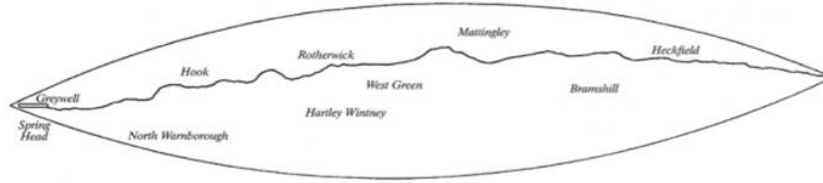


Whitewater Valley Conservation Society



To the Planning Enforcement Team enforcement@hart.gov.uk

TO WHOM IT MAY CONCERN

Bunkers Hill Farm

The following table outlines enforcement concerns in relation to the discharges of Condition No.13 - Landscape Management Plan 24/00243/CON and Condition No.7 - Whitewater River Protection 23/01246/CON pursuant to planning permission ref: 21/00552/FUL at Bunkers Hill Farm, Reading Road, Rotherwick, Hook RG27 9DA. We state concerns but they would appear to be breaches.

The LEMP accepts at 3. that JBM Solar Projects 18 Ltd are responsible for the implementation and execution of the plan and for maintaining the landscape and Buffer Zone elements. Furthermore at 3.1.5 it accepts that JBM will fulfil the landowner’s role and the work manager’s role.

The Ecology Officer approved the Discharge of the above Conditions “*providing the recommendations in the submitted (Landscape and Environment Management Plan and Buffer Zone Protection Scheme) are implemented I recommend that the condition can be discharged.*” and the Whitewater Valley Conservation Society would wish to highlight the following infractions by JBM Solar Projects 18 Ltd and / or their agents in the delivery of the conditions: -

LEMP (Con 13)	Notes
<p>Retained Landscape Elements 4.2.2 The River Whitewater bounds the site to the east and is to be retained and protected through a 12 m no development buffer zone. The river channel will be enhanced through the eradication of non-native species and planting of native species along the bankside habitat. Full details of enhancements and management of the buffer</p>	<ul style="list-style-type: none"> • There is no evidence of planting of native species along the bankside habitat

<p>and river habitat are included with the Buffer Zone Protection Scheme (CW20-785 R3). The Buffer Zone Protection Scheme also details protection and enhancements to the streams on site.</p>	
<p>Landscape Scale Habitat Creation 4.3.1. The Management Areas described within this document are shown on the Landscape Plan and include:</p> <ul style="list-style-type: none"> • Tree planting • Hedgerow planting • Woodland understorey planting • Wildflower meadow planting • Grass – solar park long term grazing mix planting. 	<ul style="list-style-type: none"> • Mature trees have failed and the planting is minimal at best and no watering is taking place • The hedgerow planting appears to have at best a 40% failure and no replacement is taking place • There is no evidence of any Wildflower meadow planting • There is no evidence of grass management in fact the damage to the grass areas is high
<p>5.2 Operations and services 5.2.1. The project owner will utilise local companies / labour to deliver the following services:</p> <ul style="list-style-type: none"> • All litter collection, lighting, and drainage systems. • Maintain the trees, planting, grass cutting, grounds maintenance. 	<ul style="list-style-type: none"> • There is no evidence of any maintenance of trees, planting, grass cutting or grounds maintenance • who is the company that have been appointed and have they provided the council with a works schedule to show complicity with Con 13?
<p>5.3.2. The success of the scheme is dependent upon the quality and frequency of the maintenance it receives during its lifetime</p>	<p>As above</p>
<p>5.3.3. During the first year after Practical Completion, the soft landscape will be maintained by the Landscape Contractor responsible for implementation of the works. The contract should include a defects liability clause to ensure replacement planting is carried out and successful establishment achieved.</p>	<ul style="list-style-type: none"> • Did the council receive evidence that the contract included a defects liability clause?
<p>6.3.4. Watering trees: Water trees during dry periods (being any period without substantial rainfall for 14 days or more),</p>	<ul style="list-style-type: none"> • We are in a dry period of 14 days without heavy rainfall. There is no evidence that watering is taking place and we can therefore assume there is

<p>until trees are successfully established. The Landscape Management Contractor shall be entirely responsible for varying the frequency of these visits according to climatic conditions and for contacting the landowner and agreeing the timing of any additional watering visits if required and where restrictions are placed on the use of water, sources and costs of obtaining second class water. The Landscape Management Contractor shall be responsible for any tree failures or excessive die back from drought stress during the management contract</p>	<p>no watering plan. This is a breach of Con 13.</p> <ul style="list-style-type: none"> • Consequently those trees and hedgerow that have been planted will fail
<p>6.4.4. Watering of hedges: Water hedges during dry periods (being any period without substantial rainfall for 14 days or more). The Landscape Management Contractor shall be entirely responsible for varying the frequency of these visits according to climatic conditions and for contacting the landowner and agreeing the timing of any additional watering visits if required and where restrictions are placed on the use of water, sources and costs of obtaining second class water. The Landscape Management Contractor shall be responsible for any tree failures or excessive die back from drought stress during the management contract.</p>	<p>As above</p>
<p>6.6. GRASS – SOLAR PARK LONG TERM GRAZING MIX <i>Planting Description</i> 12 6.6.1. A total area of 552,557m² will be proposed Solar Park Long-Term Grazing Mix. The mix will comprise mainly perennial ryegrass (<i>Lolium perenne</i>) with occasional fescue and white clover (<i>Trifolium repens</i>). The grassland is to be grazed by livestock. 6.6.2. The management objectives for the grassland areas are to:</p>	<ul style="list-style-type: none"> • There is no evidence of any sowing of any grass seed nor any evidence of any livestock grazing. • There is no evidence of any water supply for any livestock grazing any fenced area, which would indicate there are no livestock grazing any part of the site

<ul style="list-style-type: none"> • To ensure the satisfactory establishment of the grass sward; and • To maintain healthy and suitable grass areas, appropriate to function and use. <p>6.6.3 Either sensitive grassland cutting (up to twice per year to reduce shading of solar panels or tougher perennial weeds) and/or rotational livestock grazing will be utilised ensuring scrub and bracken distribution remains below 20% which will be checked in the monitoring visits. No pesticides or herbicides are to be used within this habitat.</p>	
<p>6.7. PROPOSED WILDFLOWER GRASSLAND <i>Planting Description</i> 6.7.1. It is proposed that Emorsgate EM2 Standard General-Purpose Meadow Mix is to be utilised in the field margins and open meadow areas of the site. The proposed meadow areas will total approximately 103,136 m². It is intended that these areas are maintained as ‘meadow’ and mowing is kept to a minimum. It will provide a suitable feature for invertebrates, foraging birds and bats. Fencing may be required to prevent intensive livestock grazing in the wildflower grassland areas</p>	<ul style="list-style-type: none"> • There is no evidence of any attempt to plant or manage meadow areas with wildflowers.
<p>6.7.3. Replacement of failed grass: Small areas showing signs of degradation shall be reseeded directly following the cutting. Seed with a wildflower seed mix, raking until the seed is a few millimetres below the surface. Water thoroughly and maint</p>	<ul style="list-style-type: none"> • This has not happened
<p>7.2.1. The Landscape Management Plan and maintenance schedules will be monitored and assessed for their</p>	<ul style="list-style-type: none"> • Is this information publicly available, even to the council?

effectiveness on an annual basis for the first five years following the completion of the facility.	
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Buffer Zone protection doc (Con 7)	Notes
<p><i>Neutral Grassland</i></p> <p>2.1.6. New meadow grassland planting is proposed between the river corridor and the site. The seed mix proposed is EM2 Standard General Purpose Meadow Mix to create a wildflower area of high value for biodiversity. In the first year of establishment the grass shall be mowed regularly to prevent weeds smothering the slower growing grasses. Allow for at least one cut a month from May to October. In the following years mowing of wildflower grass should be kept to a minimum. Allow for maximum of 2 cuts a year (June-July and September-October). All grass shall be mown with a rotary/flail mower. Delay cutting of grass in case of extreme draught.</p>	<ul style="list-style-type: none"> • It's just grassland – no meadow mix no wildflower grass and no cutting

The following photos of Bunkers Hill were taken on 3rd April 2025. March is a key land management month as outlined in the LEMP action plan actions should be taken on an annual basis in that month.



Showing no attempt at careful land management or reseeding



No sign of any form of management other than heavy construction





Showing the lack of watering and the lack of replacement of failed planting





Showing dead trees and a complete lack of grass management







No signs of wildflowers or meadow management or any advantage to the River Whitewater