LNR). Non-statutorily designated sites include Local Wildlife Sites (LWS), Sites of Importance to Nature Conservation (SINC) and Sites of Nature Conservation Interest (SNCI).
Designated feature	Refers to a characteristic feature of a designated site such as an important assemblage of non-breeding birds, which has been used as a reason for the site’s notification. Designated features are often used to measure a site’s ongoing condition.
Habitat	An area of land, with recognisable characteristics allowing categorisation using recognised criteria such as UK Habitat Classification (UKHab).
Protected species	Species afforded additional protection through domestic legislation or regulation including the Wildlife and Countryside Act 1981 (as amended); The Natural Environment and Rural Communities (NERC) Act (2006) and the Conservation of Habitats and Species Regulations (2017).
Zone of influence	The area over which effects on ecological features of the development could be realised.
Important ecological feature	Set out within CIEEM guidance ⁴ , relevant important ecological features include: Designated Sites – Ramsar sites, SPA, SAC, SSSI, Marine Conservation Zones, NNR and LNR. National Biodiversity Lists Habitats and species of principal importance (HPI / SPI) for the conservation of biodiversity, Ancient Woodland Inventories (AWI).Biodiversity Action Plan lists – Local Biodiversity Action Plan (BAP) priority species and habitats. Red Listed, Rare, Legally Protected Species - Species of conservation concern, Red Data Book (RDB) species, Birds of Conservation Concern

⁴Guidelines for Ecological Impact Assessment in the UK and Ireland – Terrestrial, Freshwater, Coastal and Marine CIEEM V1.3 updated September 2024: [EclA-Guidelines-v1.3-Sept-2024.pdf](#)

Term	Definition
	(BoCC), Nationally rare and nationally scarce species, legally protected species.
Significant effects	An effect that either supports or undermines biodiversity conservation objectives for ‘important ecological features’ or for biodiversity in general as defined by Chartered Institute of Ecology and Environmental Management (CIEEM) (2018, updated 2024) ⁵ .

5.3 Summary of Points Raised in EIA Scoping Opinion and Project Response

5.3.1 Comments provided by the Planning Inspectorate (PINS) relating to areas to be considered (scoped in) to the biodiversity assessment are summarised in Table 5-2.

Table 5-2: PINS Scoping Opinion on Biodiversity

Summary of PINS Scoping Opinion	Discipline Feedback	Next Steps
Concerns about plant and traffic emissions to designated and non-designated sites during construction.	At this stage, we do not have sufficient information to scope this potential impact pathway. The ES will include further information about emissions during construction, with details of construction traffic management and construction schedules, allowing assessment to be made.	Emissions from plant and construction traffic will be assessed within the ES Chapter, as part of the next stage of the Project.
Concerns about Electro-Magnetic field (EMF) and potential heating impacts from cable causing disturbance to species during operation.	At this stage, we do not have sufficient information to scope this potential impact pathway i.e. engineering information pertaining to cable routes, depths, cable specifications and cable housing is not yet available. The ES will include further	Potential impacts from EMF and temperature change will be assessed within the ES Chapter, as part of the next stage of the Project.

Summary of PINS Scoping Opinion	Discipline Feedback	Next Steps
	<p>information about design, including cable type, cable housing, cable depth and locations. EMF and temperature will be considered once this information is available.</p>	
<p>Additional information was requested around the survey scope and approach to protected species assessment for hazel dormouse, white-clawed crayfish and reptiles. Assurance that sufficient survey has been undertaken will be required within the ES.</p>	<p>The ES will include a scoping table with justifications of survey scope, with information about approach to assessment and embedded measures also available at that stage. Formal letter exchange will take place with Natural England (relevant stakeholder) to agree survey methodologies and ensure an appropriate scope of assessment.</p>	<p>The survey scope will be agreed with Natural England via the Discretionary Advice Service (DAS) and with a SoCG or formal letter exchange. This information will be appended to the ES, as part of the next stage of the Project.</p>
<p>Functionally linked land and the assessment of designated sites.</p>	<p>Functionally linked land will be assessed at part of the Habitats Regulations Assessment (HRA) in line with the Conservation of Habitats and Species Regulations 2017.</p>	<p>A shadow Habitats Regulations screening Assessment has been prepared and was issued to stakeholders for comment. Natural England provided useful comments on this document and updates were made accordingly. The HRA will be progressed concurrently with the ES and will be available as part of the DCO application.</p>
<p>Assessment of air quality impacts on biodiversity.</p>	<p>Once a design has been finalised and factors potentially impacting air quality (construction traffic) can be quantified,</p>	<p>Potential impacts to air quality will be considered within the ES Chapter, as part of the next stage of the Project.</p>

Summary of PINS Scoping Opinion	Discipline Feedback	Next Steps
	<p>a scoping assessment will be made within the Ecological Impact Assessment (in the ES) to identify likely significant effects and potential receptors / important features. Following scoping, air quality impacts (changes to pollutant levels) will either be ‘scoped-out’ of further assessment or ‘scoped-in’ to impact assessment.</p>	

5.3.2 In addition to the PINS Scoping Opinion, engagement has been and continues to be undertaken with relevant stakeholders. Table 5-3 summarises the meetings held with relevant stakeholders.

Table 5-3: Summary of meetings held with relevant stakeholders

Date	Consultee	Summary
12/08/20 24	Royal Society for Protection of Birds (RSPB)	Introductory meeting with RSPB to discuss potential solar development in proximity to Dungeness.
19/08/20 25	Natural England (NE)	Introductory Discretionary Advice Service (DAS) meeting to discuss the Project and DAS agreement / objectives. DAS will be used to agree proportionate and appropriate approach to ecological impact assessment and habitats regulations assessment.
03/09/20 25	Environment Agency (EA)	Introductory meeting with the EA to discuss the Project and objectives of consultation. Consultation will be used to agree proportionate and appropriate approach to ecological impact assessment and habitats regulations assessment.
10/09/20 25	RSPB	Project presentation to RSPB showing the current Site boundary and working parameters. Run through of ecological surveys and findings to date, and proposed scope of assessment. Discussions regarding

Date	Consultee	Summary
		<p>RSPB initial feedback with the Project and any local conservation opportunities the RSPB know of. Technical engagement regarding working within areas of vegetated shingle and any lessons learned from RSPB in this area. Agreed approach for further meetings to discuss scheme and opportunities.</p>
08/10/2025	Little Cheyne Court Windfarm	<p>Introductory meeting to discuss the Little Cheyne Court (LCC) scheme and their landholding, technical ecological findings and lessons learned during their application process, post-works monitoring and on-going monitoring programmes that are underway within the LCC holding. This meeting also served as a chance to share South Brooks approach and direction of travel, including proposed mitigation offerings which offer collaboration opportunities between the projects to deliver landscape scale enhancements.</p>
28/10/2025	Environment Agency	<p>Second meeting with the EA and an introduction to technical specialists at the EA. The purpose of the meeting was to clarify the EA's position within the consultation process, discuss technical questions sent to the EA prior to the meeting, and agree on survey approaches going forward – specifically River Condition Assessment (RCA) approach and the extent of survey. EA confirmed that RCA is to be undertaken on named watercourses only (at this Site).</p>
30/10/2025	Natural England	<p>Meeting to discuss NE issued comments on early shared biodiversity work (Habitats Regulations Assessment). Discussion held on updates from ecology surveys and wider consultation.</p>
20/11/2025	Kent Wildlife Trust	<p>Overview of work completed to date re. Biodiversity Discussion on whether the KWT have any conservation priorities to which we can possibly contribute towards - to be advised further by KWT.</p>

Date	Consultee	Summary
25/02/20 26	EDF Energy	Meeting with EDF Ecologist to share Project aims and discuss working within the Dungeness landscape.
26/02/20 26	Natural England	Brief discussion on updates since last engagement. Discussion on HRA screening report updates following NE comments.
10/03/20 26	RSPB	Update meeting to share Phase Two masterplan and discuss conservation opportunities (RSPB led projects) and survey access.
17/03/20 26	Environment Agency	Discussion with EA about the level of survey required to assess fish and EMF on European eel. Confirmation that a fish habitat survey is to be undertaken however tightly scoped fish surveys may only be undertaken at crossing locations, should they be deemed necessary i.e. there is potential for impacts to migratory fish.

5.3.3 A summary of comments received during consultation and engagement with consultees in relation to biodiversity is provided in Table 5-4.

Table 5-4: Summary of Ongoing Comments and Feedback with consultees

Summary of Relevant Stakeholder Consultation Comments	Consultee	Discipline Feedback	Next Steps
<p>Potential for direct and indirect impacts on designated sites from the Project via habitat loss / degradation. Potential impacts on functionally linked land will need to be assessed.</p>	<p>Natural England</p>	<p>The Project has been designed away from direct impacts on designated sites as far as practicable however the Project retains optionality surrounding cabling routing at this stage. Commitments have been made to avoid overground infrastructure (save for access) including solar, substation infrastructure, overhead lines or BESS infrastructure within designated sites (SPA / SAC / Ramsar / SSSI). Functionally linked land will be assessed at part of the Habitats Regulations Assessment (HRA) in line with the Conservation of Habitats and Species Regulations 2017.</p>	<p>Work is continuing to find the best available cable route(s) and working methods to be used within designated areas to reduce environmental impacts. The Applicant is engaged with local consultees including RSPB, KWT and RWE on behalf of Little Cheyne Court Windfarm to understand lessons learned from working within the Dungeness peninsular. The Applicant / Project are also engaged with stakeholders (NE and the EA) to identify best available working options for cable routes and the grid connection. Final design will be assessed within the ES Chapter, at the next stage of the Project.</p>
<p>The Project should retain existing ecological features such as hedgerows, ditches, ponds, scrub, trees and arable weeds. It is recommended that wide species rich</p>	<p>Kent Wildlife Trust</p>	<p>Noted and agreed. The Project has been designed away from ecological constraints where practicable with proposals to retain and enhance existing</p>	<p>Embedded measures will be fixed as part of the design assessed for ES. The Project will continue to engage with KWT throughout the Project lifecycle, further information</p>

Summary of Relevant Stakeholder Consultation Comments	Consultee	Discipline Feedback	Next Steps
<p>buffers are provided around these features as well as around the margins of the entire site. These margins should provide a number of key plant species, preferably of local provenance which are suited to local growing conditions and which target pollinator communities.</p>		<p>ecological features for betterment. The Project will continually engage with KWT (and other relevant stakeholders) to ensure the embedded measures and proposed management of the Site has wide ranging benefits.</p>	<p>and proposed management plans will be available within the ES Chapter, as part of the next stage of the Project.</p>
<p>Comment on survey scope to include Fish Habitat Survey as part of the assessment.</p>	<p>Environment Agency</p>	<p>Fish habitat survey added to survey scope, with surveys to be undertaken in summer 2026. Following surveys, fish habitat will either be 'scoped-out' of further assessment or 'scoped-in' to impact assessment.</p>	<p>Fish habitat as a potential important ecological feature will be considered as part of the ES, once results from survey is available and additional design information is fixed.</p>
<p>Consideration should be given to the location of the battery storage, with consideration of fire and contamination risks and impacts on sensitive environmental receptors.</p>	<p>Brighton and Hove Council</p>	<p>The Project retains optionality at this Stage, though potential environmental and health impacts have been considered within the design / engineering parameters. The location of substation and associated BESS will not be within 300m of any dwellings, ensuring that if there were a fire or contamination event, wider impacts will be</p>	<p>Embedded measures and proposed impacts will be identified and discussed within the ES Chapter, at the next stage of the Project.</p>

Summary of Relevant Stakeholder Consultation Comments	Consultee	Discipline Feedback	Next Steps
		<p>reduced. In the unlikely event that the BESS combusts, it will be designed to burn itself out, without the use of firewater, avoiding excess water needs and reducing potential run-off issues. Further, the BESS will be designed to retain any potential contaminants onsite, to avoid environmental pollution via runoff. The Project has been designed away from potential constraints as far as practicable, with potentially sensitive ecological receptors first avoided where possible, with any remaining impacts then reduced or mitigated. A commitment has been made for no overground infrastructure within designated areas, with embedded measures also secured to remove potential impact pathways.</p>	
<p>Landscaping will be required to consider wayleaves and operational</p>	<p>National Grid</p>	<p>Noted – the Project will work with local stakeholders to ensure the Project’s landscaping plans are</p>	<p>Progress the Project masterplan / outline Landscape and Ecological Management Plan (oLEMP) with</p>

Summary of Relevant Stakeholder Consultation Comments	Consultee	Discipline Feedback	Next Steps
<p>safety beneath existing infrastructure.</p>		<p>appropriate to deliver biodiversity gain / species mitigations, without impacts to other users.</p>	<p>consideration for wayleaves and operational safety surrounding existing electrical infrastructure.</p>
<p>This development proposal is not located within the offshore area, does not have any potential offshore nature conservation issues and is not concerned with nature conservation at a UK-level, therefore JNCC does not have any comments to make on the consultation.</p>	<p>Joint Nature Conservation Committee</p>	<p>Noted</p>	<p>Resolved</p>
<p>CPRE raised a number of points as summarised below: BNG should be achieved within the Site. Consideration should be given to the nearby designated sites, and potentially functionally linked habitats present outside of designated site boundaries that may be impacted by the Project. The general character of the area should be maintained and protected species that are likely to utilise the Site will require assessment.</p>	<p>Campaign to Protect Rural England (CPRE)</p>	<p>There will be an overall BNG in excess of the 10% mandate resultant from the Project, and this will be fully quantified as part of the DCO application. Functionally linked land associated with the nearby internationally designated sites (Dungeness, Romney Marsh and Rye Bay SPA and Ramsar, and Dungeness SAC) will be considered within the HRA. Embedded measures have been outlined that will include suitable buffers to retained habitat</p>	<p>The HRA will consider potential impacts on the internationally designated sites and FLL outside of the designated areas. Embedded measures and proposed impacts will be identified and discussed within the ES Chapter, at the next stage of the Project.</p>

Summary of Relevant Stakeholder Consultation Comments	Consultee	Discipline Feedback	Next Steps
<p>There are concerns about man-made features reducing the Site’s suitability to support protected species.</p>		<p>features, with betterment of features where practicable. Potential impacts on important ecological features will be assessed within the ES.</p>	
<p>Local Knowledge indicates that large areas of land within area of the Project may be recognised as Functionally Linked Land (FLL) to the nearby designated sites. An assessment should be made detailing the findings of survey and assessment of FLL.</p>	<p>Community</p>	<p>Surveys have been taking place since November 2023 to ascertain the use of the Site by species, including wintering bird species recognised as qualifying features of designated sites, or notified as important ecological features (See Table 5-1). The Project has been designed away from major constraints including avoiding designated sites, with further commitments reducing potential works within the SSSI (such as that to commit to no overground infrastructure within the SSSI). Areas identified through survey work as being important for species are being prioritised as mitigation land, to reduce potential impacts and provide embedded measures to</p>	<p>Appropriate survey work will be undertaken as agreed with relevant stakeholders (NE and the EA). The Project has been and will continue to be designed away from potential impacts as far as practicable, with reduction, mitigation and compensation considered thereafter. Details for the assessment of FLL will be available within the HRA assessment that will be submitted alongside the ES Chapter. Impacts to potentially important ecological features will be assessed within the ES Chapter, at the next stage of the Project.</p>

Summary of Relevant Stakeholder Consultation Comments	Consultee	Discipline Feedback	Next Steps
		<p>improve habitats present. The Habitats Regulations Assessment will consider the use of FLL and the ES will consider the impacts to important ecological features.</p>	
<p>While biodiversity is scoped in, the current approach to baseline surveys, valuation and Habitats Regulations Assessment (HRA) remains incomplete and lacks the transparency and specificity required for such a sensitive location close to internationally designated sites and Functionally Linked Land (FLL).</p>	<p>Community</p>	<p>A HRA Screening Assessment (Stage One) has been produced and shared with relevant stakeholders to ensure the scope of the assessment is correct. Natural England provided technical comments and the HRA has been updated as appropriate. Stage Two of the HRA will be undertaken once survey work is concluded and further design information is available.</p>	<p>A HRA Report will be provided alongside the ES Chapter, at the next stage of the Project.</p>
<p>Community groups do not believe that the Project can replace the biodiversity it will destroy to construct the scheme, and then increase it again from the baseline up to a 10% minimum BNG for many decades.</p>	<p>Community</p>	<p>A biodiversity net gain assessment will be provided as part of the ES. BNG has been considered from project inception with large amounts of land currently retained to provide optionality for the delivery of</p>	<p>A BNG assessment will be provided alongside the ES Chapter, at the next stage of the Project.</p>

Summary of Relevant Stakeholder Consultation Comments	Consultee	Discipline Feedback	Next Steps
<p>We request that existing habitats and biodiversity are 100% maintained as they currently are and ecological enhancements are integrated and added into existing biodiversity, rather than replacing it.</p>		<p>ecological habitats. The Project is currently engaged with several local stakeholders to identify local conservation interests and projects to enable a collaborative approach to landscape scale biodiversity gain.</p>	

5.3.4 **Appendix 1-2: Key Policy and Legislation** provides further details on the legislation, policy and guidance that has informed the approach to the biodiversity assessment.

5.4 Ongoing Biodiversity Work

Study Area

5.4.1 The Study Area for the Project has been set based on the maximum extent of the potential Zone of Influence (Zoi); an area over which effects on ecological features of development could be realised. The Study Area varies for different ecological receptors, depending on their sensitivity to environmental change. Study Areas adopted are defined in Table 5-4 (with legally designated sites presented in **Figure 5-1: Legally designated sites within the Study Area**) and have been determined using best practice guidance (issued by the CIEEM⁶), professional judgement and a high-level desk-based assessment of the type of ecological features present, or potentially present.

Table 5-4: Ecological Features

Ecological Feature	Study Area
Internationally designated Sites (SPA / SAC/ Ramsar)	Site, plus a 10km buffer
Special Areas of Conservation (SAC) for which bats are the primary reason for designation	Site, plus a 30km buffer
Nationally designated Sites (SSSI / NNR)	Site, plus a 5km buffer
Locally designated sites (LNR)	Site, plus a 2km buffer
Non-statutory designated sites (LWS / SINC/ SINC)	Site, plus a 2km buffer

⁶ Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine. Version 1.3 updated September 2024. Chartered Institute of Ecology and Environmental Management.

Ecological Feature	Study Area
Habitats of Principal Importance (HPI) / Ancient Woodland	Site, plus a 1km buffer
Legally protected and notable species – birds and bats	Site, plus a 5km buffer
Legally protected and notable species – invertebrates, badgers, water vole, otter and all others	Site, plus a 2km buffer
Legally controlled species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended)	Site, plus a 2km buffer
Waterbodies (ponds, wet ditches, lakes and watercourses)	Site, plus a 0.5km buffer
Veteran trees	Site, plus a 0.5km buffer

5.4.2 The Study Area will be reviewed and amended in response to design refinement and consultation feedback, ensuring there is sufficient data available to conduct the assessment.

Collection of Biodiversity Data

5.4.3 Establishing the biodiversity baseline within the study area requires reference to existing data sources (biodiversity record centres and local groups), consultation with relevant stakeholders (including statutory bodies: Natural England and the Environment Agency), and field survey data.

Desk study

5.4.4 The following sources have been used to inform the assessment:

- Multi-agency Government Information for the Countryside (MAGIC) website⁷
- Joint Nature Conservation Committee (JNCC) website⁸
- KWT website⁹
- Kent and Medway Biological Record Centre (KMBRC)¹⁰
- Sussex Biological Record Centre (SXBRC)¹¹
- Woodland Trust's Ancient Tree Inventory (ATI) for ancient and veteran trees¹²
- Ordnance Survey (OS) online mapping¹³

Field survey

5.4.5 A range of ecology surveys have been completed, are ongoing or are planned for the Site. Specific survey areas for these surveys are the Site boundary unless otherwise specified. Survey areas may be larger than the Site boundary, to account for potential buffer zones and / or overlapping habitats but are not reduced within the Site boundary. Surveys are:

- Extended UK Habitat Classification Survey (began 2024, ongoing);
- Habitat condition assessment (began 2024, ongoing);
- River condition assessment (planned);
- Breeding bird survey (completed between April and July 2025);
- Non-breeding bird survey (began 2023, ongoing);
- Passage bird survey (began 2025, ongoing);
- Bat survey (completed between April and October 2025);
- Invertebrate scoping survey (completed July 2025);
- Badger survey (began 2024, ongoing);

⁷ <https://magic.defra.gov.uk/>

⁸ [Advisor to Government on Nature Conservation | JNCC](#)

⁹ [Local Wildlife Sites | Kent Wildlife Trust](#)

¹⁰ [Home | Kent & Medway Biological Record Centre](#)

¹¹ [Sussex Biodiversity Record Centre](#)

¹² [Ancient Tree Inventory - Woodland Trust](#)

¹³ [OS Maps | Explore the Outdoors with Britain's Most Detailed Mapping](#)

- Riparian mammal survey (otter and water vole) (began 2024, ongoing) will extend up to 200m outside of the Site boundary along watercourses to search for otter holts;
- Great crested newt survey (planned) will include waterbodies outside of the Site boundary within 500m, where access is available;
- Macrophyte survey and aquatic invertebrate survey (planned); and
- Fish habitat survey (planned).

5.4.6 Survey coverage to date is shown within **Figure 5-2: Biodiversity survey coverage to date (May 2026)**.

5.4.7 The type and general scope of these surveys was discussed with relevant stakeholders (Natural England and the Environment Agency) to ensure the level of survey was appropriate for the type of project proposed. Further details of the survey scope are available within **Appendix 5.1 – Biodiversity Survey Methodologies1**.

5.4.8 The results from ecology surveys, along with those from other technical disciplines will inform the continued consideration of biodiversity as the Project design evolves. This approach to iterative feedback has secured embedded measure into the design from an early stage.

Biodiversity net gain

5.4.9 From November 2026 it will be mandatory for Nationally Significant Infrastructure Project (NSIP) delivered via the DCO process to demonstrate a quantifiable biodiversity net gain (BNG) of at least 10% under the Environment Act 2021. The submitted DCO application will demonstrate BNG using the Department for the Environment Food and Rural Affairs (DEFRA) Biodiversity Metric Calculator to provide evidence of an achievable BNG associated with the Project.

Current results

Desk study

5.4.10 There are three internationally designated sites within 10km of the Site boundary: Dungeness, Romney Marsh and Rye Bay SPA and Ramsar, and Dungeness SAC. These designated sites, varying in extent, show considerable geographic overlap within the zone of influence (See **Figures 5-3 to Figure 5-7**).

5.4.11 Dungeness, Romney Marsh and Rye Bay SPA is notified for important bird populations, with qualifying features recognised in winter (Bewick's swan, bittern, hen harrier, golden plover, ruff, shoveler and overall waterbird assemblage),

passage (aquatic warbler), and breeding season (marsh harrier, avocet, Mediterranean gull, sandwich tern, common tern and little tern).

- 5.4.12 Dungeness, Romney Bay and Rye Bay Ramsar qualifies due to the presence of important habitats (annual vegetation on drift lines and the coastal fringes of perennial vegetation on stony banks, and natural shingle wetlands), support to threatened ecological communities including bryophytes, vascular plants and invertebrates, with extended recognition due to the presence of vulnerable, endangered or critically endangered species¹⁴ and important wintering bird populations (overall waterbird assemblage, mute swan and shoveler).
- 5.4.13 Dungeness SAC is designated for the presence and extent of habitats listed in Annex I and importance for species listed in Annex II of the Habitats Directive¹⁵. Important habitats include annual vegetation on drift lines and perennial vegetation of stony banks. The Annex II species which is a primary reason for designation is great crested newt.
- 5.4.14 There are no SACs for which bats are the primary reason for designation within 30km of the Site boundary.
- 5.4.15 There are three nationally designated sites of importance to biodiversity within 5km of the Site boundary including two SSSIs and one NNR: Rye Harbour SSSI; Dungeness, Romney Marsh and Rye Bay SSSI; and Dungeness NNR.
- 5.4.16 Rye Harbour SSSI is notified as a large and ecologically complex site of considerable biological and geological importance. It has the only extensive tract of shingle in East Sussex. The site also contains areas of alluvial grazing marsh, saltmarsh, and intertidal sands and muds. The diversity and rarity of habitats present at Rye Harbour account for the extremely rich flora and fauna, the site supports nationally important communities of plants, birds and invertebrates.
- 5.4.17 Dungeness, Romney Marsh and Rye Bay SSSI is notified as a nationally important site by reason of a diverse range of biological and geological features, specifically the coastal geomorphology of Dungeness and Rye Harbour and nationally important habitats: saltmarsh, sand dunes, vegetated shingle, saline lagoons, standing waters, lowland ditch systems, and basin fens. The SSSI supports nationally important species interests with populations of four vascular plant species listed in Schedule 8 of the Wildlife and Countryside Act 1981 (as amended);

¹⁴ including: Greater water-parsnip *Sium latifolium*, warne's thread-moss *Bryum warneum*, Water vole *Arvicola amphibius*, Aquatic warbler *Acrocephalus paludicolam*, Great crested newt *Triturus cristatus*, Medicinal leech *Hirudo medicinalis*, the ground beetle *Omophron limbatum*, Marsh mallow moth *Hydraecia osseola hucherardi*, and De Folin's lagoon snail *Caecum amoricum*

¹⁵ The Habitats Directive (Council Directive 92/43/EEC). Available at:

https://environment.ec.europa.eu/topics/nature-and-biodiversity/habitats-directive_en

populations of the vulnerable Warne's thread-moss; water voles; assemblages of breeding and non-breeding birds associated with habitats present; metapopulations of great crested newts; endemic species and subspecies of invertebrates; populations of invertebrate species listed in Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) or species listed as endangered, vulnerable and rare.

- 5.4.18 Dungeness NNR is designated as one of the largest shingle landscapes in the world. With main habitats noted as coastal, lowland grassland and maritime. It is noted to have over 600 species of plants recorded.
- 5.4.19 There are no LNRs within 2km of the Site.
- 5.4.20 There are three LWS within 2km of the Site: Camber Sands noted for its dune systems including open dune, fixed dune grassland and dune scrub. Midley Chapel Pasture, Hawthorn corner LWS – a neutral grassland with dykes and hedges present; and Lydd common and pastures LWS – a locally rare grassland type comprising many acidic species on sandy-soiled grassland which has developed on blown sand over old shingle ridges.
- 5.4.21 There is one Roadside Nature Reserve (RNR) - FH07 Tournay Road. This RNR has been designated because it has a mosaic of uncommon shingle plants and others typical of sandy soils.

Habitats

- 5.4.22 There are no ancient woodlands or ancient or veteran trees within the Study Area.
- 5.4.23 Within the Study Area there are several parcels of six priority habitats, as defined by the Priority Habitat Inventory (PHI), with Coastal and Floodplain Grazing Marsh (CFPGM) (large parcels of arable land), Coastal vegetated shingle (large areas between the Site and the coastline), Deciduous woodland (12 parcels associated with farmsteads and small semi-natural or plantation woodlands), Reedbed (ten parcels identified as main habitat, with reed fringes also occurring within ditches off-site), Ponds (three) and Traditional Orchard (three) occurring. It is noted that many of the priority habitats identified on the PHI do not appear to align with their priority habitat descriptions, with much of the CFPGM drained and used for cereal crop production and areas of traditional orchard appearing to have long since been removed (aerial imagery suggesting orchards present in the 1960's were felled and reverted to fields / gardens prior to 1990). Within the Site there is a single parcel of CFPGM. However, this parcel does not match the UK Biodiversity Action Plan (UK BAP) Priority Habitat Description¹⁶ for Coastal Floodplain Grazing Marsh as a

¹⁶ JNCC Habitat Description - CFGM. <https://data.jncc.gov.uk/data/82b0af67-d19a-4a89-b987-9dba73be1272/UKBAP-BAPHabitats-07-CoastFloodGrazingMarsh.pdf>

review of time-lapse aerial imagery suggests the area has been used for crop production for more than 20 years.

- 5.4.24 All priority habitats identified on the PHI within the Study Area are shown on **Figure 5-8: Priority habitats within the Study Area (Priority Habitats Inventory)**. The cable route options for the Project potentially cross areas of coastal vegetated shingle, amongst other habitats, within the designated sites at Dungeness SAC and Dungeness, Romney Marsh and Rye Bay SPA/ Ramsar.
- 5.4.25 In addition to the habitats recorded on the Priority Habitat Inventory, hedgerows recorded during the field survey qualify as HPI in England.
- 5.4.26 There are 31 waterbodies within the Study Area, of which two are located within the Site (P4 and P6). Waterbodies and ditches holding water within the Site and the 500m Study Area are presented in **Figure 5-9: Waterbodies and ditches within 250m of the Site**.

Field survey

- 5.4.27 The Site covers approximately 1,208ha, of which approximately 979.64ha has been incorporated into a UK Habitats Classification (UKHab) and condition assessment. Additional UKHab surveys will be undertaken along proposed cable routes, full condition assessment survey will be undertaken on the chosen cable route. The watercourse network within the Site (and where crossing of watercourses occur along the cable route) will also be subject to full condition assessment, using both UKHab and River Condition Assessment (RCA) methodology, as required.
- 5.4.28 The Site supports a range of habitats, although it is dominated by arable fields, with a mix of cereal crops and grass cultivars that make up most of the area. Field margins, though distinct, vary throughout the Site boundary with wide margins in the South Brooks A area, and narrower margins elsewhere. Margins are dominated by modified grassland with a proportion made up of other neutral grassland.
- 5.4.29 There are few hedgerows within the Site boundary, with the majority being defunct examples of species poor hedgerows, in poor condition. The dominant species within the hedgerows is hawthorn.
- 5.4.30 A network of watercourses cross the Site boundary including ditches, drains and large lotic sewers, which are shown on the Statutory Main River Map¹⁷. Many of these watercourses are noted for their aquatic vegetation (macrophyte assemblages) and provide suitable habitat for water vole, with confirmed presence

¹⁷ Main River Map - <https://www.arcgis.com/apps/webappviewer/index.html?id=17cd53dfc524433980cc333726a56386>

within the Site boundary. The watercourse network is widely connected throughout the Site including to designated sites nearby.

- 5.4.31 There is a small, isolated woodland copse within the Site boundary that abuts the farmstead at Scotney Court Farm. The woodland’s origin appears to be as planted treelines along a watercourse which have grown out and produced additional self-set standards. The woodland comprises a mix of broadleaved species and is considered of limited importance to conservation.
- 5.4.32 Small, scattered parcels of scrub are located within field margins or as bankside vegetation adjacent to ditch networks, with mixed scrub, bramble scrub, willow scrub and hawthorn scrub present.
- 5.4.33 Several ponds, both temporary and permanent, have been identified within and adjacent to the Site boundary.
- 5.4.34 A summary of habitats recorded as a result of field survey are presented in Table 5-5 below.

Table 5-5: Summary of Habitats identified in the study area

UKHabs	Area in hectares (Ha)	Condition
Aquatic marginal vegetation	0.07	Assessed as part of the ditch systems in which they sit – narrow bordering aquatic marginal vegetation within the watercourses (ditches) on the Site. Condition assessment not applicable.
Arable field margins	0.07	Considered in-line with arable. Condition not applicable
Artificial unvegetated unsealed surface	2.05	Field access tracks and farm tracks within the Site and areas surrounding buildings. Condition not applicable.
Bramble scrub	0.03	Bramble scrub in field margin – poor condition (pre-assigned).
Cereal crops	611.9	Collections of large fields within the Site,

UKHabs	Area in hectares (Ha)	Condition
		characterised as open and very flat fields with few vegetated boundary features. Many field boundaries are made up of grass strip, field drains or ditches. Condition assessment not applicable.
Developed land – sealed surface	3.9	Developed land within the Site, typically roads and trackways but also includes some farm buildings and associated infrastructure. Condition assessment not applicable.
Hawthorn scrub	0.08	Small parcels of hawthorn dominant scrub within field boundaries / headlands. Condition poor due to scale of habitat parcels.
Mixed scrub	2.42	Mixed scrub parcels largely made up of small parcels of scrub that have grown out from field boundary features. Growth is typically slow and stunted, with main species present including hawthorn, blackthorn and gorse. Condition poor due to scale and characteristics of habitat (adjacent to disturbed areas with no surrounding vegetation).
Modified grassland	40.1	Largely field boundaries or permanent pasture that has been sown for livestock rearing and left to grow out. Much of this habitat is in poor condition with uniform short sward and species paucity. In isolated areas, species richness may

UKHabs	Area in hectares (Ha)	Condition
		<p>indicate moderate condition, however those habitats are more likely to be considered against other neutral grassland criteria due to their botanical interest and importance to invertebrates.</p>
<p>Non-cereal crops and temporary grass and clover leys</p>	<p>301.24</p>	<p>Field layouts are similar to those used for cereal crop, with large flat fields bounded by ditches, drains and occasional hedgerows / tree lines. Most non-cereal crop appears to be potato production, with other root vegetables also produced in smaller quantities. Grass and clover leys appear to be used for silage production. Condition assessment not applicable.</p>
<p>Other broadleaved woodland</p>	<p>0.87</p>	<p>Small parcels of plantation or semi-natural broadleaved woodland associated with farmsteads or grown out from linear features within field margins. Atypical woodland structures, more aligned with scrub structure however tree species and growth height reflects woodland. Poor condition due to lack of structure, age and species diversity, scale and overall structure.</p>
<p>Other neutral grassland</p>	<p>14.01</p>	<p>Other neutral grassland occurs within the Site predominantly within field margins / adjacent to access tracks and roads. Species diversity is</p>

UKHabs	Area in hectares (Ha)	Condition
		<p>variable, with some areas showing botanical richness and good invertebrate forage (particularly within the east of the Site). Sward height varies with some grassland becoming rank with others receiving a single grade cut once or twice annually. Moderate condition overall (as essential criteria A 'species richness' is likely passed within the majority of the field margins) however sward variability within the parcels and other characteristics are often uniform due to deleterious management.</p>
Ponds	0.02	<p>Small waterbody within the Site associated with arable land. Poor condition due to scale and surrounds of ponds.</p>
Reedbeds	0.33	<p>Small reed fringes / margins on ditch / water course networks. Many fringes are smaller than minimum mappable unit (25m²) so are not directly captured however where larger parcels are present these are considered as a standalone habitat. Poor condition due to scale of habitats within the Site, unable to meet the characteristic requirements for moderate or good condition.</p>

UKHabs	Area in hectares (Ha)	Condition
Reservoirs	1.13	Man-made reservoirs for the purposes of agricultural irrigation. Poor condition.
Wild bird mix	4.49	Wild bird mix sown in as conservation headlands and field margins within arable land. There was a single field sown entirely with cover crop/ wild bird mix. Condition assessment not applicable.
Willow scrub	0.18	Five small stands of willow scrub associated with watercourses within the Site. All are in poor condition due to scale and adjacent land uses (agricultural).

Bats

- 5.4.35 The site covers ~980ha of predominantly agricultural land, interspersed with hedgerows, drainage ditches, field margins and small areas of woodland and trees. These landscape features have potential to support bat foraging and commuting activity. There have been no potential roosting features identified within the Site.
- 5.4.36 The assessment combined a desk study, static acoustic monitoring, and night-time walkover transect surveys conducted seasonally during the active bat season (April–October 2025).
- 5.4.37 The desk study identified 8055 non-roosting records and 3608 roosting records of bats within the Survey area within the last 10 years, involving a minimum of eight species. There were non-roosting records of Daubenton’s bat, noctule, soprano pipistrelle and Nathusius’ pipistrelle within the Site. There are no records of roosting bats within the Site. There are records of five European Protected Species Mitigation Licences (EPSML) within the Study Area. The closest EPSML licenses are 2016-25034-EPS-MIT-1, 2016-25034-EPS-MIT and 2016-25034-EPS-MIT-2 that lie 0.83km south of the Site, all permitting the destruction of Nathusius’ pipistrelle resting places in 2021, 2021 and 2016 respectively.
- 5.4.38 Field survey included four bat activity transects and the deployment of two static acoustic monitors per transect once per season in spring (April), summer (August)

and autumn (October) to observe bat behaviour and movement across the Site and landscape.

The surveys confirmed the presence of a diverse assemblage of bat species typical of lowland agricultural landscapes in southeast England. A minimum of eight species or species groups were recorded during monitoring including common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle, *Myotis* species, noctule, brown long eared bat, Leisler's bat and serotine.

- 5.4.39 Bat activity occurred across the entire Site and throughout the survey period, with the highest activity levels recorded in summer. Common and soprano pipistrelles were the most frequently recorded bats, with 47.12% and 35.05% of recorded passes, respectively during the static monitoring surveys, a trend that was reflected during the transect surveys. Nathusius' pipistrelle accounted for approximately 11.9% of the total activity recorded during the static acoustic monitoring surveys. Bat activity was strongly associated with linear landscape features such as hedgerows, drainage channels and treelines which provide key foraging habitats and commuting routes, although bats were also observed to fly across open arable fields where no linear features were present.

The bat assemblage recorded is considered to be of local ecological importance, functioning primarily as a foraging and movement corridor within the wider landscape.

Badger

- 5.4.40 The desk study identified two records of badger within the Study Area in the last decade; the grid reference provided for both records is 0.9km outside of the Site. To ensure legal compliance, exact locations of badger records have not been divulged.
- 5.4.41 Evidence of badger occupancy, including sett entrance holes, footprints and latrines, foraging signs and hairs were found throughout the Site. Though most records occurred within South Brooks A and C. In addition to known badger signs within the Site, there have been several records of road-killed badger outside of the Site, but within the Study Area.

Birds

- 5.4.42 The desk study identified over 29,000 records of 107 notable species¹⁸ within the Study Area in the last decade. Including 67 species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), 53 species listed on the Birds of

Conservation Concern (BoCC) Red List¹⁹, 26 species listed on the Birds of Conservation Concern Amber List and 14 species considered Species of Principal Importance (SPI).

5.4.43 The following Schedule 1 species were recorded and have the potential to breed within the Site, and therefore receive the additional protections afforded to Schedule 1 species: red kite, marsh harrier, hobby, peregrine, barn owl, quail, little ringed plover, Mediterranean gull, Cetti's warbler, and firecrest.

5.4.44 There were six records of species within the Site: barn owl, Bewick's swan, corn bunting, merlin, ruff and tree sparrow.

5.4.45 During breeding bird surveys undertaken in 2025, 88 species were recorded within the Study Area. Of those, 55 were considered to show territorial behaviour associated with potential breeding attempts, such as singing, display or courtship on two or more occasions, nest building or active (or recently active) nests being found, or birds carrying food or faecal sacks to/from an area.

5.4.46 Of species potentially nesting within the Site:

- Five are listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended): barn owl, Cetti's warbler, hobby, marsh harrier, and peregrine.
- 13 are BoCC Red-listed: Corn bunting, cuckoo, greenfinch, grey partridge, house sparrow, lapwing, linnet, mistle thrush, skylark, starling, tree sparrow, yellowhammer, and yellow wagtail.
- 14 are BoCC Amber-listed: Black-headed gull, dunnoek, kestrel, mallard, marsh harrier, reed bunting, rook, sedge warbler, song thrush, sparrowhawk, stock dove, whitethroat, woodpigeon, and wren.
- Wintering bird surveys have identified several fields within South Brooks A and E that support flocks of wintering wildfowl (mainly greylag geese) with smaller assemblages of lapwing and golden plover also observed. Waterbodies adjacent to South Brooks A appear to host the majority of wintering bird interest with large counts of wildfowl regularly having occurred between November 2023 (when survey began) and March 2026.
- Species recognised as features on the nearby SPA designation have been recorded on the Site during the winter period including: Bewick's swan, hen

¹⁹ Birds of Conservation Concern 5 - Stanbury, A.J., Eaton, M.A., Aebischer, N.J., Balmer, D., Brown, A.F., Douse, A., Lindley, P., McCulloch, N., Noble, D.G. & Win, I. 2021. The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. British Birds 114: 747.

harrier and golden plover; though the numbers occurring within the Site do not align with the designation thresholds, with peak counts of 28 Bewick's swan, 2900 golden plover, and one hen harrier. Overall waterbird assemblage features (ducks, geese and wading birds) have also been recorded.

- Small numbers of farmland birds have been observed throughout the Site, though preference has again been identified within South Brooks A, an area where wild bird mix had been sown, and where wider field margins are present. Farmland birds recorded in low numbers include yellowhammer, corn bunting, skylark, linnet, tree sparrow and reed bunting.

Great crested newt

- 5.4.47 The desk study returned no records of great crested newt (GCN) within the Study Area however there are nine historic European Protected Species licences from as recently as 2014 within the Study Area, with two records present within the Site. It is acknowledged that GCN are a feature on the nearby Dungeness SAC.
- 5.4.48 Arable habitats, which make up the bulk of the Site are sub-optimal for great crested newt in their terrestrial life phase, however wide arable margins and linear features offer some potential to support them. There are two waterbodies identified within the Site, and a further 29 identified outside of the Site (within 500m) that have the potential to support GCN. This is also >40km of watercourses crossing the Site, mainly as ditches and sewers which have some potential to support GCN.
- 5.4.49 Regardless of their habitat suitability index, all ponds within 500m of the Site, where access is available, will be sampled for GCN eDNA.

Otter

- 5.4.50 The desk study returned no records of otter within the Study Area. Field survey (Extended UK Habitat Classification Survey) to date has not identified any signs of otter presence within the Site. The Site provides suitable habitat for commuting and/or foraging otter, through the channels and ditches throughout the Site. The Site however has limited connectivity to wider habitats with no major rivers flowing through or within close proximity to the Site. No features suitable for holts were found on the Site, though areas suitable for couching are present.

Hazel dormouse

- 5.4.51 The desk study returned no records of dormouse within the Study Area. The Site does not provide suitable habitat for hazel dormouse, with any areas of hedgerow and scrub within the Site isolated and poor in quality. The Site is also isolated from wider habitats and does not provide suitable habitat connectivity to habitats that may support populations of dormouse. The Site is therefore considered of negligible value for dormouse.

Reptiles

- 5.4.52 The desk study returned one record of a single common lizard within the Study Area 0.4km north of the Site in 2015, and two records of grass snake the closest and most recent was 1.4km south of the Site in 2020.
- 5.4.53 Rough grassland with open areas and close to scattered scrub and riparian habitats are suitable to support common and widespread reptile species. Potentially suitable habitat is available across the Site, though often isolated by large swathes of arable land. The largest area of potentially suitable habitat within the Site is within the arable margins of South Brooks A.
- 5.4.54 No reptiles have been observed during survey work.

Water vole

- 5.4.55 The desk study returned one record of water vole within the Study Area, a record from within the Site in 2016. Potential water vole habitat (in this case wet agricultural ditches and sewers with marginal, emergent vegetation, 45-50° earth banks with a variety of vegetation providing forage and cover from predators) has been identified within the Site, with presence of water vole confirmed in South Brooks A.

Fish

- 5.4.56 The desk study returned no records of fish within the Study Area, a search of the Environment Agency's Fish Data Explorer tool²⁰ returned no fish monitoring points within the Study Area. There is connectivity within the watercourses on the Site and the nearest monitoring location, however the distance between the Site and the nearest available monitoring location is approximately 7.3km north of the Site at West of Arrowhead Bridge, following the watercourse channels. The monitoring location at Arrowhead Bridge returned four records of European eel from September 2016, the latest monitoring survey data (from August 2025) returned no records of European eel. Other species recorded in small numbers in both 2016 and 2025 at Arrowhead Bridge included common bream, perch, pike, roach, rudd and tench.
- 5.4.57 The watercourses within the Site have potential to support fish, and a fish habitat survey will be undertaken to assess suitability for migratory fish, including European eel. It is noted that water management within the Study Area and Site, will limit the potential for natural fish migration, with impasses such as sluice gates, present within the network.

²⁰ EA Fish Data Explorer - <https://environment.data.gov.uk/ecology/explorer/>

Notable species

- 5.4.58 The desk study returned no records of other notable species within the Study Area in the last 10 years, though six historic records of hedgehog were received, the most recent of which is from 2014.
- 5.4.59 The Site provides suitable habitat for hedgehog, though none were observed during survey work.
- 5.4.60 Two brown hare were recorded during UKHab surveys in July 2025.

Legally controlled species

- 5.4.61 The desk study returned 30 records of eight species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). A summary of records is available in Table 5-6.

Table 5-6: Summary of legally controlled species records within the Study Area

Species	Number of records	Nearest location
Nuttall’s waterweed	11	Within the Site
Three-cornered garlic	1	0.07km northeast
Giant hogweed	1	0.5km west
American mink	4	0.88km southeast
Water fern	1	0.89km southeast
Japanese rose	2	0.99km east
New Zealand pigmyweed	7	1.22km west
Canadian waterweed	1	1.57km southeast
Wall cotoneaster	2	1.66km southwest

5.5 Important Receptors Identified

- 5.5.1 **Figure 5-1: Legally designated sites within the Study Area** presents nearby sensitive receptors that could be affected by biodiversity impacts associated with the Project. These receptors include the habitats within designated sites at Dungeness SAC, Dungeness and Romney Marsh SPA and Ramsar sites, Dungeness, Romney Marsh and Rye Bay SSSI, and Dungeness NNR; and the species which depend upon them. Many of these designated sites overlap geographically.

- 5.5.2 Midley Chapel Pasture, Hawthorn corner LWS and Lydd common and pastures LWS also have the potential to be impacted by the Project.

Future Biodiversity

- 5.5.3 This section considers the likely changes to the current baseline that may occur in the absence of the Project over its proposed duration.
- 5.5.4 The Study Area within the Site and up to 50m is dominated by arable fields and sheep grazed grass pasture, mainly bounded by ditches, sewers and watercourses. There are few hedgerows within the landscape, with those that are present being low and often defunct. This is likely due to strong crosswinds resulting in difficult growing conditions. There are areas of vegetated shingle between the developable areas and the point of connection at Dungeness Power Station.
- 5.5.5 In the absence of the Project, it is reasonable to assume that these habitats will continue to be managed in a similar manner to the baseline, with agricultural practices for arable crop production and sheep grazing to continue within the developable area. The proposed cable routes currently follow areas of previously disturbed vegetated shingle and / or hardstanding (roads) associated with the nearby Dungeness Power Station. Much of the disturbance along the proposed cable routes is due to the maintenance activities associated with existing infrastructure, which is expected to remain operational. Whilst it is noted that Dungeness B is currently undergoing decommissioning, there will be a requirement to maintain the existing access road to Dungeness A and B for a period of at least 90 years.
- 5.5.6 In the short, medium and longer term, species populations and distributions will continue to fluctuate in response to standard agricultural management, such as crop rotation. As a result of intensive farming practices, many habitats and species within and adjacent to farmland are in decline due to ongoing removal or degradation due to nutrient enrichment or polluting events. Therefore, in the absence of the Project, it is likely that this trend would continue, with more common, widespread and adaptable species populations continuing to decrease.
- 5.5.7 In the longer term, changing climatic conditions resulting from climate change may impact the resilience of certain habitats and species, for example water levels within the network of watercourses may change over time, and in extreme circumstances seawater could inundate some parts of our study area. Due to the nature of the habitats and management practices present within the Site, it is unlikely that climate change will significantly impact the majority of land within the Site.

Environmental Measures

- 5.5.8 The Project seeks to minimise adverse ecological effects and to maximise the opportunities for biodiversity benefit by following the ‘mitigation hierarchy’ as referred to in the Overarching National Policy Statement for Energy (EN-1)²¹ (paragraph 4.5.1 and 4.5.8) and EIA Regulations 2017 (paragraph 18 (3)(c)), including measures to avoid, prevent, reduce and if possible, offset any identified significant adverse effects with an overall objective of delivering biodiversity net gain.
- 5.5.9 Avoidance and mitigation measures are being achieved as a result of the careful planning and design that has occurred, and will continue to occur until the Project design is fixed, and through the adoption of good construction and operation principles as described below.
- 5.5.10 Since inception, the Project has been shaped with consideration for the identified ecological constraints and opportunities within the area. The boundary has been reduced to remove sections of designated sites as far as practicable, with the Site currently overlapping with ~51 hectares (ha) of Dungeness, Romney Marsh and Rye Bay SSSI. There is a commitment for no above ground infrastructure (except for amending access routes) including solar, substation infrastructure, overhead lines or BESS infrastructure within this area, which is retained within the Site boundary, as it is currently located as potential for underground cabling or access requirements, or potential enhancement land.
- 5.5.11 There is potential for further overlap with Dungeness, Romney Marsh and Rye Bay SSSI and overlap with Dungeness NNR for the cable corridor search area. In the areas potentially impacted, these designations are geographically overlapping with the international designations for Dungeness, Romney Marsh and Rye Bay SPA and Ramsar, and Dungeness SAC. Each designation will be considered appropriately in-line with best practice guidelines.
- 5.5.12 Higher value habitats, such as woodland, hedgerow, trees and ponds, will be avoided and retained where they occur, and will be subject to biodiversity enhancement where appropriate.
- 5.5.13 Appropriate buffers (minimum 10m) will be maintained or created around habitats which are of value, including watercourses, scrub, hedgerows, trees and ponds.

²¹ Department for Energy Security and Net Zero, *Overarching National Policy Statement for Energy (EN-1)* (2023). Available at: [EN-1 Overarching National Policy Statement for Energy](#) (Accessed 01/05/2026)

- 5.5.14 Existing trees and hedgerows will be retained as far as possible and protected in accordance with best practice (BS 5837). Where the removal of such features is unavoidable, lower value features will be selected over higher value.
- 5.5.15 Existing tracks and field access locations across our Site will be utilised and where new access is unavoidable, it will be in the footprint of lower value habitats only.
- 5.5.16 The crossing of ditches will be avoided wherever possible. Where crossings are required, they will be designed in such a way as to ensure the maintenance of connectivity for aquatic fauna (fish) and semi-aquatic fauna (water vole and otter). An earlier consideration for an overhead line to be used to transfer generated energy to the point of connection at Dungeness substation has now been discounted due to the potential environmental impacts it would have on designated areas and associated features present. These impacts were associated with the large amounts of groundworks required within vegetated shingle to secure pylon footings.
- 5.5.17 The current Project boundary retains enough land within the Site to provide both species-specific mitigation and BNG. Since Phase one Consultation in September 2025, there has been further reduction in areas considered for solar installation, with parts of South Brooks C and D, and the entirety of South Brook F removed from the Project. South Brooks E is currently retained for the purposes of potential cabling and mitigation land only, based on its relative importance for wintering wildfowl (and potential as functionally linked land). Consultation has taken place with the RSPB with regard to the type of mitigation to be proposed in line with conservation priorities.

Embedded measures

- 5.5.18 Embedded measures have been incorporated into the design with commitments to stand-off from ecologically sensitive habitats including ditches, watercourses, hedgerows, treelines and woodlands by at least 10 metres, except at crossing points. Crossing points have also been minimised to reduce potential impacts, utilising existing crossing points where possible and seeking open span bridging solutions for any temporary installations required as part of the construction and decommissioning phases. Betterment will be delivered to these linear features with the areas used to stand-off from development used to provide improved wildlife corridors and diversified habitats. Cables crossing ditches will utilise directional drilling where available to reduce potential impacts to watercourses and fish.
- 5.5.19 Engagement with relevant stakeholders including statutory bodies (Natural England and the Environment Agency) and other non-government organisations and interested parties including the RSPB and KWT are on-going, with Natural England and the Environment Agency engaged within a Discretionary Advice Service

agreement. This engagement allows the Project to better understand the requirements of interested parties whilst also seeking opportunities for collaboration on local conservation projects. Proposed management plans will be updated to incorporate relevant measures outlined during the consultation process.

Management Plans and their role

- 5.5.20 Management plans are produced to outline clear actions to be taken to avoid and mitigate potential environmental impacts and are necessary to show how potential impacts will be managed, whilst also providing a means of securing those measures.
- 5.5.21 At this stage of the project draft outline management plans are produced for information purposes only, to gather consultee feedback and work to provide additional information or management inputs as required. Outline management plans containing more in-depth detail will be provided as part of the DCO submission.
- 5.5.22 Management plans that have been produced for the consultation include:
- Draft Outline Landscape and Environmental Management Plan (oLEMP);
 - Draft Outline Construction Environmental Management Plan (oCEMP); and
 - Draft Outline Construction Traffic Management Plan (oCTMP).
- 5.5.23 Further management plans will be produced and submitted as part of the DCO application and will include an outline Operation Environmental Management Plan (oOEMP) and an outline Decommissioning Environmental Management Plan (oDEMP).
- 5.5.24 Should consent be granted, the delivery of detailed management plans, to be in substantial accordance with the submitted outline plans and approved by the local planning authority, will be secured as requirements of the DCO, meaning that they must be complied with as agreed.

5.6 Preliminary Assessment of Likely Significant Effects

Approach

- 5.6.1 Once baseline data collection is complete (or near complete), and a more detailed scheme design is available, a scoping assessment in-line with Ecological Impact assessment (EclA) best practice guidelines (CIEEM, 2024) will be undertaken to identify which important ecological features are present and have remaining potential to be impacted by the Project. These features will then be 'Scoped-in' to the impact assessment. At this stage, ecological features that are not deemed to

be important (as outlined by best practice) will be removed from the process, having been 'Scoped-out' of further assessment. The Impact Assessment will take place prior to submission of the DCO and will be recorded in the ES.

5.6.2 At this Stage, as final design information is not available, a preliminary assessment of the Likely Significant Effects (LSE) must be precautionary. When considering likely significant effects on ecological features, whether these are negative or positive, the following characteristics of environmental change are taken into account:

- **Extent** – the spatial or geographical area over which the environmental change may occur.
- **Magnitude** – the size, amount, intensity or volume of the environmental change.
- **Duration** – the length of time over which the environmental change may occur.
- **Frequency** – the number of times an environmental change may occur.
- **Timing** – the periods of the day / year / season during which an environmental change may occur.
- **Reversibility** – whether the environmental change can be reversed through restoration actions or regeneration.

5.6.3 Due to the optionality that the Project retains at this time, there remains potential likely significant effects that may be removed from the assessment at a later stage, when sufficient design and programme information becomes available.

Preliminary Assessment

5.6.4 A summary of the preliminary assessment of likely significant effects on biodiversity associated with the Project is provided in Table 5-7.

Table 5-7: Potential Likely Significant Biodiversity Effects

Phase	Activity	Receptor	Preliminary Assessment	Potential Significant Effect(s)	Next Steps
All phases	Permanent land take and habitat loss / degradation associated with presence of infrastructure during operation.	Designated sites and their notified features, HPI / SPI, and protected species.	There is potential for land within designated sites (Dungeness SAC) to be impacted by the potential cable routes. These impacts are likely to be temporary in nature and limited to within areas of previously disturbed ground however vegetated shingle can have long establishment periods and disturbance could therefore impact features beyond the operational lifetime of the Project.	Following the preliminary assessment, there is the potential for significant effects upon the receptor.	Once further design information is available, including further cabling parameters and proposed engineering methods to be used and the outline management plans have been finalised, an assessment will be made to consider which important ecological features remain within the Zol that could be potentially impacted by the Project. These impacts will be

Phase	Activity	Receptor	Preliminary Assessment	Potential Significant Effect(s)	Next Steps
	<p>Increases in temporary and permanent lighting through all phases of the Project resulting in disturbance of fauna.</p>	<p>Protected species and all species listed on national biodiversity lists.</p>	<p>The adoption of a CEMP and LEMP will mitigate any significant effects. Mitigation measures outlined in the oCEMP include any lighting during the construction phase would be directional, temporary and only used during work hours and no permanent lighting for security purposes except when necessary.</p>	<p>The receptor is not expected to experience potential significant effects.</p>	<p>assessed within the ES. Further survey work is ongoing to establish the biodiversity baseline. The majority of fieldwork including passage bird survey, aquatic invertebrates and macrophytes, great crested newt, fish habitat survey, riparian mammal survey, and river condition assessment will be completed in 2026. Winter bird surveys will be undertaken between September 2026 and March 2027 to ensure there is</p>

Phase	Activity	Receptor	Preliminary Assessment	Potential Significant Effect(s)	Next Steps
					sufficient multi-year data available within the data validity period as outlined by CIEEM.
Construction	Temporary land take and habitat degradation during construction.	Designated sites, habitats and species of principal importance (HPI / SPI), and protected species.	Designated sites, HPI and SPI should not be significantly impacted via temporary land take. The adoption of a CEMP will mitigate any significant effects Degradation may impact the designated sites (Dungeness SAC) along the cable route however routing is not yet finalised and therefore no	Following the preliminary assessment, there is the potential for significant effects upon the receptor.	Finalise cable route(s) within designated sites (Dungeness SAC) to assess potential impacts. Assess fully at ES stage with finalised design and engineering information. Further survey work is ongoing to establish the biodiversity baseline.

Phase	Activity	Receptor	Preliminary Assessment	Potential Significant Effect(s)	Next Steps
			<p>conclusions or assessment can be drawn, at this stage there remains potential for LSE. Any impacts will be managed sensitively through management plans.</p>		
<p>Operation</p>	<p>Changes in hydrology (ground water levels and surface water run-off rates) resulting in habitat change during operation.</p>	<p>Designated sites, protected species and all habitats and species listed on national biodiversity lists.</p>	<p>Substations and BESS locations will achieve greenfield rates of run-off. Within solar arrays, run-off will be managed locally to retain water and reduce surface water run-off. These built features occur within predominantly</p>	<p>The receptor is not expected to experience potential significant effects.</p>	<p>Once further design information is available, including further cabling parameters and proposed engineering methods to be used and the outline management plans have been finalised, an assessment will be</p>

Phase	Activity	Receptor	Preliminary Assessment	Potential Significant Effect(s)	Next Steps
			<p>arable land or permanent grassland, neither of which are sensitive to small changes in ground water levels. There should be no discernible change in ground water levels / surface water run off within areas of vegetated shingle along the cable routes and therefore no perceived changes are likely to occur</p>		<p>made to consider which important ecological features remain within the ZoI that could be potentially impacted by the Project. These impacts will be assessed within the ES. Further survey work is ongoing to establish the biodiversity baseline. The majority of fieldwork including passage bird survey, aquatic invertebrates and macrophytes, great crested newt, fish habitat survey, riparian mammal</p>
<p>Construction and operation</p>	<p>Fragmentation of semi-natural habitats due to habitat loss / degradation and reduction in</p>	<p>Protected species and all species listed on national biodiversity lists.</p>	<p>Connectivity of semi-natural habitats within the Site will be maintained as far</p>	<p>The receptor is not expected to experience potential significant effects.</p>	

Phase	Activity	Receptor	Preliminary Assessment	Potential Significant Effect(s)	Next Steps
	<p>landscape permeability due to the presence of infrastructure during construction and operation.</p>		<p>as practicable within the Site. Embedded measures will ensure stand-offs to important features (such as semi-natural habitats) to improve their potential to support protected species and other notable priority species such as those on the national biodiversity lists. The adoption of a CEMP and LEMP will mitigate any significant effects.</p>		<p>survey, and river condition assessment will be completed in 2026. Winter bird surveys will be undertaken between September 2026 and March 2027 to ensure there is sufficient multi-year data available within the data validity period as outlined by CIEEM.</p>
	<p>Changes in ground water levels and surface water movement patterns</p>	<p>Designated sites, protected species and all habitats and species listed</p>	<p>Substations and BESS locations will achieve greenfield rates of run-off</p>	<p>The receptor is not expected to experience</p>	

Phase	Activity	Receptor	Preliminary Assessment	Potential Significant Effect(s)	Next Steps
	<p>due to imposition of temporary and permanent drainage resulting in habitat degradation during construction and operation</p>	<p>on national biodiversity lists.</p>	<p>once built however there may be a short period during construction when greenfield rates are not achieved / achievable. Construction compounds will be located appropriately (outside of potentially sensitive habitats) to reduce potential impact pathways. The adoption of a CEMP will mitigate any significant effects There should be no discernible change in ground water levels / surface water run off within areas of</p>	<p>potential significant effects.</p>	

Phase	Activity	Receptor	Preliminary Assessment	Potential Significant Effect(s)	Next Steps
			<p>vegetated shingle along the cable routes and therefore no perceived changes are likely to occur.</p>		
<p>Construction and decommissioning</p>	<p>Increases in noise, vibration and human presence during the construction phase resulting in disturbance of fauna.</p>	<p>Protected species and all species listed on national biodiversity lists.</p>	<p>The adoption of a CEMP will mitigate any significant effects. Known protected species receptors will be suitably buffered / managed to avoid and reduce potential impacts as far as practicable. Works will be timed appropriately to ensure minimal disturbance.</p>	<p>The receptor is not expected to experience potential significant effects.</p>	

Phase	Activity	Receptor	Preliminary Assessment	Potential Significant Effect(s)	Next Steps
	<p>Accidental spread of invasive non-native species due to construction activity during construction phase</p>	<p>Designated sites, protected species and all habitats and species listed on national biodiversity lists.</p>	<p>The adoption of a CEMP will mitigate any significant effects.</p>	<p>The receptor is not expected to experience potential significant effects.</p>	
	<p>Pollution of terrestrial and freshwater habitats through loss of chemicals and fines / dust from the Site, particularly during construction, with some potential during decommissioning.</p>	<p>Designated sites, protected species and all habitats and species listed on national biodiversity lists.</p>	<p>The adoption of a CEMP will mitigate any significant effects. Construction compounds and lay down areas will all be sited away from watercourses to reduce potential pathways as far as practicable.</p>	<p>The receptor is not expected to experience potential significant effects.</p>	

Drawing number

Figure 5-3






Project/Location

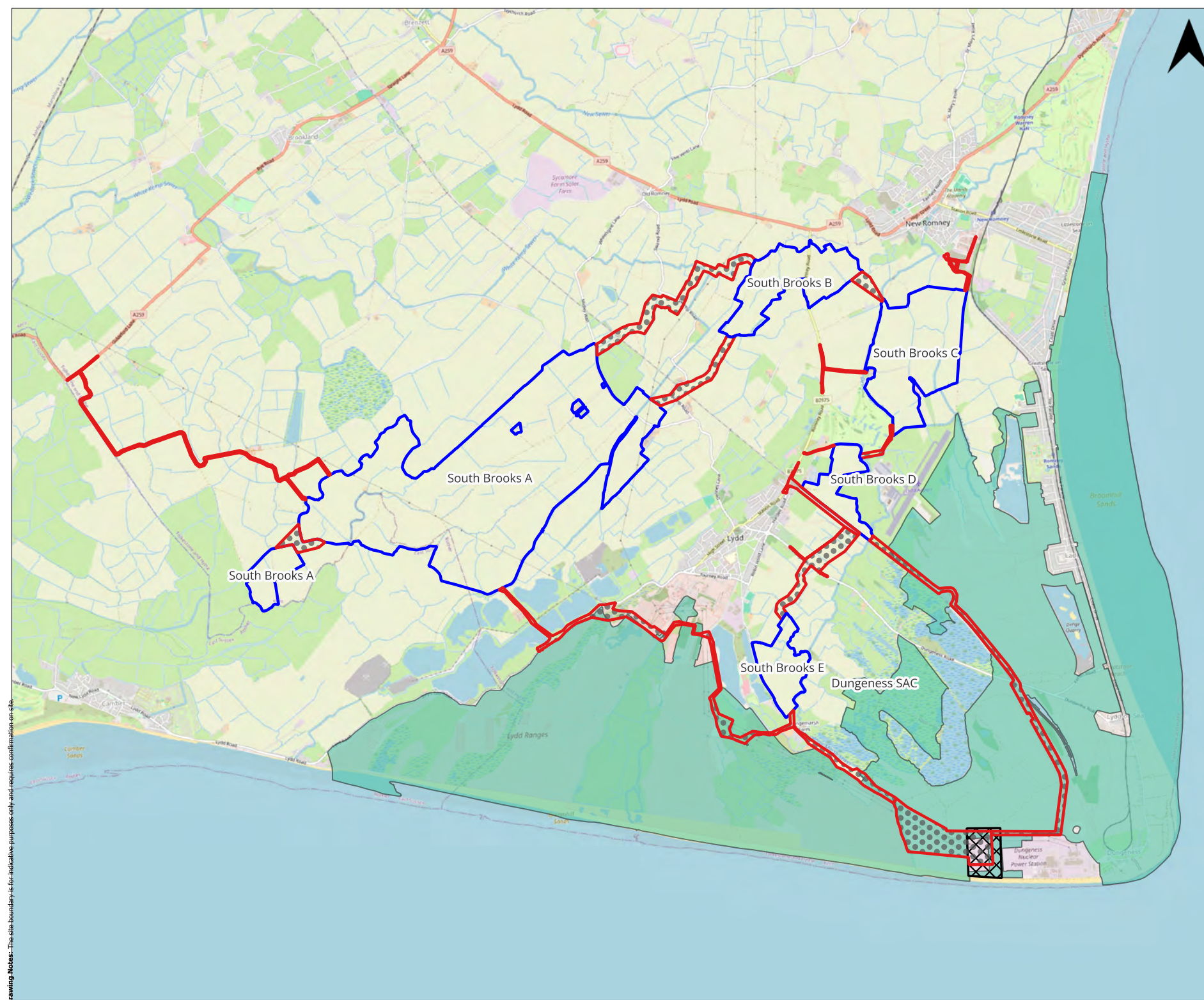
South Brooks Solar Farm

Drawing title

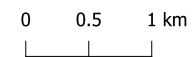
Special Areas of Conservation

Legend

-  Site Boundary
-  Development Areas
-  Potential Land for Cable Routes
-  Dungeness Substation
-  Special Areas of Conservation



Drawing Notes: This site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-4






Project/Location

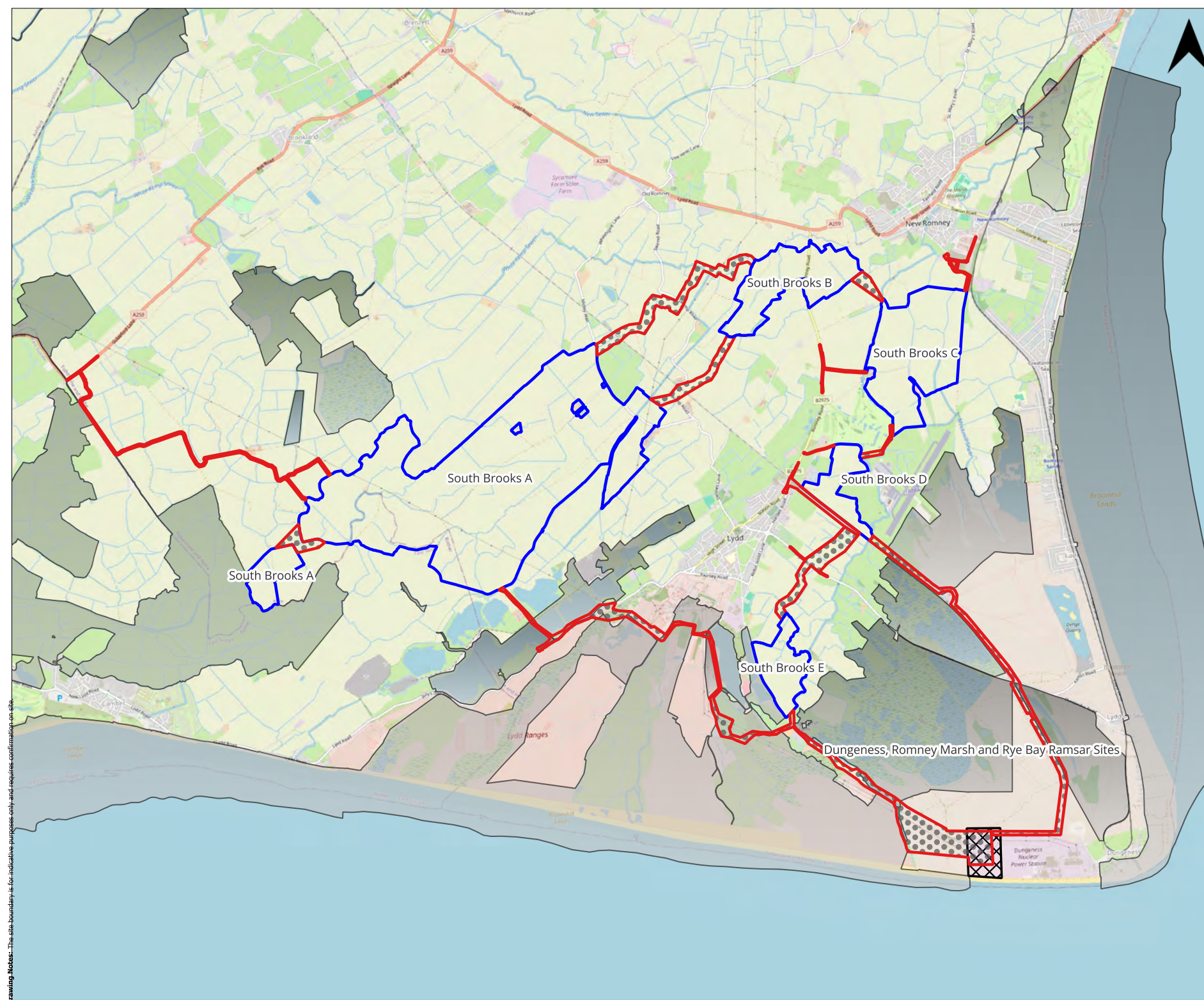
South Brooks Solar Farm

Drawing title

Ramsar Sites

Legend

-  Site Boundary
-  Development Areas
-  Potential Land for Cable Routes
-  Dungeness Substation
-  Ramsar

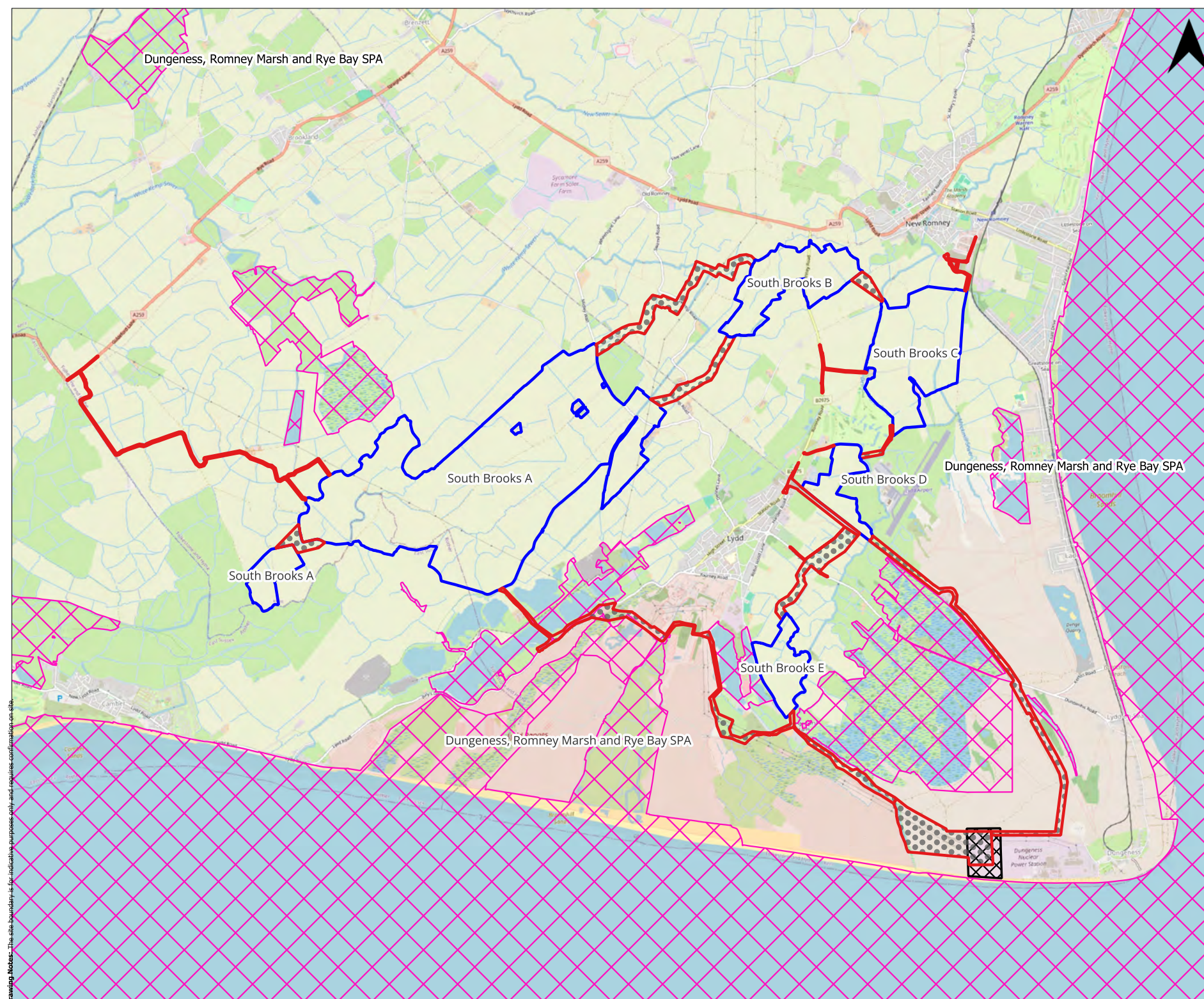


Drawing Notes: This site boundary is for indicative purposes only and requires confirmation on site.



Legend

-  Site Boundary
-  Development Areas
-  Potential Land for Cable Routes
-  Dungeness Substation
-  Special Protection Areas



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-6






Project/Location

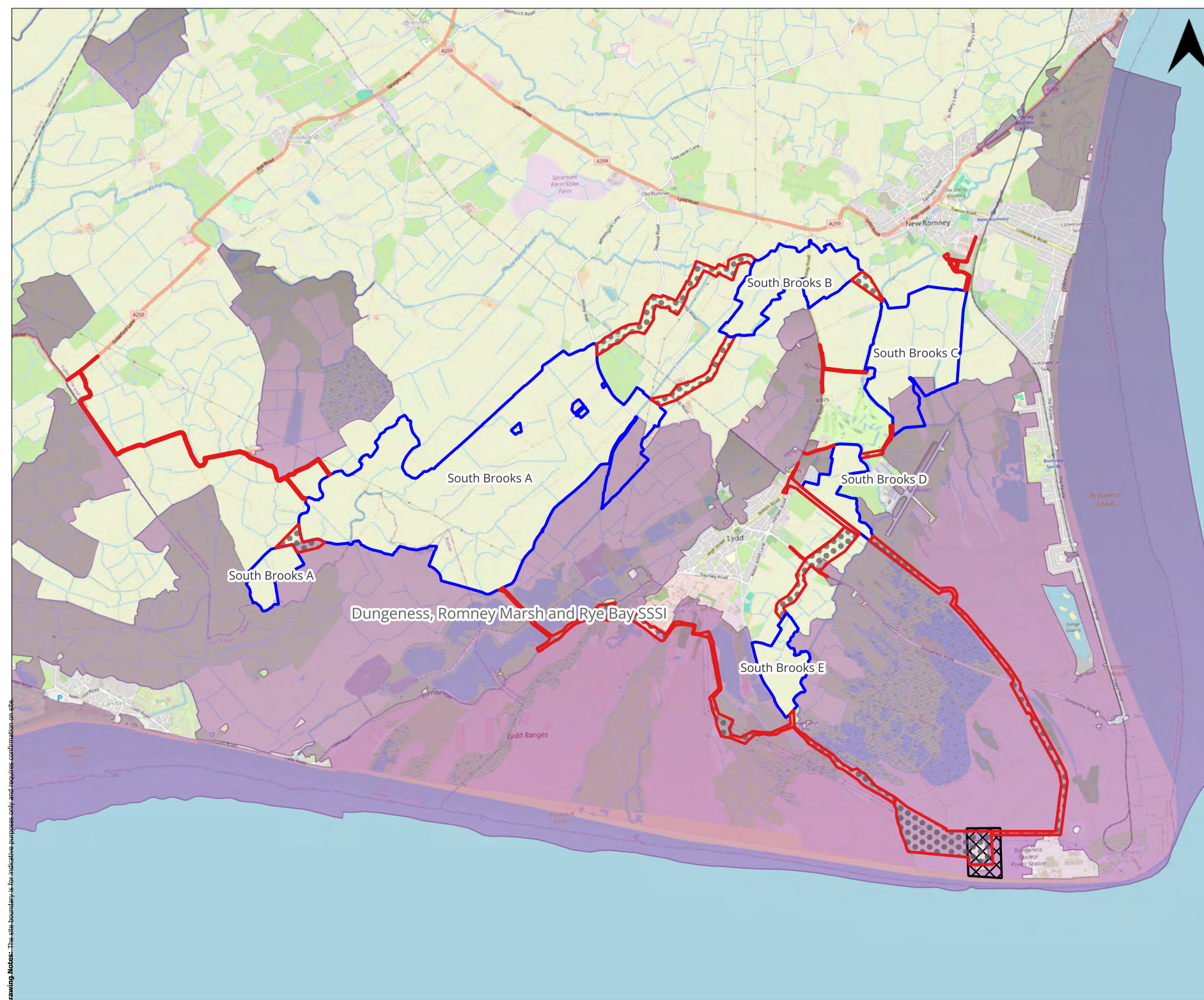
South Brooks Solar Farm

Drawing title

Sites of Special Scientific Interest

Legend

-  Site Boundary
-  Development Areas
-  Potential Land for Cable Routes
-  Dungeness Substation
-  Sites of Special Scientific Interest



Drawing Notes: This site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-7

Project/Location

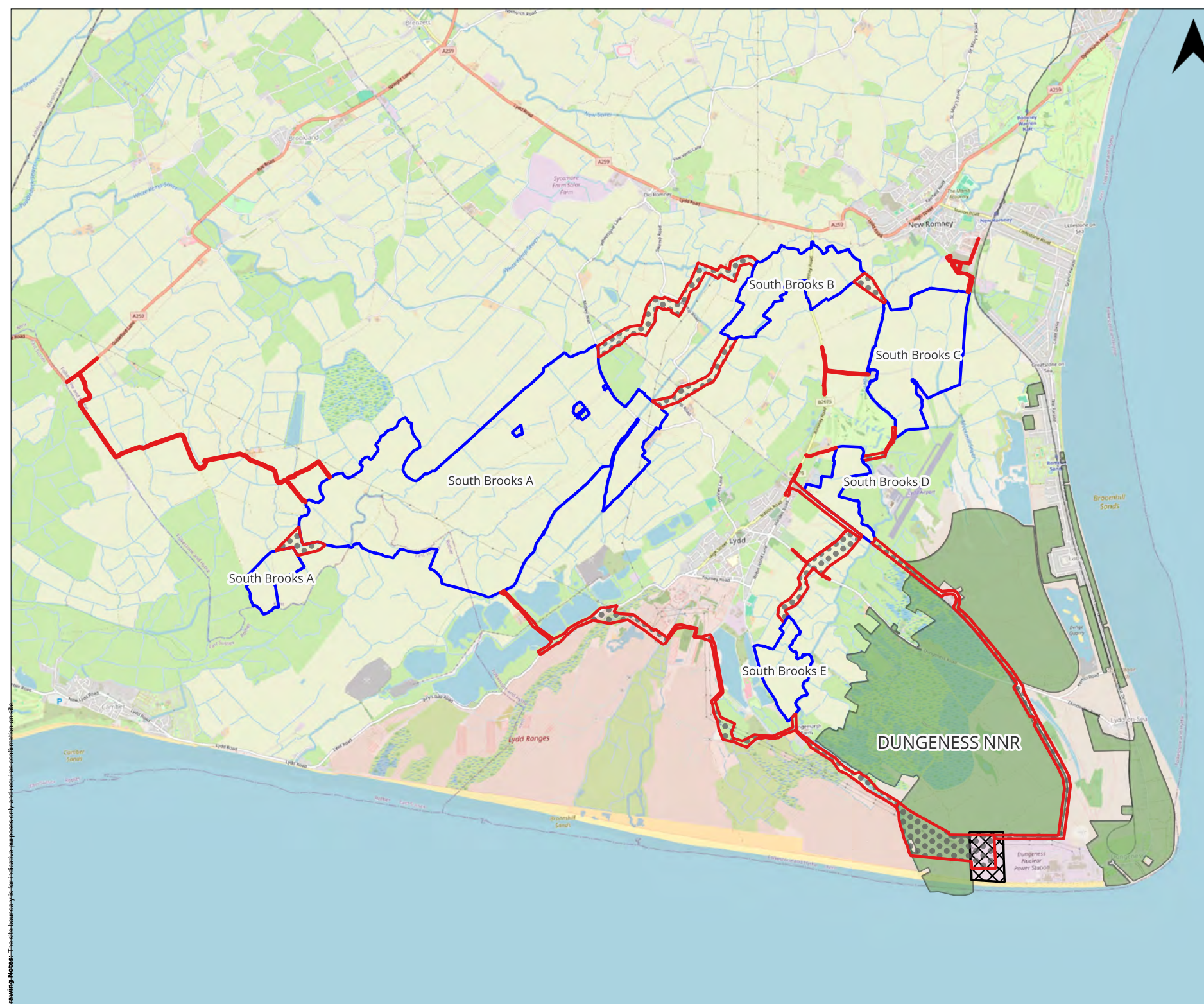
South Brooks Solar Farm

Drawing title

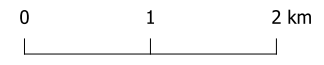
National Nature Reserves

Legend

- Site Boundary
- Development Areas
- Potential Land for Cable Routes
- Dungeness Substation
- National Nature Reserves (NNR)



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-8

Project/Location

South Brooks Solar Farm

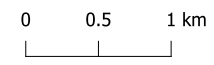
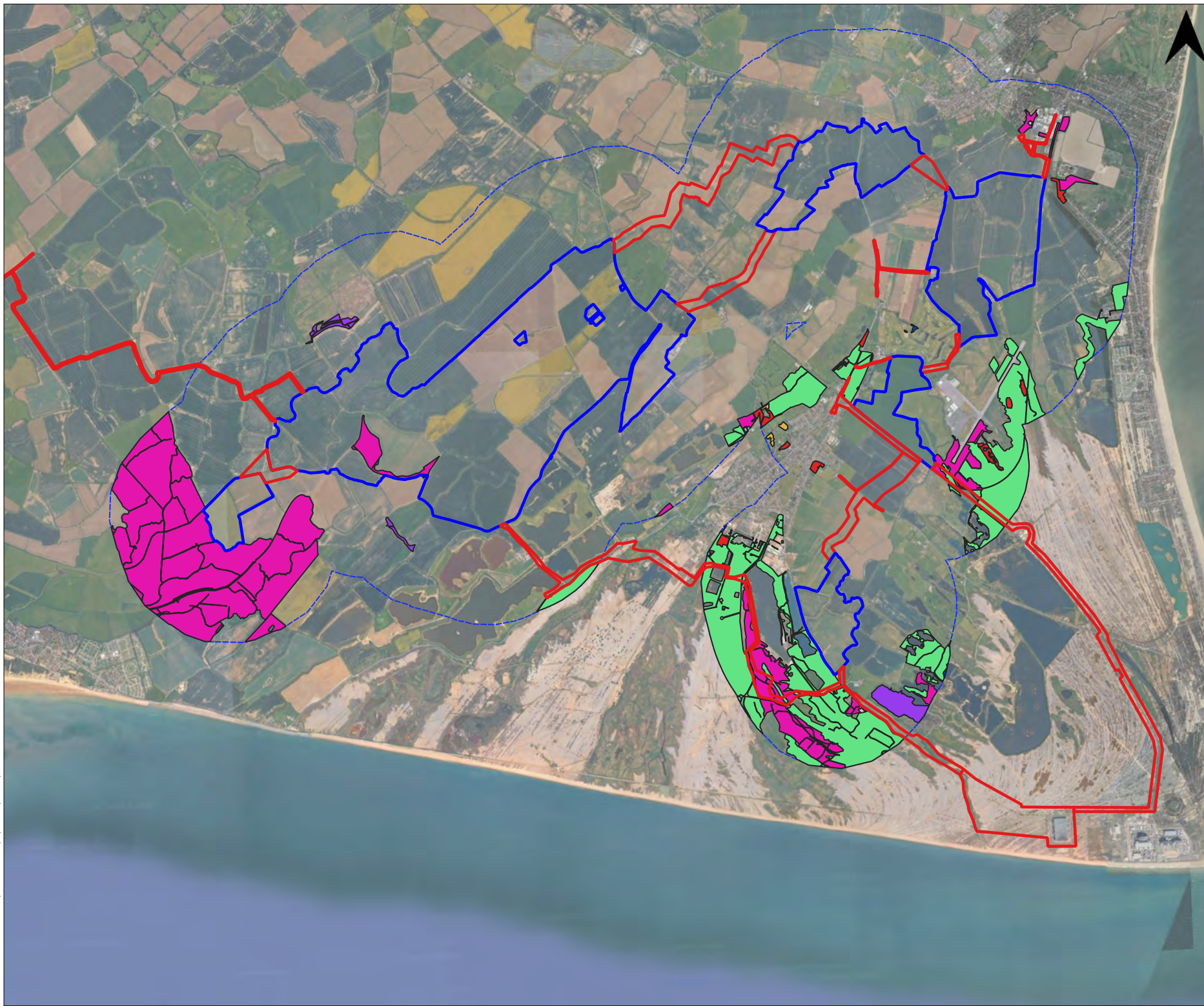
Drawing title

Priority habitats within the Study Area

Legend

-  Site Boundary
-  Development Areas
-  1km buffer
-  Coastal and floodplain grazing marsh
-  Coastal vegetated shingle
-  Deciduous woodland
-  Ponds
-  Reedbeds
-  Traditional orchard

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-9

Project/Location

South Brooks Solar Farm

Drawing title

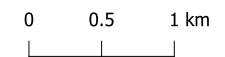
Waterbodies and ditches within 250m of the Site

Legend

-  Site Boundary
-  Development Areas
-  Ditches
-  Ditch survey locations
-  Ponds



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks A Baseline Habitats

Legend


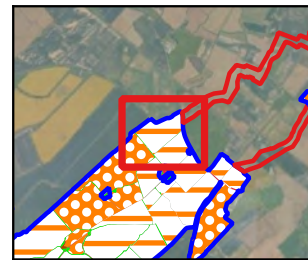
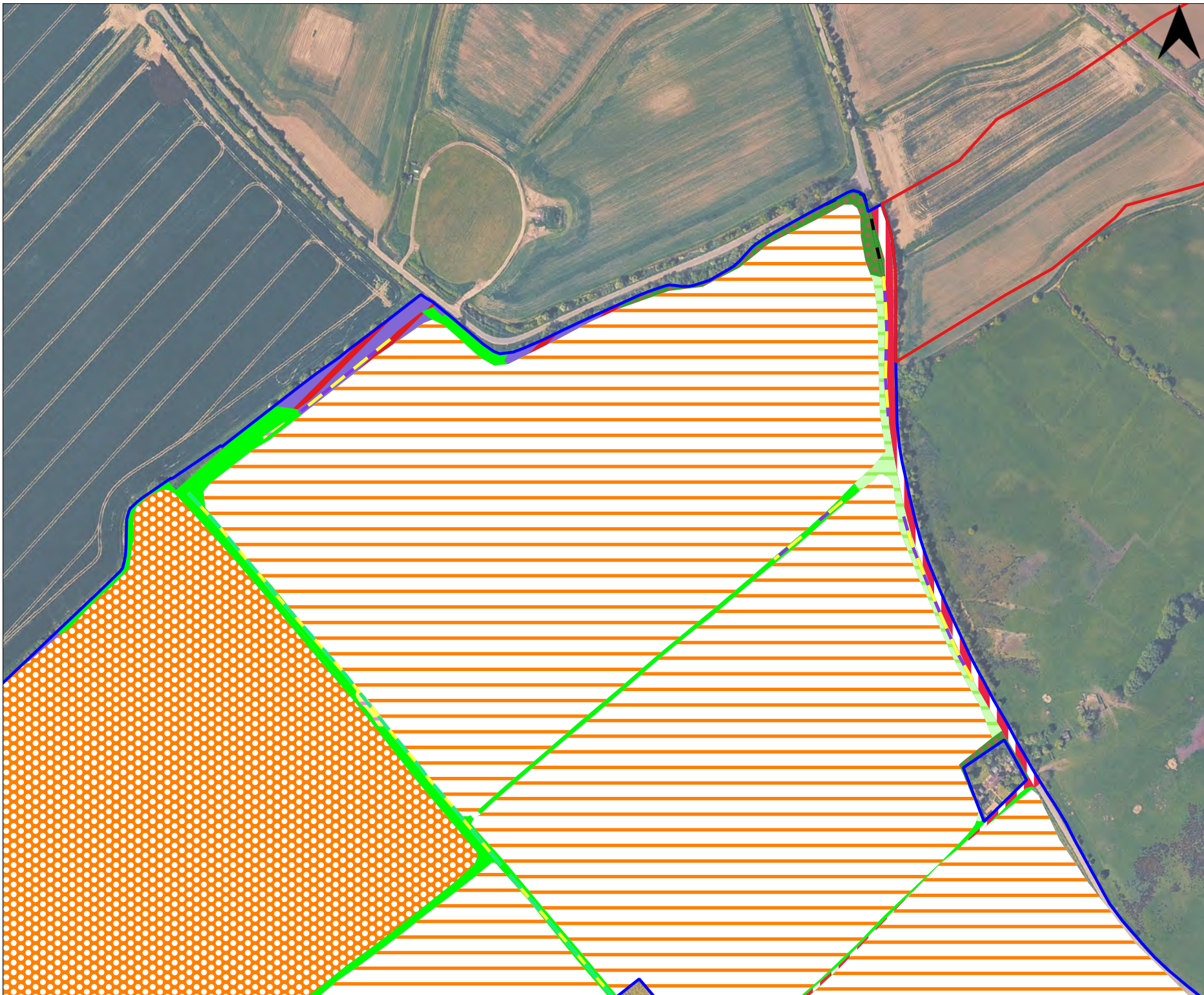
-  Site Boundary
-  Development Areas
-  Reedbed
-  Other Broadleaved Woodland
-  Willow scrub
-  Mixed scrub
-  Other Neutral Grassland
-  Modified Grassland
-  Non-cereal crops
-  Cereal crops
-  Developed land; sealed surface
-  Line of trees
-  Native hedgerow
-  Ditch

Figure: 1A



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-10








Project/Location

South Brooks Solar Farm

Drawing title

South Brooks A Baseline Habitats

Legend

-  Development Areas
-  Other Neutral Grassland
-  Modified Grassland
-  Cereal crops
-  Built linear feature
-  Native hedgerow
-  Ditch

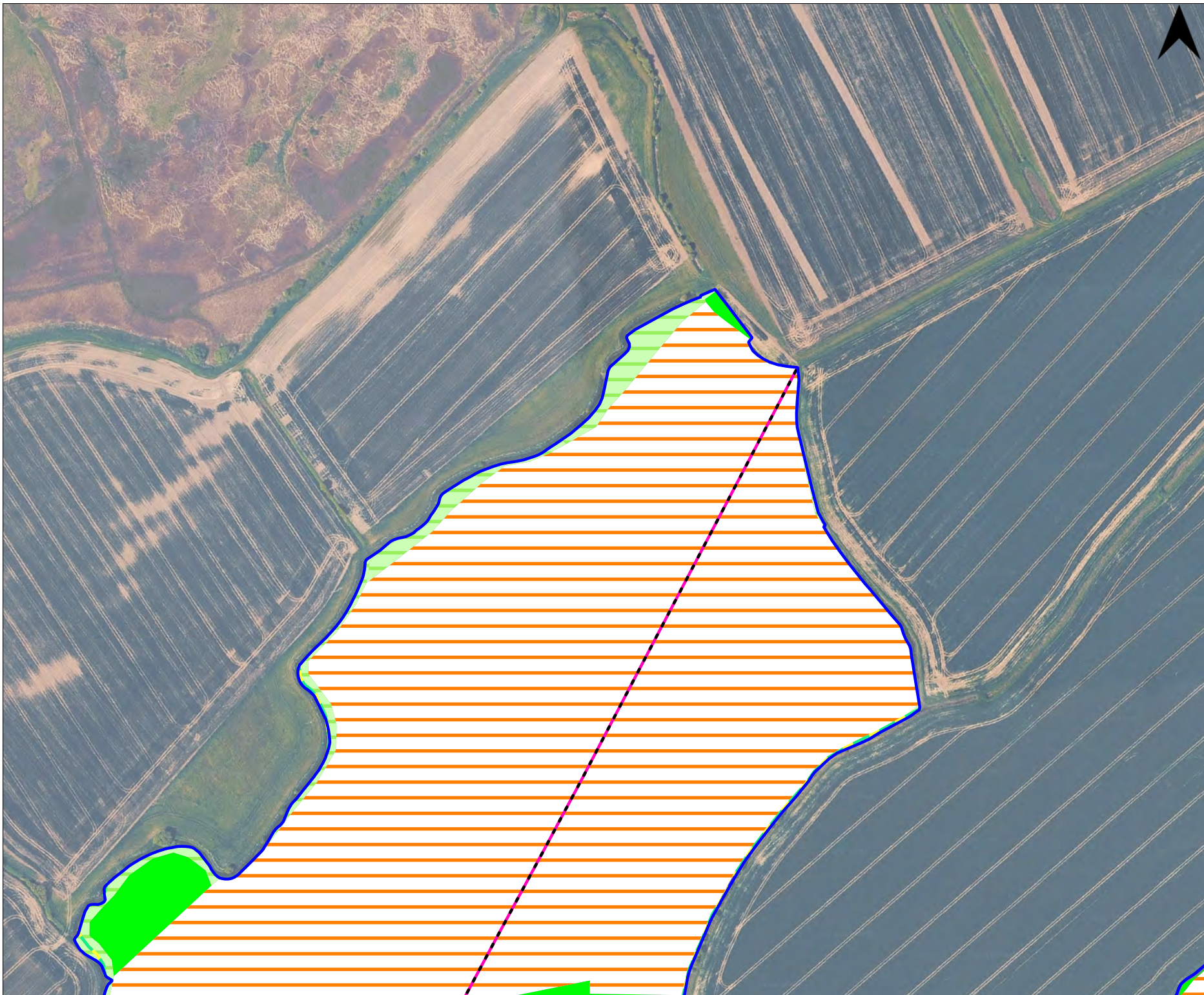


Figure: 2A



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing number

Figure 5-10







Project/Location

South Brooks Solar Farm

Drawing title

South Brooks A Baseline Habitats

Legend

-  Development Areas
-  Modified Grassland
-  Non-cereal crops
-  Artificial unvegetated, unsealed surface
-  Line of trees
-  Native hedgerow

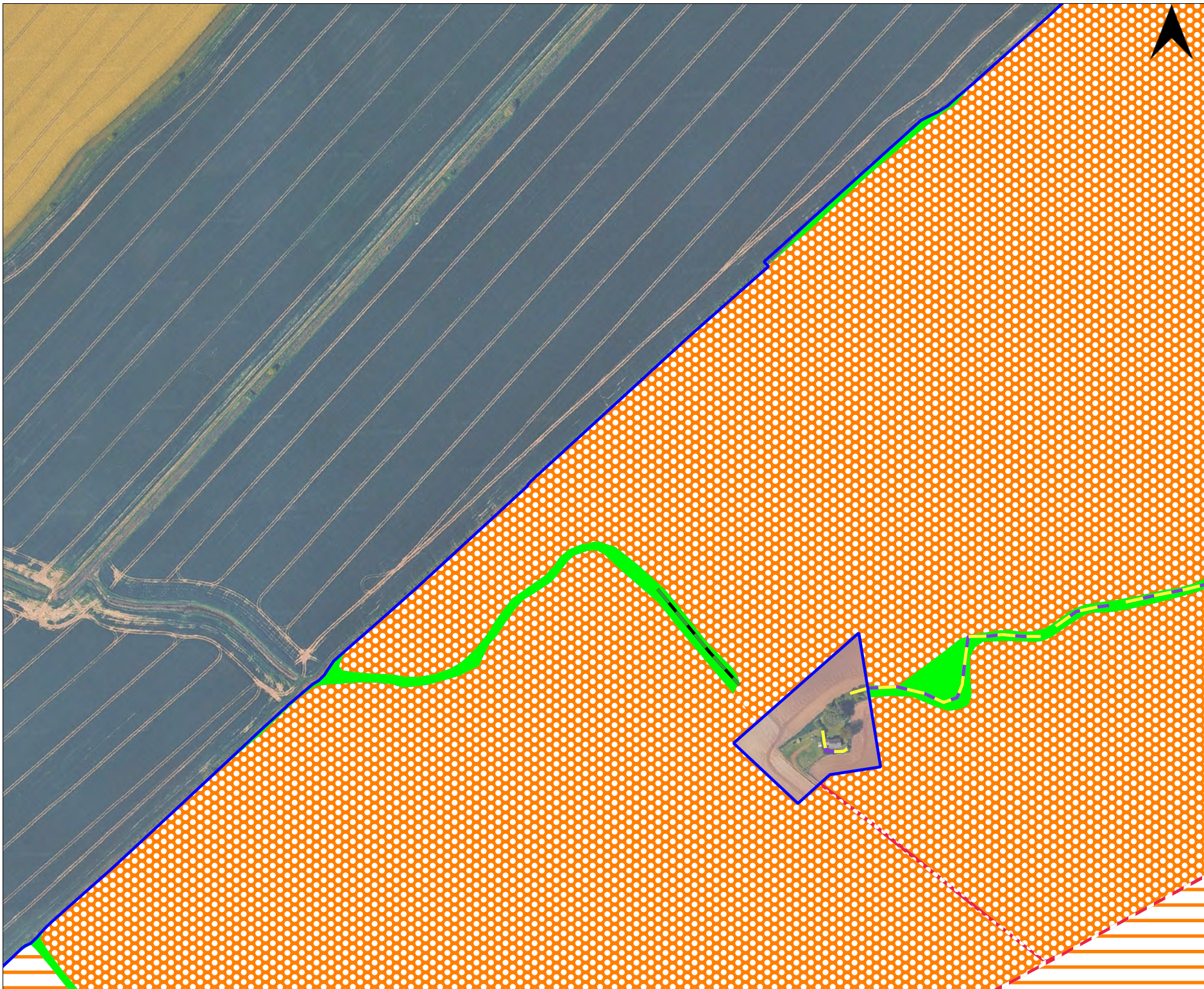
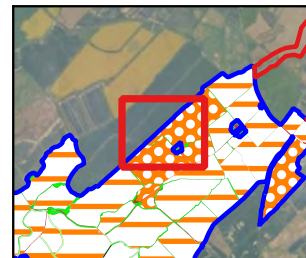


Figure: 3A



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

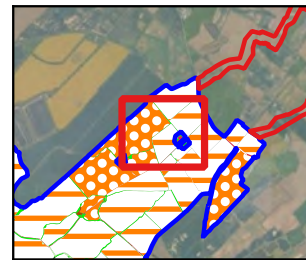
Drawing title

South Brooks A Baseline Habitats

Legend

-  Development Areas
-  Reedbed
-  Willow scrub
-  Bramble Scrub
-  Modified Grassland
-  Non-cereal crops
-  Cereal crops
-  Artificial unvegetated, unsealed surface
-  Suburban mosaic of developed and natural surface
-  Developed land; sealed surface
-  Native hedgerow
-  Ditch

Figure: 4A



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks A Baseline Habitats

Legend











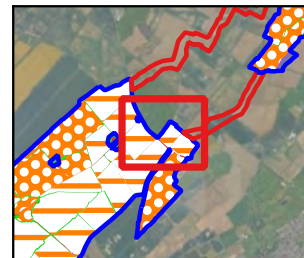
-  Site Boundary
-  Development Areas
-  Other Broadleaved Woodland
-  Other Neutral Grassland
-  Modified Grassland
-  Non-cereal crops
-  Cereal crops
-  Developed land; sealed surface
-  Native hedgerow
-  Ditch

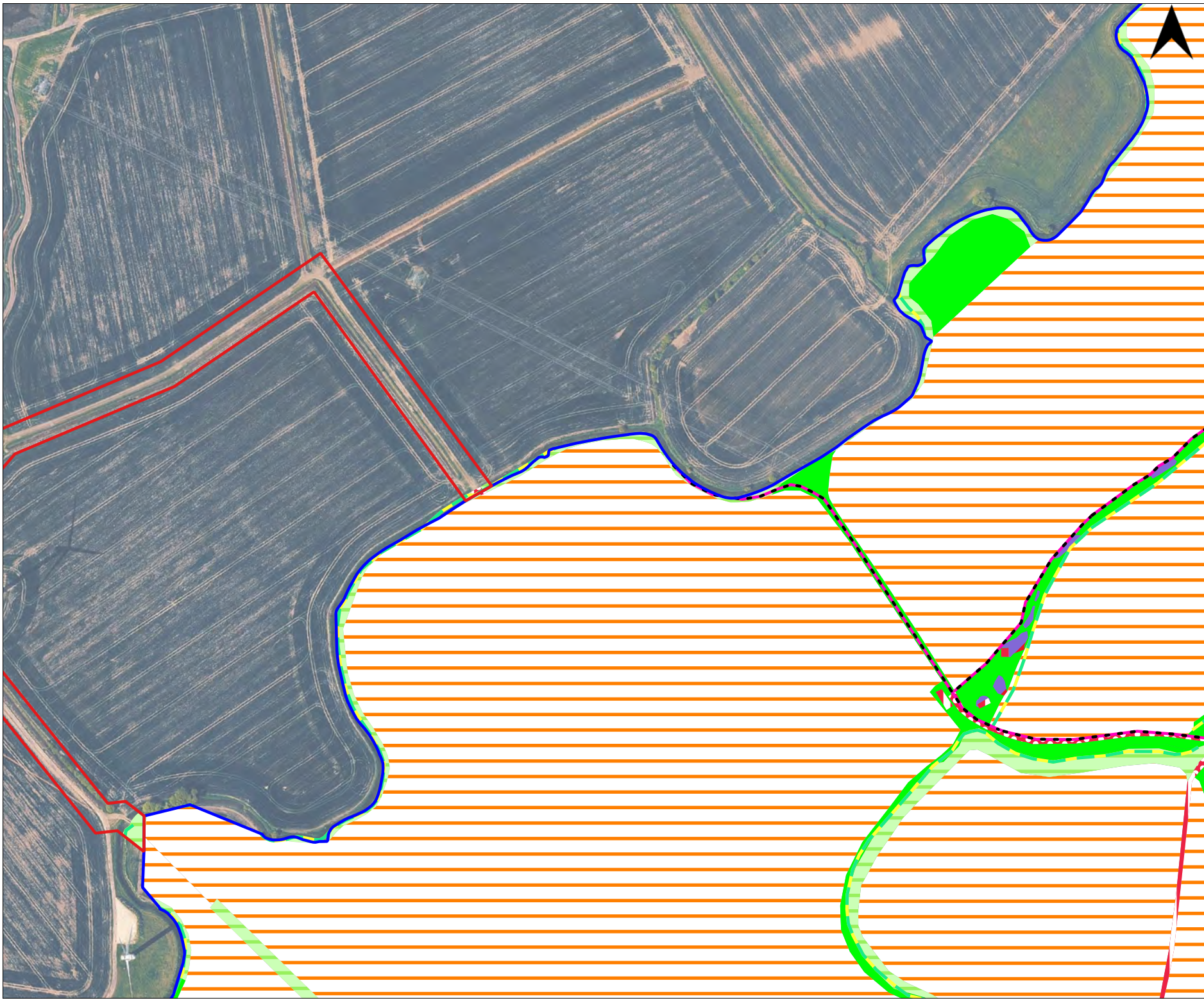


Figure: 5A



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

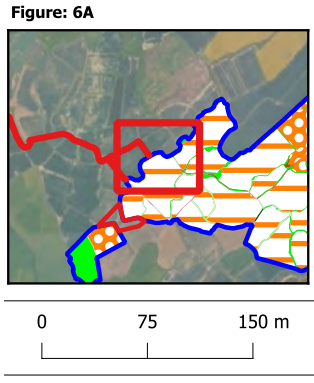


Drawing number
Figure 5-10

Project/Location
South Brooks Solar Farm

Drawing title
South Brooks A Baseline Habitats

- Legend
-  Site Boundary
 -  Development Areas
 -  Willow scrub
 -  Hawthorn scrub
 -  Mixed scrub
 -  Other Neutral Grassland
 -  Modified Grassland
 -  Cereal crops
 -  Artificial unvegetated, unsealed surface
 -  Developed land; sealed surface
 -  Built linear feature
 -  Ditch



Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks A Baseline Habitats

Legend

-  Development Areas
-  Hawthorn scrub
-  Other Neutral Grassland
-  Modified Grassland
-  Cereal crops
-  Artificial unvegetated, unsealed surface
-  Developed land; sealed surface
-  Built linear feature
-  Native hedgerow
-  Ditch

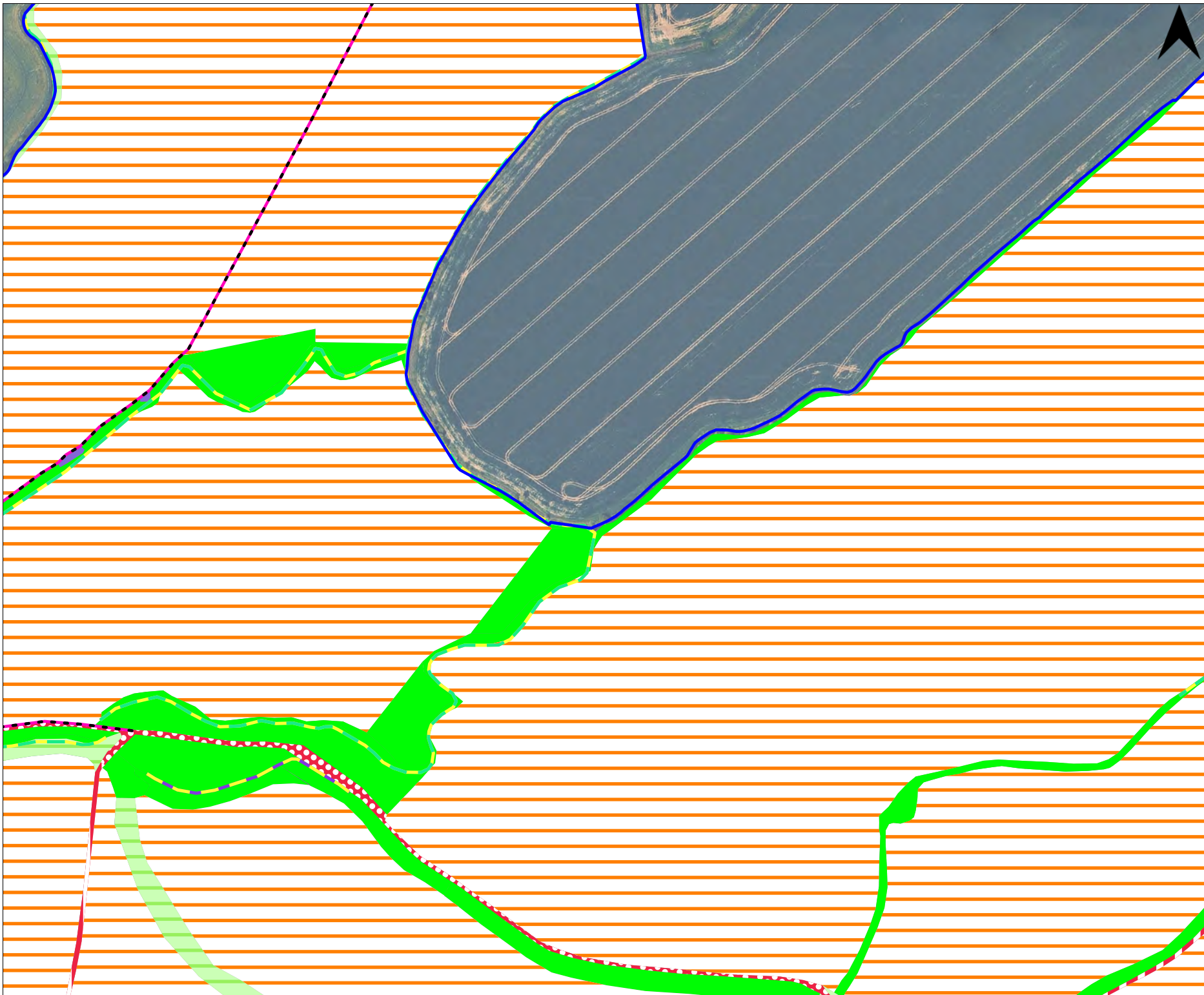
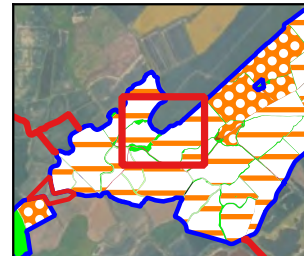


Figure: 7A



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks A Baseline Habitats

Legend













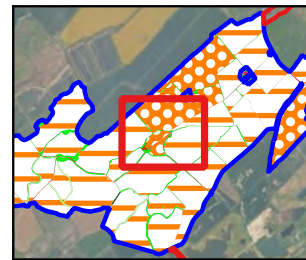
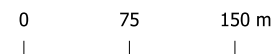
-  Development Areas
-  Other Lowland Mixed Deciduous
-  Modified Grassland
-  Non-cereal crops
-  Cereal crops
-  Temporary grass and clover leys
-  Artificial unvegetated, unsealed surface
-  Suburban mosaic of developed and natural surface
-  Developed land; sealed surface
-  Built linear feature
-  Native hedgerow
-  Ditch

Figure: 8A



0 75 150 m



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks A Baseline Habitats

Legend








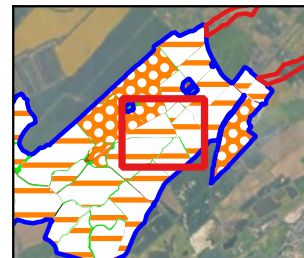
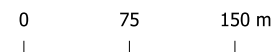
-  Development Areas
-  Modified Grassland
-  Non-cereal crops
-  Cereal crops
-  Artificial unvegetated, unsealed surface
-  Developed land; sealed surface
-  Native hedgerow
-  Ditch

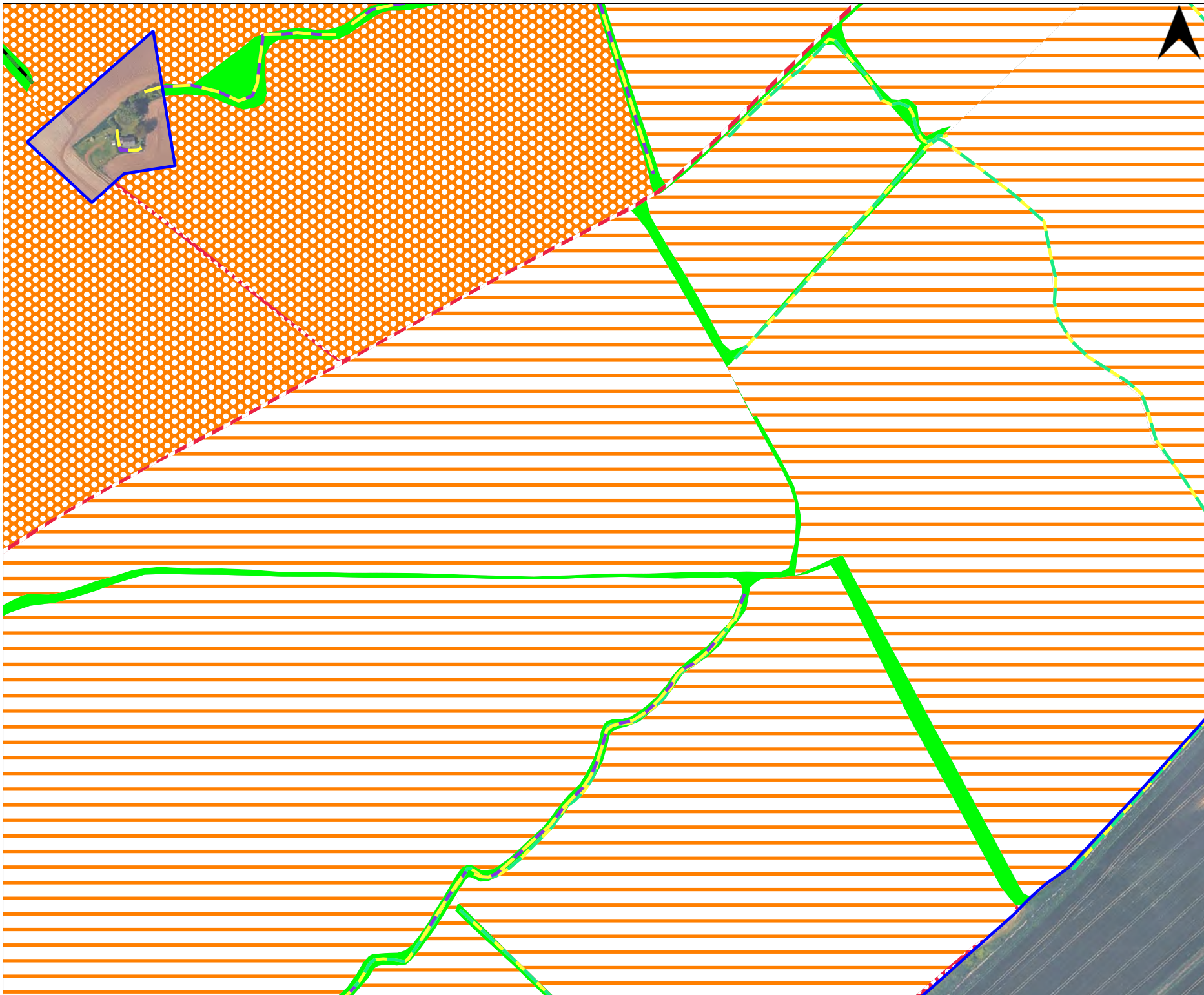
Figure: 9A



0 75 150 m



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks A Baseline Habitats

Legend






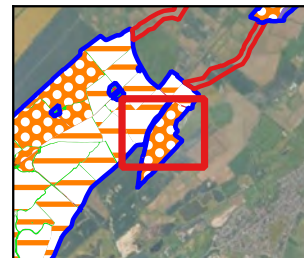
-  Development Areas
-  Non-cereal crops
-  Cereal crops
-  Developed land; sealed surface
-  Ditch



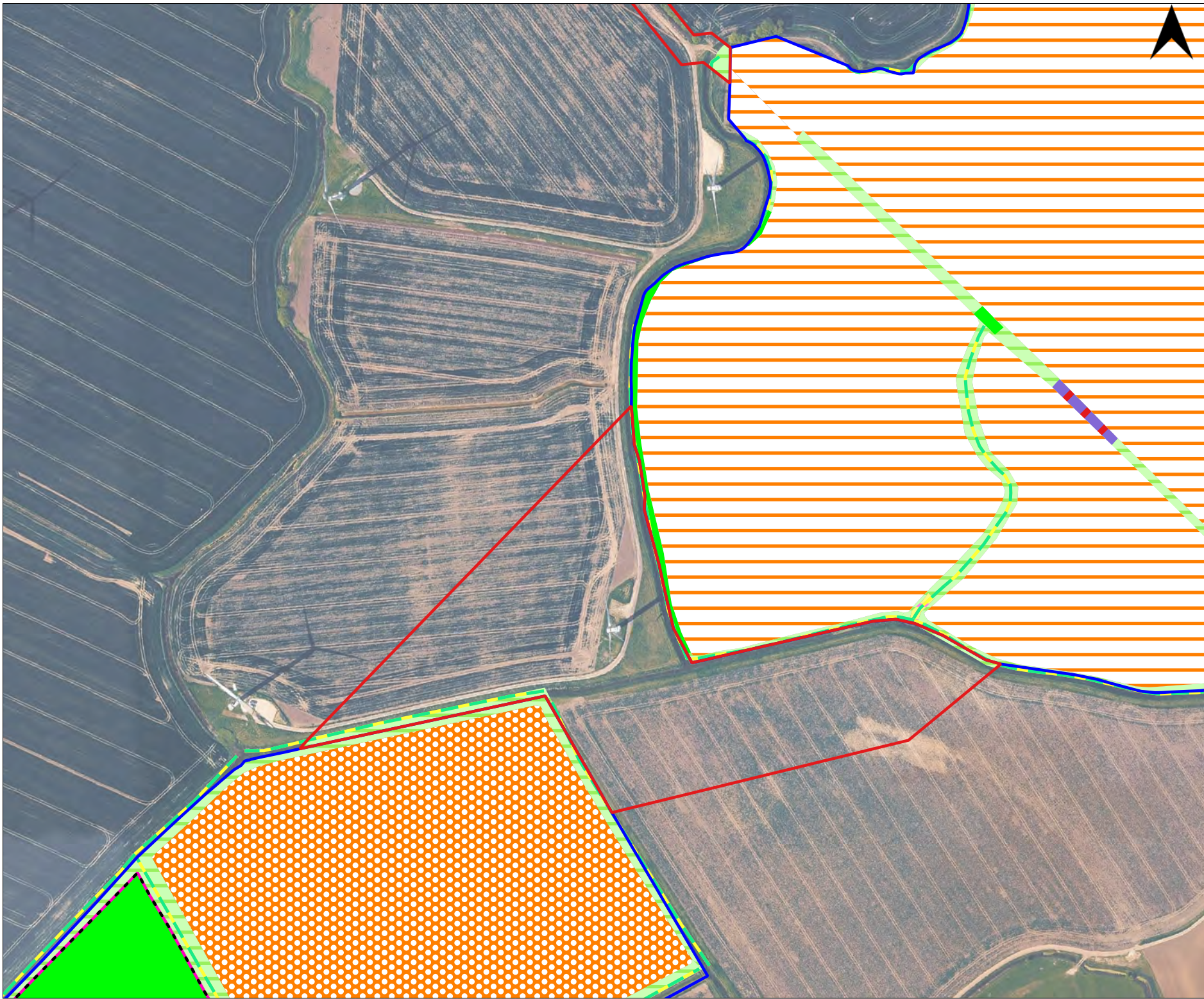
Figure: 10A



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

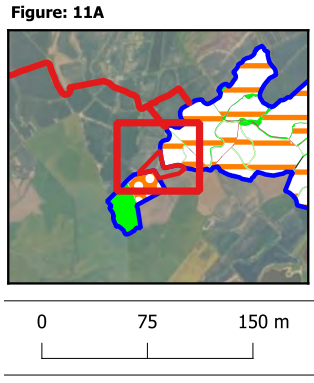


Drawing number
Figure 5-10

Project/Location
South Brooks Solar Farm

Drawing title
South Brooks A Baseline Habitats

- Legend
-  Site Boundary
 -  Development Areas
 -  Reedbed
 -  Willow scrub
 -  Other Neutral Grassland
 -  Modified Grassland
 -  Cereal crops
 -  Temporary grass and clover leys
 -  Built linear feature
 -  Ditch



Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks A Baseline Habitats

Legend






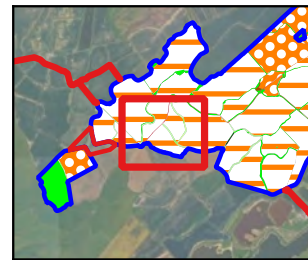
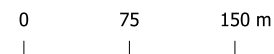
-  Development Areas
-  Reedbed
-  Other Neutral Grassland
-  Modified Grassland
-  Cereal crops
-  Arable field margins
-  Artificial unvegetated, unsealed surface
-  Developed land; sealed surface
-  Native hedgerow
-  Ditch

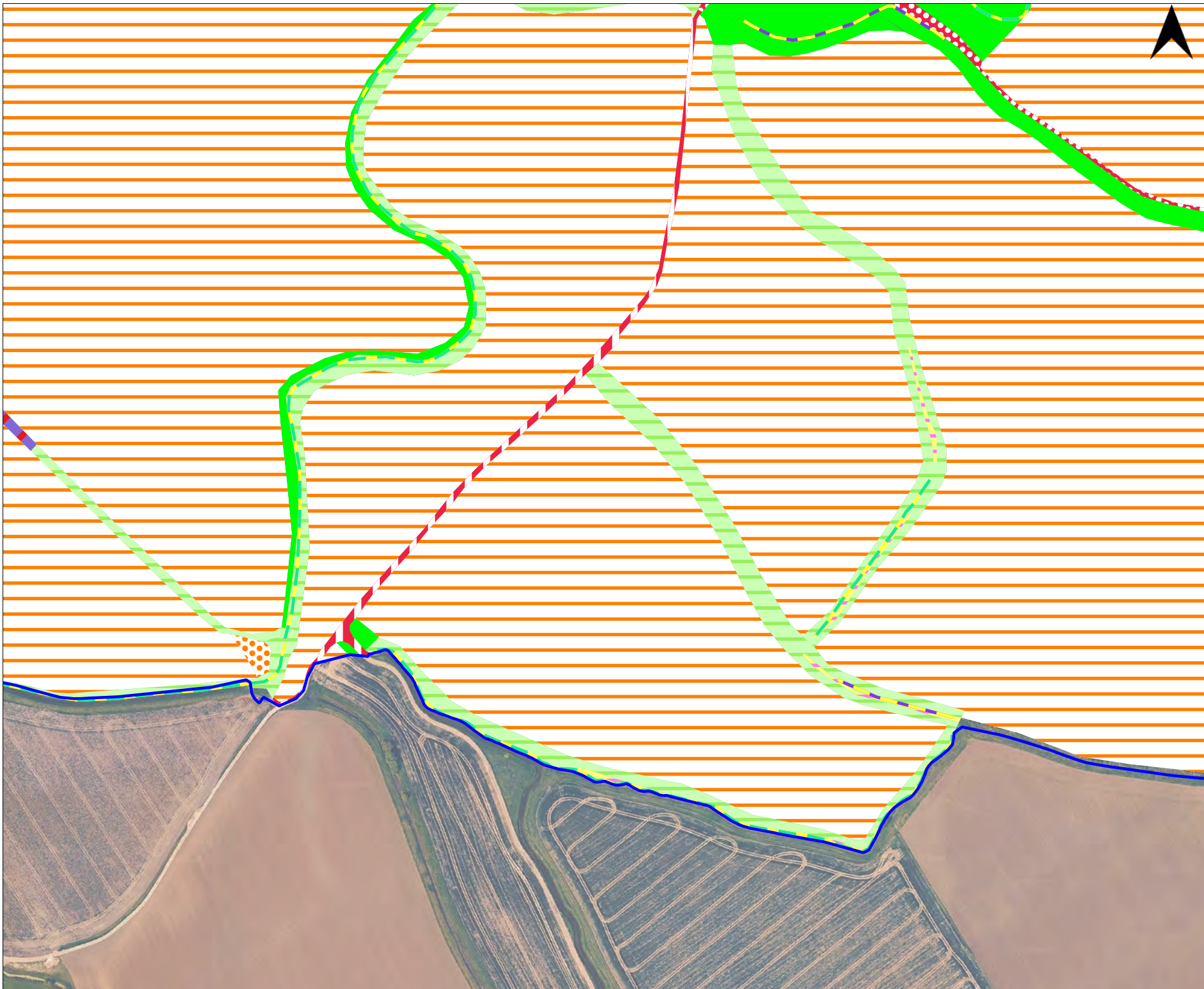
Figure: 12A



0 75 150 m



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks A Baseline Habitats

Legend

-  Development Areas
-  Aquatic marginal vegetation
-  Hawthorn scrub
-  Other Neutral Grassland
-  Modified Grassland
-  Cereal crops
-  Artificial unvegetated, unsealed surface
-  Suburban mosaic of developed and natural surface
-  Developed land; sealed surface
-  Built linear feature
-  Ditch

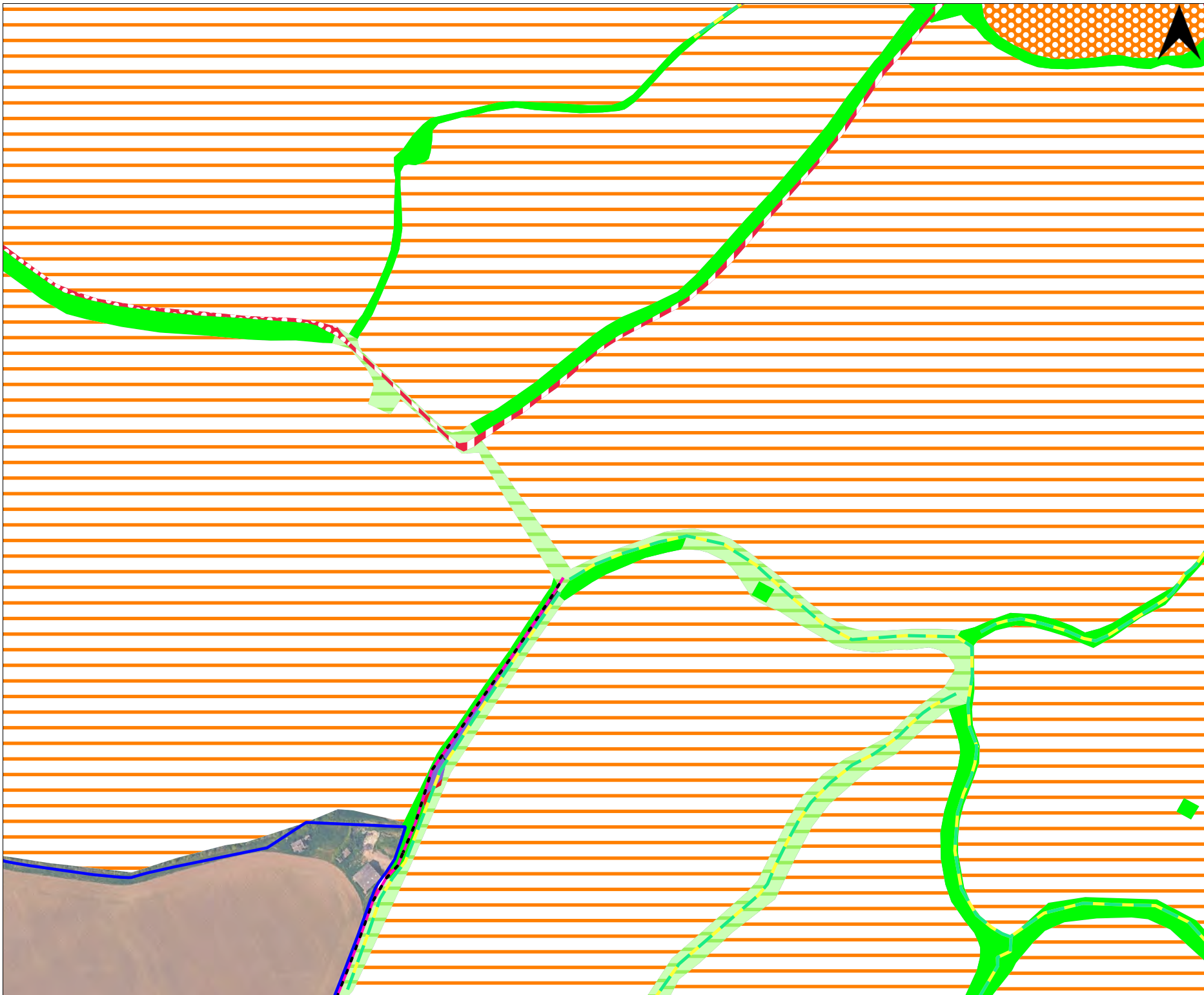
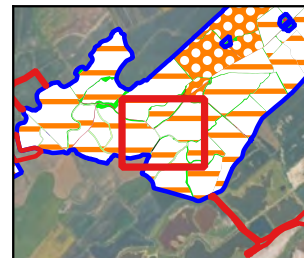


Figure: 13A



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

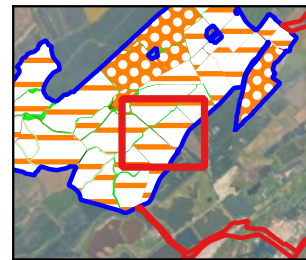
Drawing title

South Brooks A Baseline Habitats

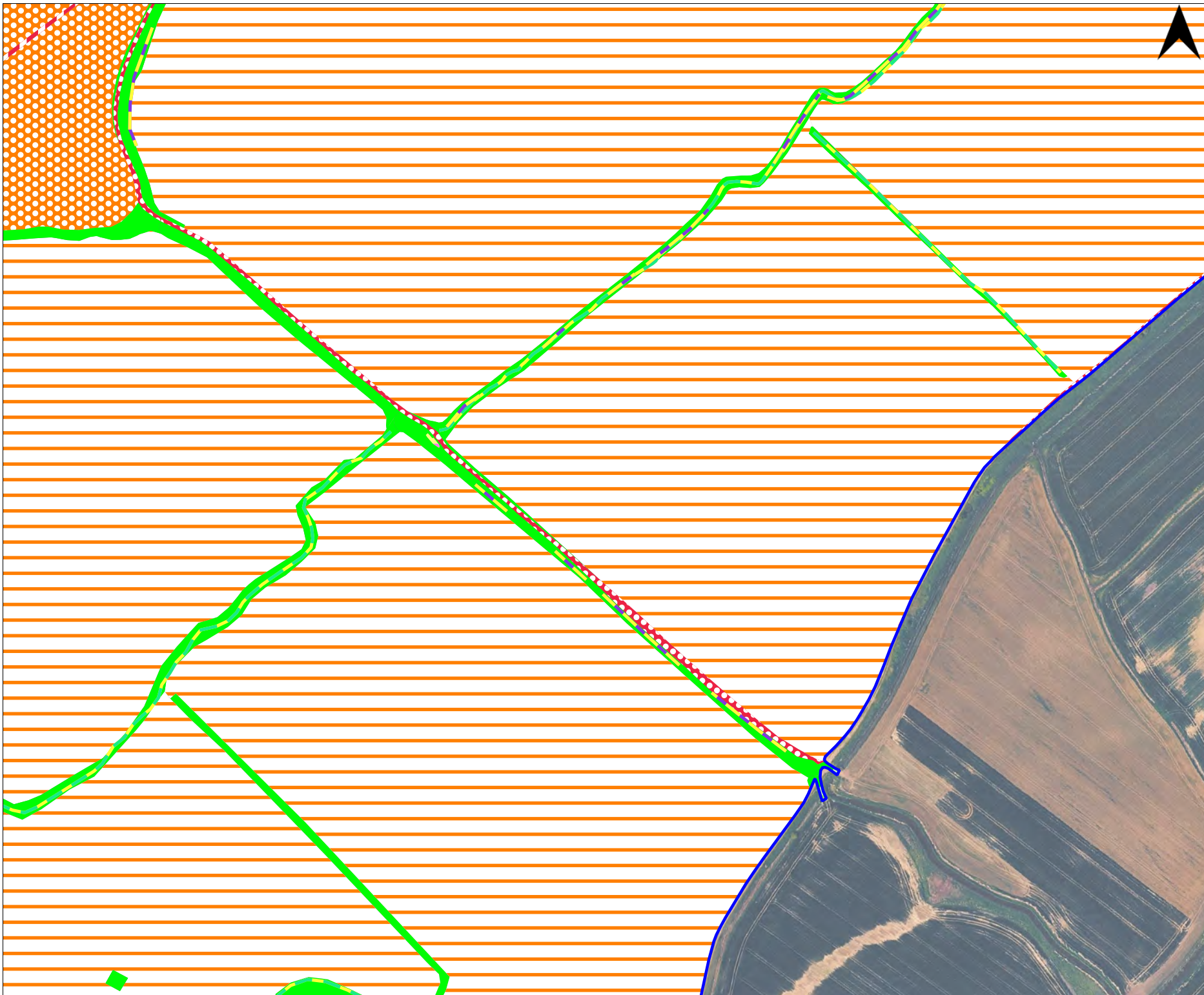
Legend

-  Development Areas
-  Reedbed
-  Other Neutral Grassland
-  Modified Grassland
-  Cereal crops
-  Temporary grass and clover leys
-  Artificial unvegetated, unsealed surface
-  Native hedgerow
-  Ditch

Figure: 14A



0 75 150 m



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm


Drawing title

South Brooks A Baseline Habitats


Legend

 Development Areas

 Modified Grassland

 Non-cereal crops

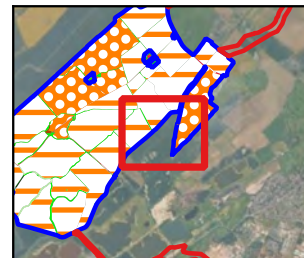
 Cereal crops

 Artificial unvegetated, unsealed surface

 Native hedgerow

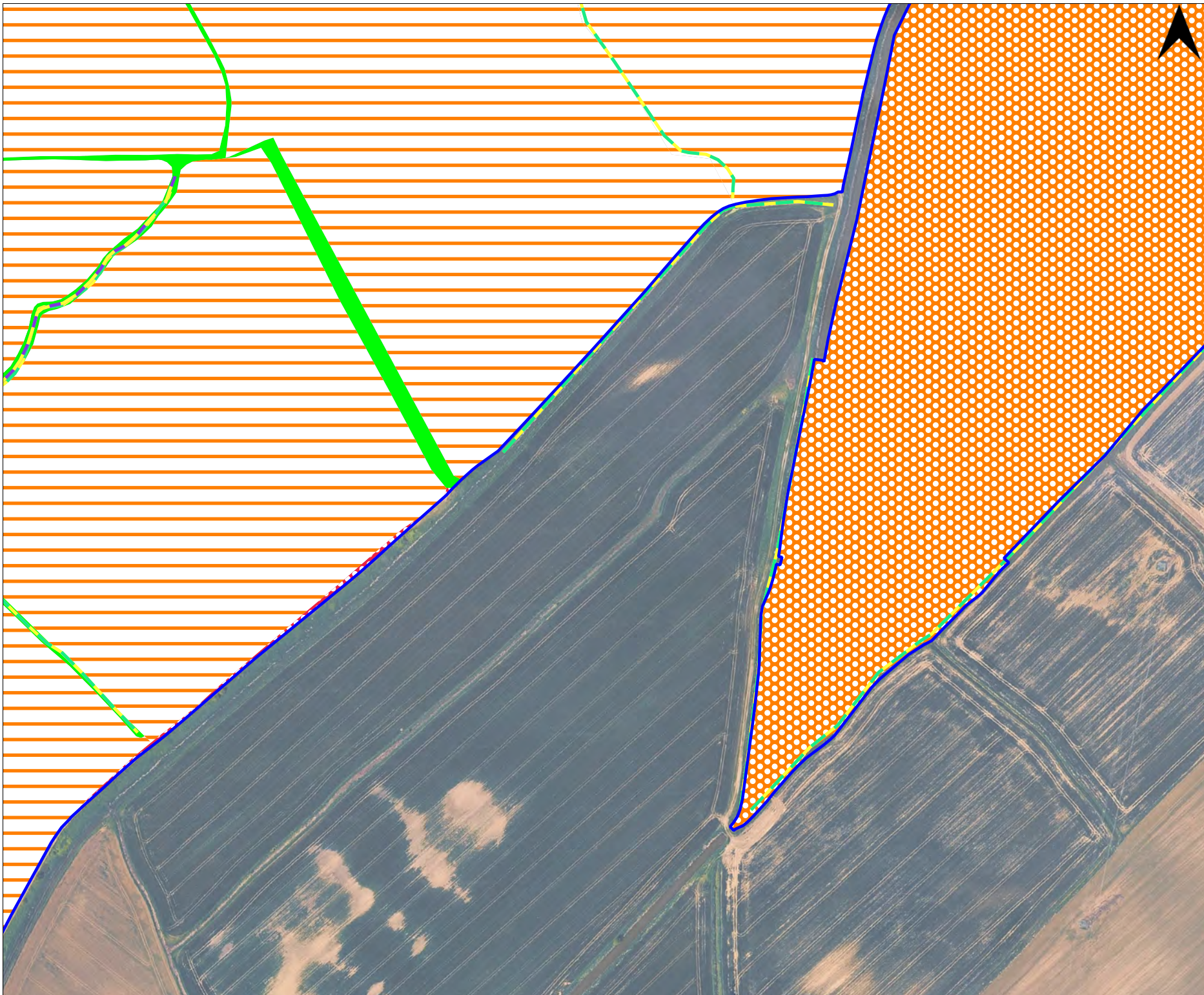
 Ditch

Figure: 15A



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks A Baseline Habitats

Legend

-  Development Areas
-  Other Neutral Grassland
-  Modified Grassland
-  Temporary grass and clover leys
-  Artificial unvegetated, unsealed surface
-  Built linear feature
-  Ditch

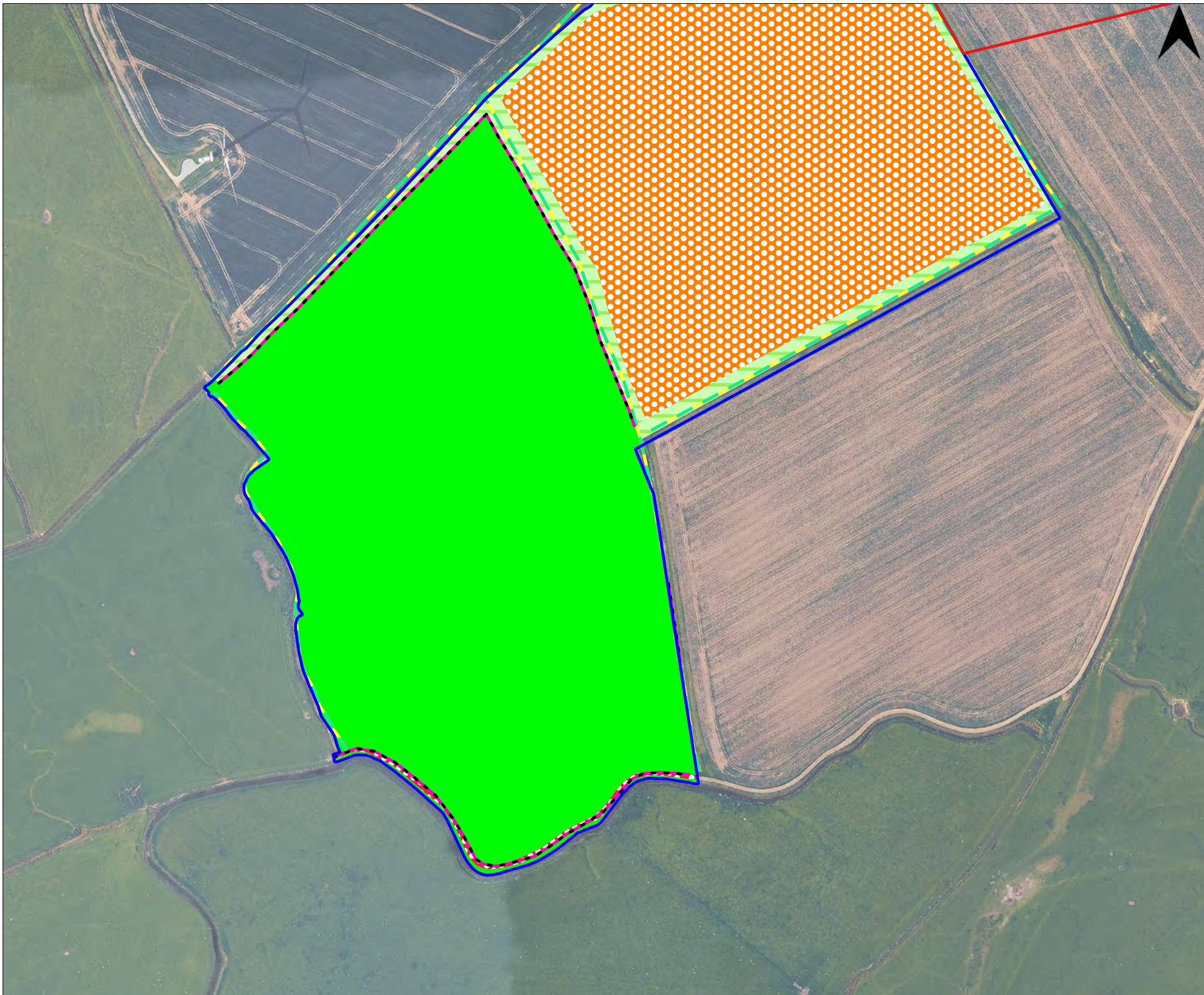
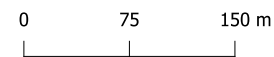
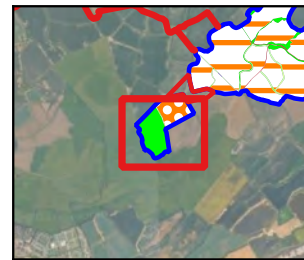


Figure: 16A



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

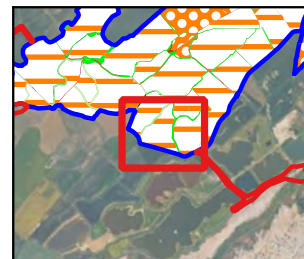
Drawing title

South Brooks A Baseline Habitats

Legend

-  Site Boundary
-  Development Areas
-  Hawthorn scrub
-  Other Neutral Grassland
-  Modified Grassland
-  Cereal crops
-  Developed land; sealed surface
-  Built linear feature
-  Ditch

Figure: 17A



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-10







Project/Location

South Brooks Solar Farm

Drawing title

South Brooks A Baseline Habitats

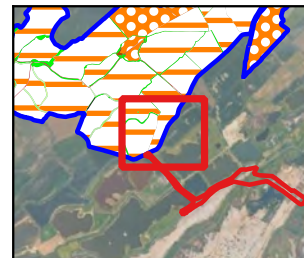
Legend

-  Site Boundary
-  Development Areas
-  Other Neutral Grassland
-  Modified Grassland
-  Cereal crops
-  Ditch



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Figure: 18A



0 75 150 m

Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks B Baseline Habitats

Legend

-  Site Boundary
-  Development Areas
-  Modified Grassland
-  Temporary grass and clover leys
-  Developed land; sealed surface
-  Ditch

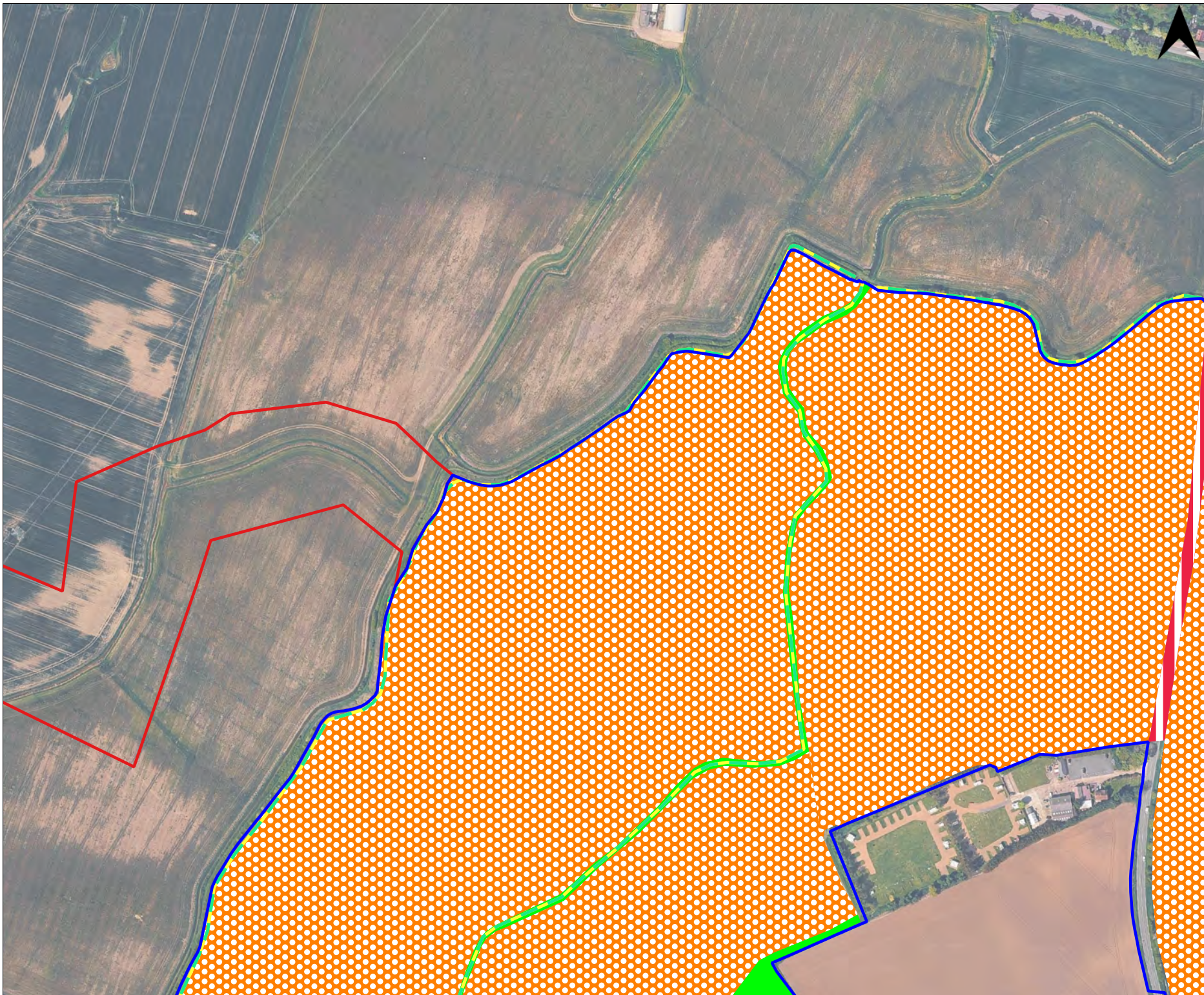
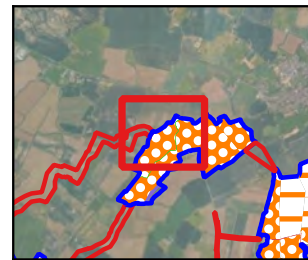


Figure: 1B



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks B Baseline Habitats

Legend

-  Site Boundary
-  Development Areas
-  Temporary grass and clover leys
-  Developed land; sealed surface
-  Line of trees associated with bank or ditch
-  Ditch

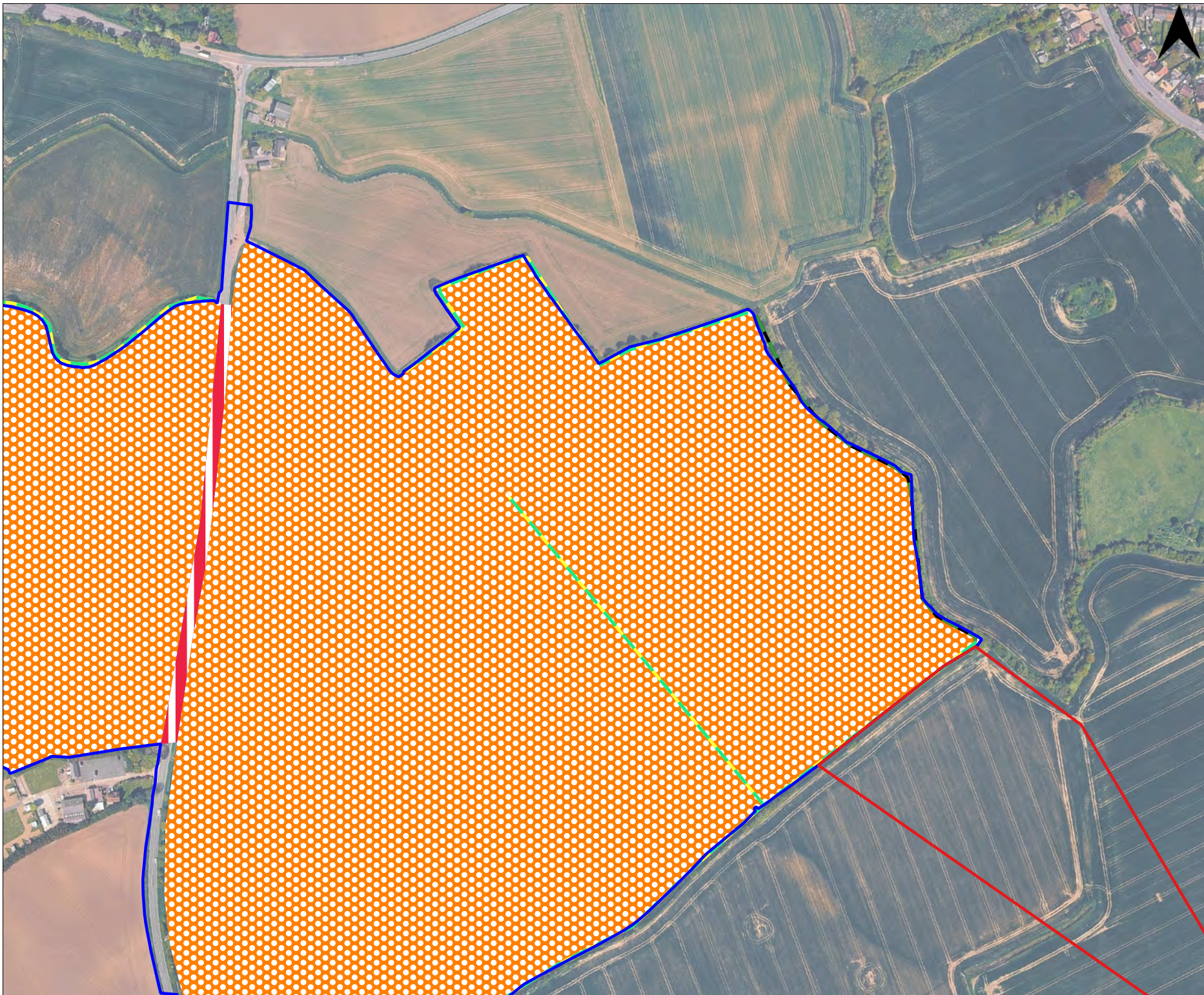
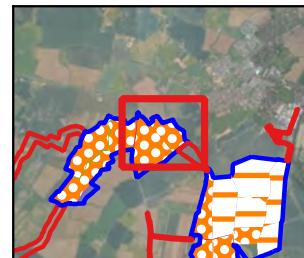


Figure: 2B



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks B Baseline Habitats

Legend

-  Site Boundary
-  Development Areas
-  Ponds
-  Mixed scrub
-  Modified Grassland
-  Temporary grass and clover leys
-  Ditch

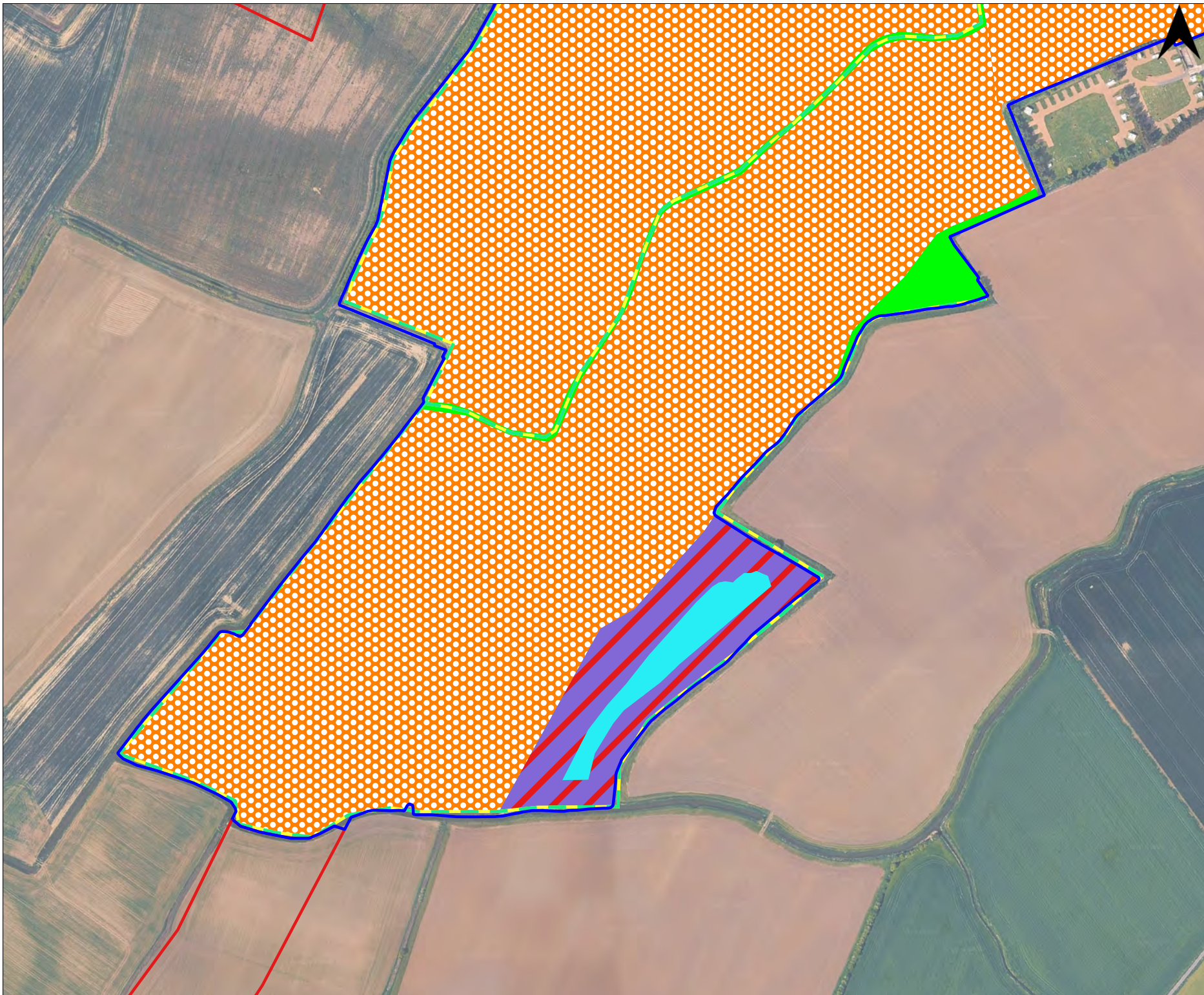
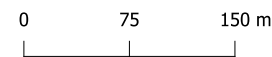
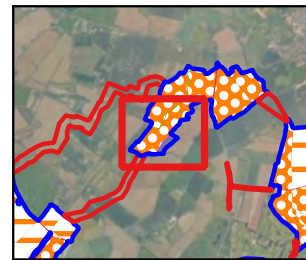


Figure: 3B



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

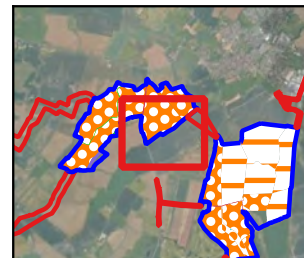
South Brooks B Baseline Habitats

Legend

-  Site Boundary
-  Development Areas
-  Temporary grass and clover leys
-  Developed land; sealed surface
-  Line of trees associated with bank or ditch
-  Ditch



Figure: 4B



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks C Baseline Habitats

Legend




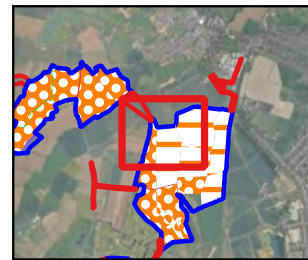
-  Site Boundary
-  Development Areas
-  Cereal crops
-  Temporary grass and clover leys
-  Line of trees associated with bank or ditch
-  Ditch



Figure: 1C



0 75 150 m

Drawing number

Figure 5-10






Project/Location

South Brooks Solar Farm

Drawing title

South Brooks C Baseline Habitats

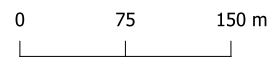
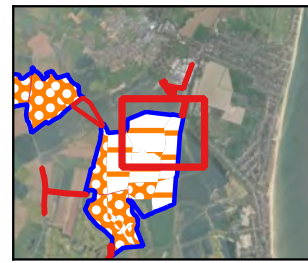
Legend

-  Site Boundary
-  Development Areas
-  Cereal crops
-  Line of trees associated with bank or ditch
-  Ditch

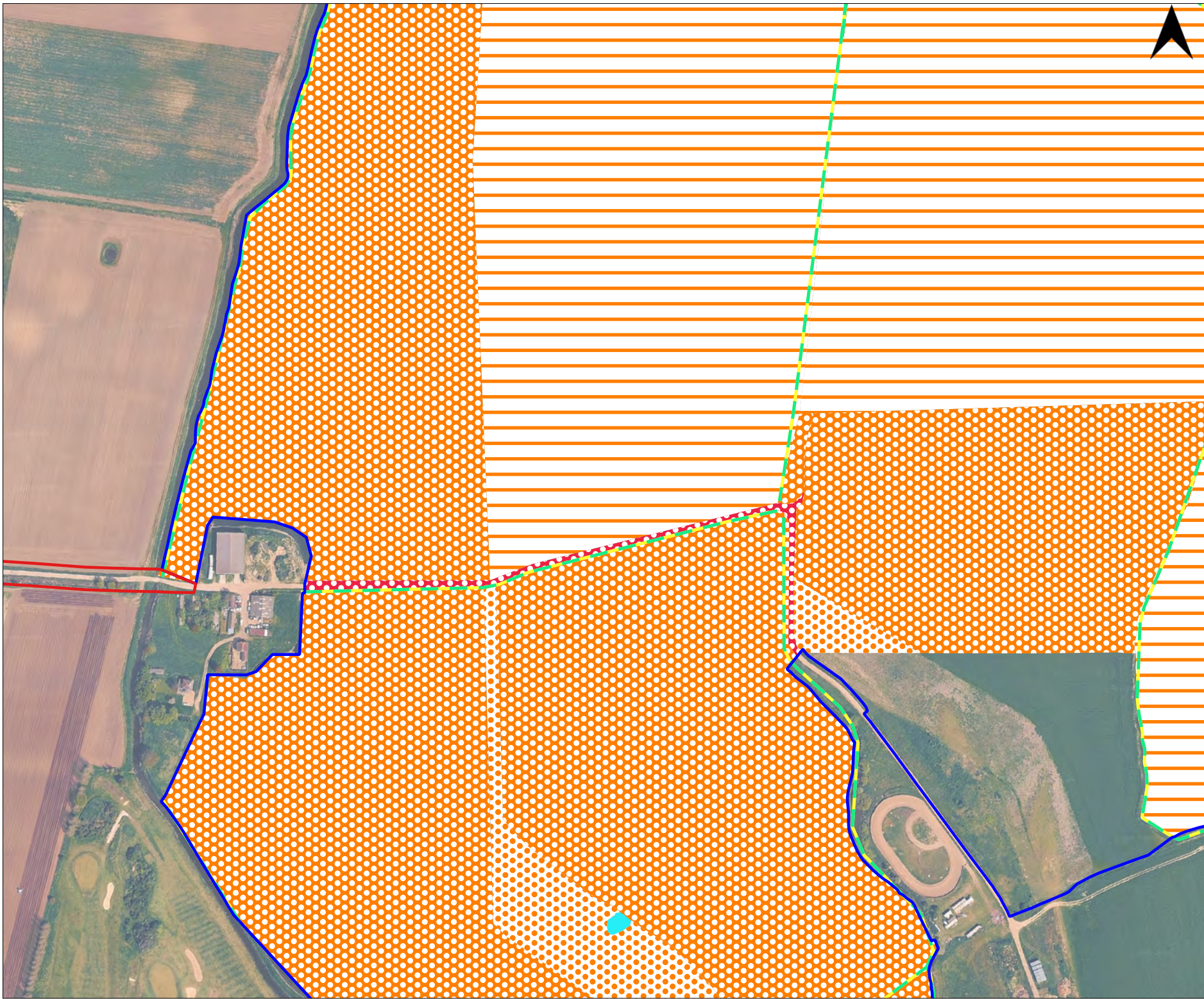


Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Figure: 2C



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

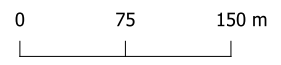
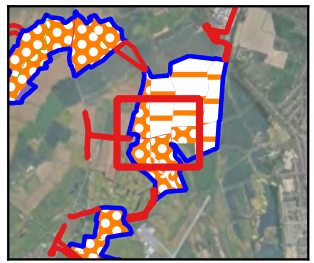
Drawing title

South Brooks C Baseline Habitats

Legend

-  Site Boundary
-  Development Areas
-  Cereal crops
-  Temporary grass and clover leys
-  Wild bird mix
-  Artificial unvegetated, unsealed surface
-  Ditch

Figure: 3C



Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

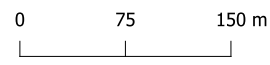
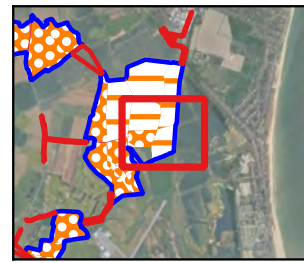
South Brooks C Baseline Habitats

Legend

-  Development Areas
-  Non-cereal crops
-  Cereal crops
-  Temporary grass and clover leys
-  Wild bird mix
-  Artificial unvegetated, unsealed surface
-  Ditch



Figure: 4C



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

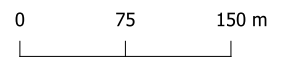
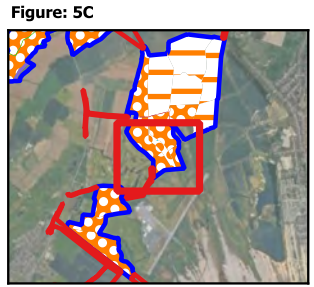


Drawing number
Figure 5-10

Project/Location
South Brooks Solar Farm

Drawing title
South Brooks C Baseline Habitats

- Legend
-  Site Boundary
 -  Development Areas
 -  Ponds
 -  Cereal crops
 -  Temporary grass and clover leys
 -  Wild bird mix
 -  Ditch



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

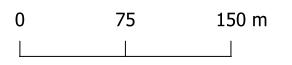
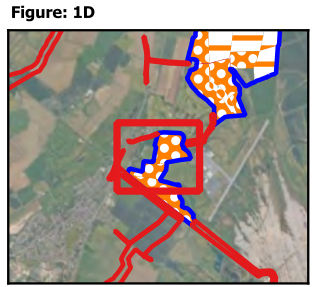


Drawing number
Figure 5-10

Project/Location
South Brooks Solar Farm

Drawing title
South Brooks D Baseline Habitats

- Legend
-  Site Boundary
 -  Development Areas
 -  Other Neutral Grassland
 -  Temporary grass and clover leys
 -  Artificial unvegetated, unsealed surface
 -  Line of trees associated with bank or ditch
 -  Native hedgerow
 -  Ditch



Drawing number

Figure 5-10






Project/Location

South Brooks Solar Farm

Drawing title

South Brooks D Baseline Habitats

Legend

-  Site Boundary
-  Development Areas
-  Temporary grass and clover leys
-  Line of trees associated with bank or ditch
-  Ditch

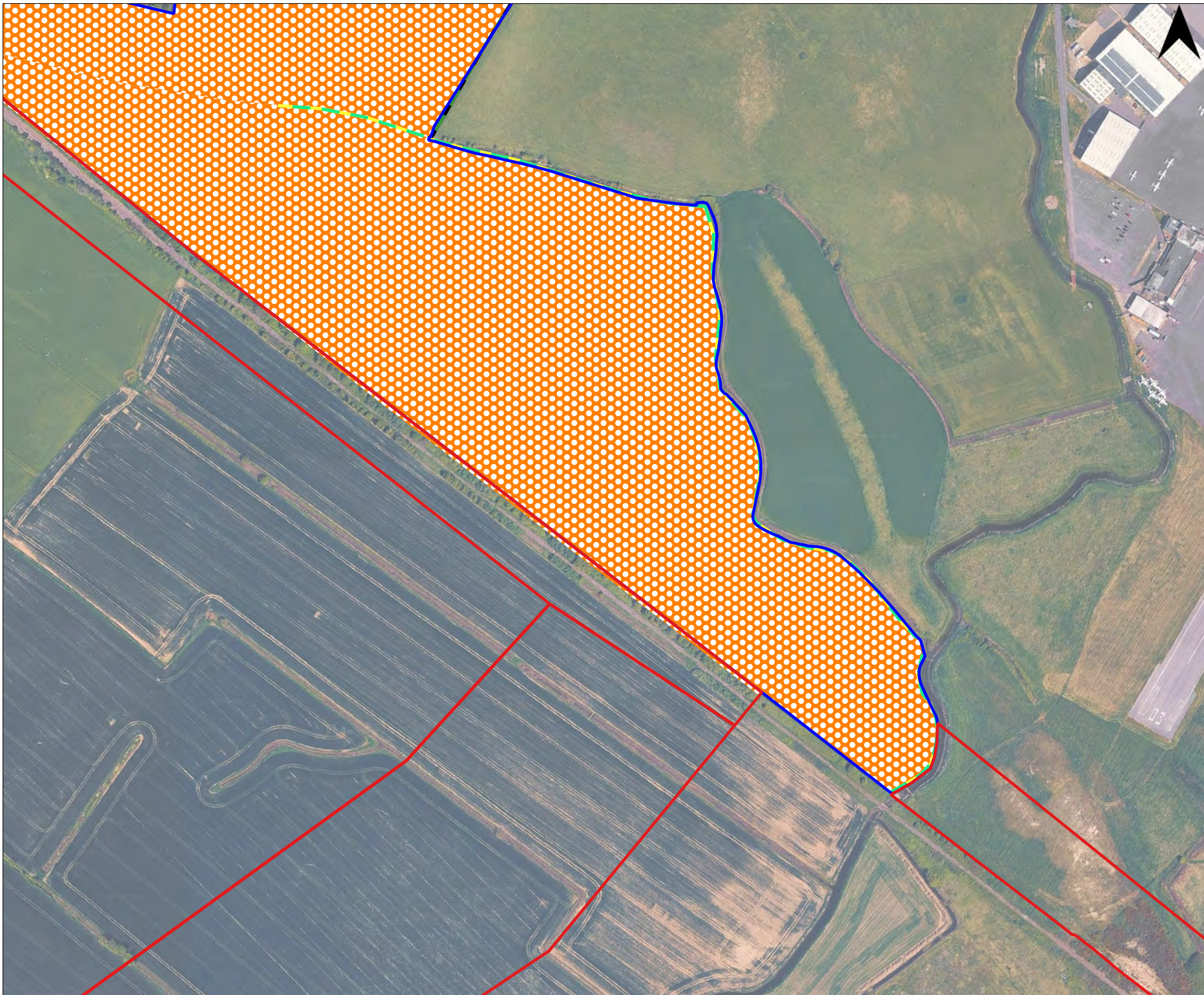
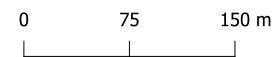


Figure: 2D



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks E Baseline Habitats

Legend

-  Site Boundary
-  Development Areas
-  Cereal crops
-  Ditch

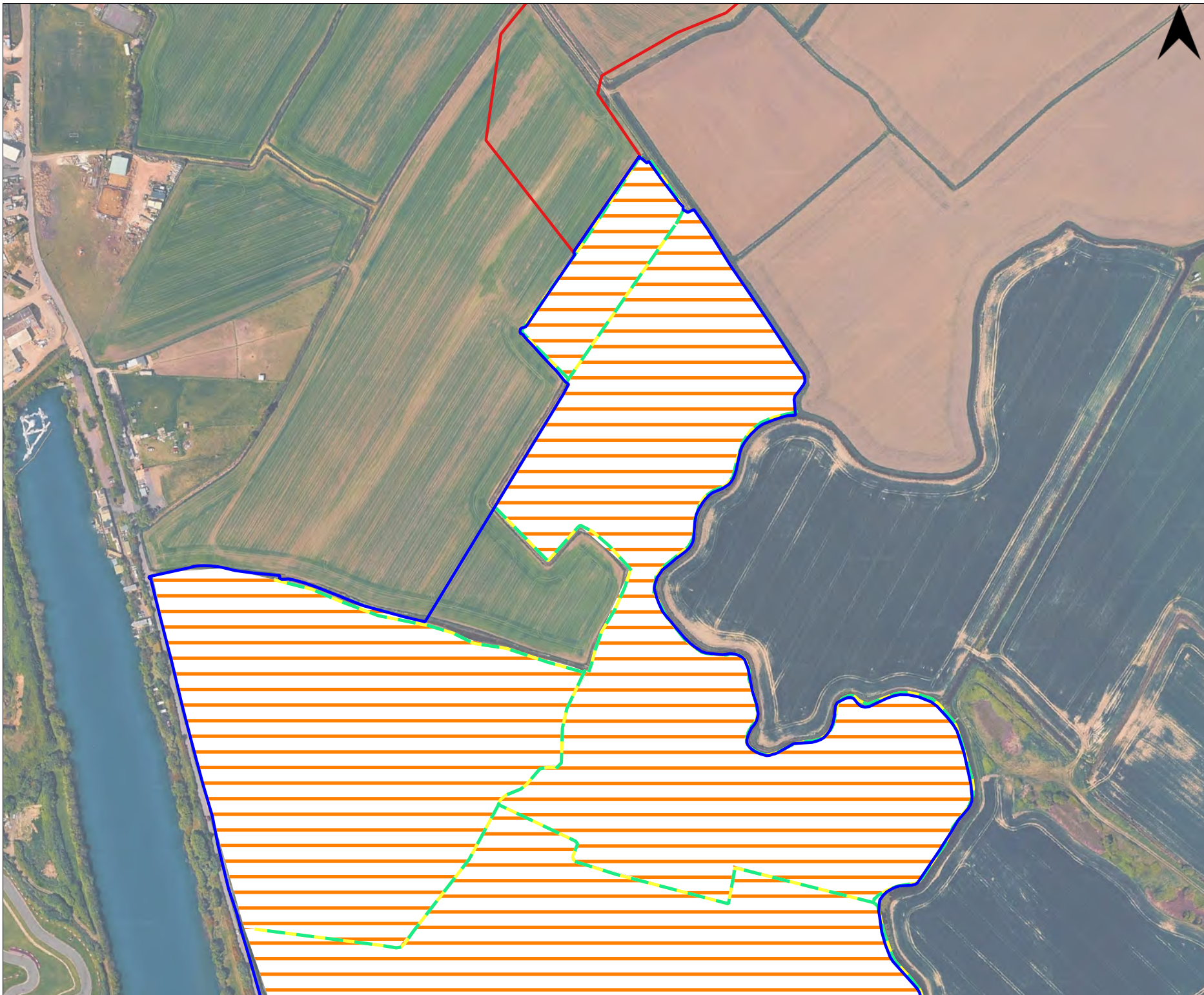
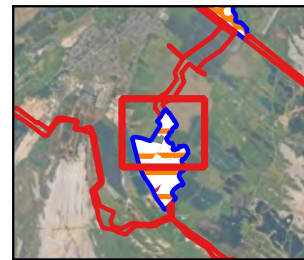


Figure: 1E



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing number

Figure 5-10

Project/Location

South Brooks Solar Farm

Drawing title

South Brooks E Baseline Habitats

Legend

-  Site Boundary
-  Development Areas
-  Cereal crops
-  Developed land; sealed surface
-  Ditch

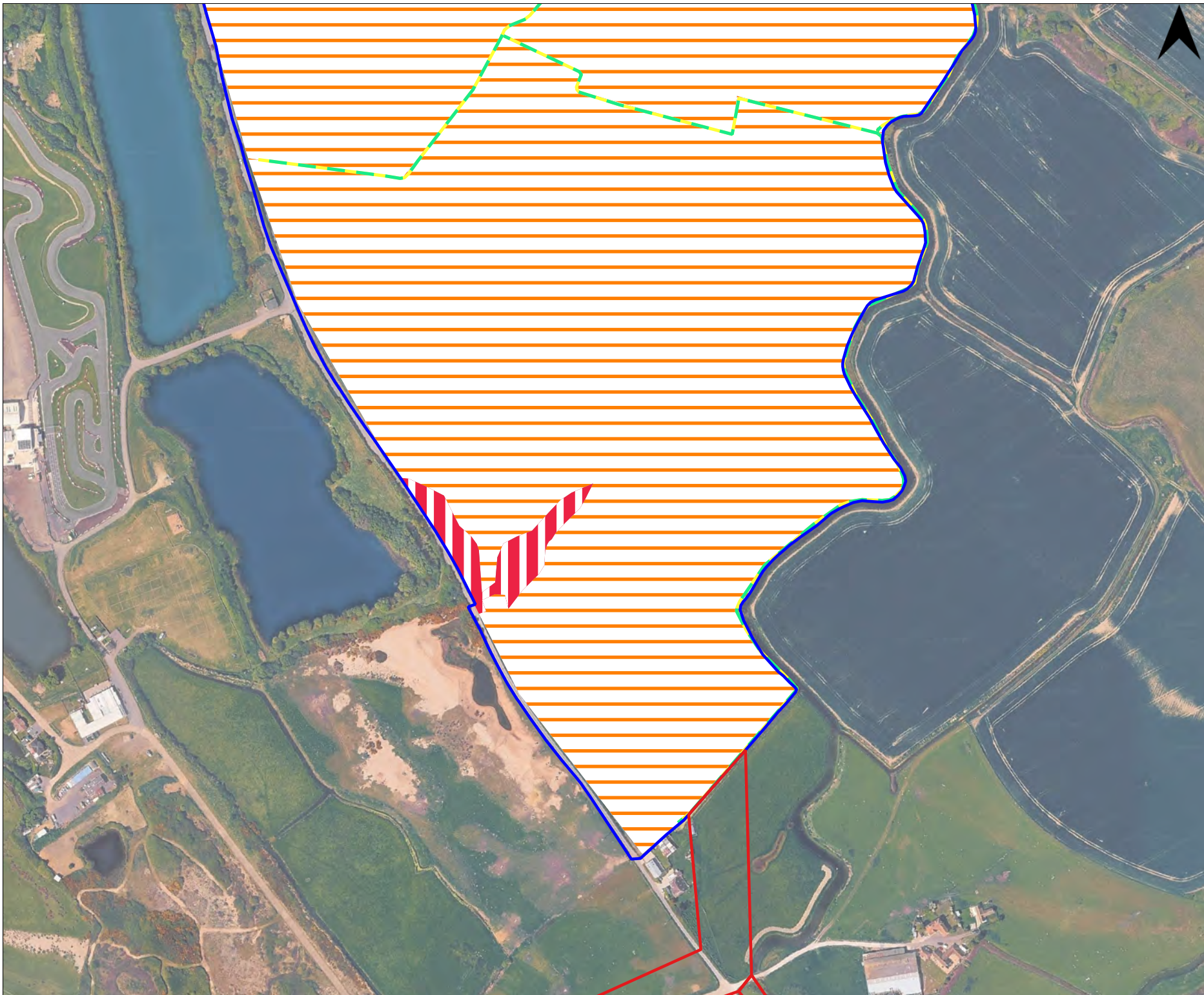


Figure: 2E



0 75 150 m

Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.

Drawing number

Figure 5-11



Project/Location

South Brooks Solar Farm

Drawing title

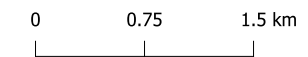
Bat transects and static monitoring locations

Legend

-  Site Boundary
-  Development Areas
-  Static Locations
-  2025 Transects



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.



Drawing number

Figure 5-12

Project/Location

South Brooks Solar Farm

Drawing title

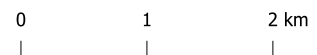
Legally controlled species identified via desk study

Legend

-  Site Boundary
-  Development Areas
-  2km buffer of Development Areas

Legally Controlled Species

-  American mink
-  Canadian waterweed
-  Giant hogweed
-  Japanese rose
-  New Zealand pigmyweed
-  Nuttall's waterweed
-  Three-cornered garlic
-  Wall Cotoneaster
-  Water fern



Drawing Notes: The site boundary is for indicative purposes only and requires confirmation on site.





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