

**From:** Katherine Armstrong [REDACTED]

**Sent:** 01 December 2023 16:10

**To:** Section 62A Applications <section62a@planninginspectorate.gov.uk>

**Cc:** [REDACTED]

**Subject:** S62A/22/0006 - Development of a ground mounted solar farm, Land at Berden Hall Farm, Dewes Green Road, Berden

[REDACTED]

Dear Planning Inspector,

I am writing to object once again to the proposed development, Berden Hall Solar Farm, and specifically to provide a supplementary update to the letter I submitted to PINS in 2022 objecting to the application on ecology grounds.

As I am sure you are aware, further research into the impact of solar developments on skylark and other species of principal importance has been published since the application was first considered, and I wish to highlight this research so it can be weighed in the planning balance when determining this application for the second time.

In a talk titled 'Solar and Ecology' given to the Solar Campaign Alliance on November 20<sup>th</sup> 2023, Elizabeth Hamilton of CPRE Hertfordshire noted that not a single skylark nest has ever been recorded among solar arrays in the UK.

Ms Hamilton referred to [ground-breaking research published by Harry Fox in a recent CIEEM Bulletin](#) in which the author pointed out that skylark mitigation is both unenforceable and not guaranteed to work. Metrics typically used to calculate skylark mitigation plots are questionable, according to Fox, and it is likely that far more plots are needed to compensate for loss of habitat than is generally allowed. This certainly applies to the current application, which makes wholly inadequate provision for a significant loss of habitat - **providing c. 28 plots of a few square metres each off-site cannot possibly compensate for the loss of 177 ha**. Moreover, research shows that mitigation plots are subject to high rates of predation (Morris and Gilroy, 2008).

As I am sure you know, all these factors lead to poor outcomes for skylark where developments are permitted on the assumption that mitigation plots can compensate for habitat loss. It is worth recalling that the concept of mitigation plots originated with the RSPB and that they were designed to provide compensatory foraging opportunities for birds impacted by changing farming practices. Mitigation plots were never intended as nesting sites and probably never can, since skylarks exhibit high nest-site fidelity. Moreover, as Elizabeth Hamilton points out, any such land, if suitable for breeding skylarks, would be colonised by other pairs already, hence mitigation plots cannot be relied on to support additional displaced populations and are very unlikely to do so.

You will be aware too of the planning decision by Mr Callum Parker in May 2023 with regard to Pelham Spring Solar Farm, in which Mr Parker stated that it was unclear how provision would be made for skylark and other impacted species of principal importance if the development were approved. This was one of the grounds on which Mr Parker declined the application.

Finally, I would like to reiterate that Peter Allen, the leader of the RSPB Bishop's Stortford Group, kindly made a site visit to the fields proposed for Berden Hall Solar Farm in February 2023, and confirmed the presence of many pairs of skylark. He expressed deep dismay at the potential impact on this population, and several members of his group followed his lead in writing to object to the

proposal. Mr Allen has continued to show a keen interest in this matter and I am therefore copying him into this email.

I am aware of the heritage assets threatened by this application, the potential adverse impact on PROWs, landscape and visual amenities, and many other factors besides. These are individually and collectively strong reasons to decline the application. However, I hope you will also take into account the dire state of nature in the UK, the fragility of many species populations and the iconic status of skylark in the English countryside, and consider that protecting this vulnerable species is grounds to reject this application, not least because skylark mitigation is impossible to guarantee and even more impossible to enforce.

Yours faithfully,

(Dr) Katherine Armstrong