

## **I would like to object to the proposed solar development on the specific grounds that the Skylark Mitigation Plan is inadequate,**

*I am writing as an individual but I am confident my objections would be shared with my members and endorsed by the organisation that I belong to.*

This proposal has been forwarded to my line manager within the RSPB organisation who has escalated it to the campaigns team. I am confident that this proposal would be of great concern to the RSPB.

In particular I object to the mitigation provision for the breeding Skylarks. To have an application for a species that is in sharp decline and on the highest list for concern using words like **acceptable, adequate and minimum** is a disgrace and makes the mitigation proposal **TOTALLY** unacceptable

These words are **not mine** they come from

**ECO02096-R-03b Berden Hall Farm Solar Farm Skylark Mitigation Strategy 2 09 November 2022**

This states:

**2.3** The survey site on which the RPS data was obtained is of comparable habitats (arable fields) in a predominantly arable landscape and therefore is considered to represent an **acceptable measure** of Skylark densities at Berden Hall Farm.

**3.14** It can therefore be confidently stated that the proposed skylark plots will be **adequate to** mitigate for **estimated** losses of Skylark territories on site

***These two sentences make it clear that the numbers of AFFECTED Skylarks are not accurately known. The number of Skylarks that this land could support if farmed in a Skylark friendly way is also NOT KNOWN.***

***With a seriously endangered species stopping the decline is not good enough the proposal needs to address the reversibility of the decline***

The document also states:

**3.2** Skylark plots are created in accordance with Countryside Stewardship management practices as set out in AB4: Skylark Plots which states

During the autumn/winter fallow plots will be created within the winter cereal crop. There will be a **minimum of 2 plots per ha** and each plot will be at least 3 metres (m) wide and will have a **minimum area of 16 square metres**. These plots will be retained until the crop is harvested.

***Given the proposal is basically 64 hectares and the government document states there will be 2 plots per hectare the provision should have 128 plots. The mitigation strategy calculates the provision based on lost plots. This calculation appears to be totally incorrect – AB4: Skylark Plots is solely area of land divided by.***

***This means the proposal is 92 plots less than it should be.***

In addition, AB4: Skylark Plots ***does not appear*** to state where the plots should be located.

To me it appears that there is a reasonable chance that they may find Field 1. I think it is very unlikely that they would find Field 2 as it is located at a considerable distance from the solar farm. It would appear to me that the only consideration for Field 2 is ownership of land

The view of this proposal being ***unacceptable, inadequate and meeting only minimum requirements*** is concurred by the following organisations

#### **Environmental Agency**

*An ornithological specialist at the Environmental Agency explains that skylark nesting plots need to be much bigger and more numerous than is indicated in Staterra's Skylark Mitigation Strategy document:*

#### **RSPB**

*'The RSPB offers clear guidance for the creation of skylark plots: "Aim to create roughly two hundred skylark plots per square kilometre across the winter cereal area. Research suggests the skylark decline would be reversed if 20 per cent of winter cereals in the UK had **two hundred plots per square kilometre.**"'*

For me the key words in the RSPB statement are **reversing the decline** at 200 plots per square kilometre this equates to 128 plots- far more than the proposal.

With the catastrophic state of British nature and its continued serious decline within a context of national measures to reverse the trend the provision as proposed falls far short of what is required.

I am seriously concerned about the absence in the proposal of any consideration in the proposal about how much biodiversity and abundance of species could be achieved if this land was farmed using sustainable and nature friendly methods. The RSPB Hope Farm project has been an outstanding success and proved that commercial farming considerations are not compromised.

To conclude my objection, I return to the following section of the AB4: Skylark Plots document.

### **How this option will benefit the environment**

*It provides skylarks with suitable access to nesting habitats in winter cereal crops throughout their breeding season.*

***If successful there will be:***

- *plots providing access into the growing cereal during the spring and summer*
- *skylarks holding territory and singing over the fields of winter cereals where the plots are located and, ideally, landing in the plots themselves*
- *increased numbers of singing skylarks across the farm*

The key word is **IF** and I have serious concerns about the proposed mitigation provision.

- It is not known how many Skylarks are affected
- The amount of Skylark plots provided is substantially short of government and expert guidance.

- The location of Field 2 is at such a distance that there is a considerable doubt that they will be used. If this happens the mitigation provision is close to 18 plots (Field 1). A further serious reduction in provision.
- The Skylark provision is considerably short of the requirement to contribute to reversing the species decline.

I consider it extremely unlikely that the above success criteria be met with this proposal. The decline and protection of a seriously endangered species cannot and should not be treated in this way.

I therefore object to this proposal in the strongest of terms and it should not be approved.

Yours sincerely

**Martin Swanzy**

**RSPB MEMBER Stort Valley Local Group**

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