

I'm Katherine Armstrong, a Berden resident and a long-term member of the RSPB.

I consider the harms to biodiversity outweigh the benefits of the proposed development, which will adversely affect several protected species and a red-list bird.

My objection is fully supported by both the RSPB and the Stort Valley RSPB Local Group. The local group strongly opposed the Application by submitting a significant number of objections and their position remains unchanged.¹

A large active badger sett lies within a few metres of the boundary line. The driving of around half a million piles in close proximity is bound to disturb these badgers, which as the Inspector will be aware some local authorities insist on safeguarding with a 30-metre buffer zone. Post-construction, security fences will disrupt their foraging and commuting routes—the Site is heavily used by dog walkers and in practice small mammal gates will have to be kept locked to stop dogs getting in.

At least three species of bat are recorded on and close to the proposal Site.² At Llanwern Solar Farm in Wales there has been a 95-100% reduction in bat activity post-construction.³

The Site is home to breeding pairs of Skylark, a red-listed bird and UK Biodiversity Action Plan Priority species. Skylark will not nest within 25 m of a tall structure, which explains why there are no recorded examples of Skylark nesting among solar arrays in the UK. Regardless of the unilateral undertaking from the landowner, the mitigation proposed by the Applicant is inadequate for reasons already highlighted by Berden Parish Council. In summary, Skylark mitigation plots were designed by the RSPB to provide compensatory foraging for birds impacted by changing cereal-farming practices.⁴ They do not work as nesting plots.⁵ Skylark exhibits strong nest site fidelity⁶ and research shows it will not shift from its existing territories, not least because suitable nearby sites will be colonised already, with no room for newcomers.⁷ There is a likelihood that the solar farm will cause local extinction of this species.⁸

The Applicant's other mitigations are equally problematic. Amenity hedging takes at least 12 years to mature, and cannot compensate for loss of existing habitat, arable farmland being

¹ Peter Allen, RSPB Stort Valley Group Leader, personal communication to Katherine Armstrong, March 17 2024.

²

https://assets.publishing.service.gov.uk/media/63a1864ad3bf7f375f7c436b/Berden_Hall_Fm_SF_ES_Appx_7.1_Desk_study_and_habitat_survey_Redacted.pdf

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[REDACTED]

⁴ <https://www.gov.uk/countryside-stewardship-grants/skylark-plots-ab4>

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⁷ Elizabeth Hamilton, 'The most important ecology issues in applications and appeals for solar power developments,' presentation to the Solar Campaign Alliance, 20 November 2023.

⁸ Skylark has probably nested here for centuries since these fields were not Enclosed until the mid- to late-nineteenth century and they remain large, open and relatively lacking in tall vegetation. Gillian Burke notes local extinction of a ground-nesting bird, Lapwing, at Llanwern Solar Farm since construction. Gillian Burke, 'How far are we willing to go for convenience?' *BBC Wildlife Magazine* March 2024, p. 21.

increasingly recognised as important to many native species⁹ including Brown Hare, Harvest Mouse and Barn Owl which are present on or near the Site. Wildflower meadows are notoriously tricky to establish, being overtaken by dominant grass species without careful management.¹⁰

In summary, the development is intended to help solve the climate crisis while it ignores the nature crisis.¹¹ But as Gwent Wildlife Trust puts it, 'You can't destroy the environment to save the environment.'¹² I therefore urge you to refuse the application.

⁹ Hamilton, *ibid.*

¹⁰ Claims that solar farms lead to Biodiversity Net Gain are not borne out by evidence. See, for example,

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¹¹ Gillian Burke, *ibid.*

¹² [REDACTED]

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