

Stonestreet Green Solar Project

Planning Inspectorate Reference: EN010135

Deadline 4 Written Summary of Oral Representation by

CPRE Kent

Unique Reference Number: 20035769

1.0 Summary of CPRE Kent's Written Representation.

- 1.1. CPRE Kent, and indeed CPRE nationally, fully supports the UK's transition toward clean energy though believes this transition cannot come at the cost of our landscape, food security or rural communities.
- 1.2. CPRE has therefore been campaigning hard for solar to be on rooftops and brownfield sites rather than on green fields and agricultural lands. A rooftop-first approach would allow us to protect land needed for food, housing, nature and energy, all without industrialising our countryside.
- 1.3. A summary of our concerns is as follows:
 - The breeding bird survey is suboptimal and could therefore have missed several key species known to be on site.
 - The Skylark mitigation is highly likely to fail in its current format and other proposals are not fit for purpose.
 - The BNG metric has errors, rules and principles not met and seemingly plays down the value of the habitat on site.
 - There is no need for any lighting on site once the solar farm reaches operational phase.

1.0 Introduction

- 1.1 CPRE Kent welcomed the opportunity to provide oral evidence at the fourth open-floor hearing held on 25th February 2025.
- 1.2 CPRE Kent is the local branch of CPRE (Campaign to Protect Rural England), the countryside charity. Throughout Kent we represent 1,450 individual members, of which 173 are parish councils, local amenity groups and civic societies.
- 1.3 CPRE Kent is an independent charity that works closely alongside other CPRE branches, as well as the national CPRE organisation.
- 1.4 It is our objective to retain and promote a beautiful and thriving countryside that is valued by everyone. It is our position that planning decisions should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.

2.0 Biodiversity and ecological comments

2.1 Environmental statement Volume 4. App 9.5 Breeding bird survey

- 2.2 Only four breeding bird survey visit days were carried out. The recommended survey visit days are six. Furthermore, all survey timings were after sunrise, sometimes two hours after sunrise. The recommendation is that surveys begin half an hour before sunrise, and half an hour after sunrise and be concluded by 10am to 11 am.

- 2.3 We are also concerned that no consideration has been afforded to species that typically are active earlier in the morning and later in the morning after the dawn chorus has ended, with other breeding birds singing after sunset. There was no variation at all in the timings of the bird surveys, except for one survey specifically for Nightingales. Any birds active after sunset were completely disregarded and therefore not accounted for at all. It is recommended that out of the six visits at least one should be conducted in the evening and extend beyond sunset. Certain species call after dark, such as Robin, Grasshopper Warbler, Nightjar and several owl species including Barn Owl. Therefore, we find the breeding bird surveys extremely limiting, not only in terms of number of visits conducted but also timings - this is especially concerning for a large site such as this. It is highly likely that the records would have omitted key species from the bird assemblages and thus the biodiversity importance of the assemblage is likely to be underrated and suboptimal.
- 2.4 Several raptors have been recorded and confirmed breeding on site, including buzzards and kestrels. These birds of prey require wide open spaces such as farmland in which to hunt. If vast areas are covered in glass, their hunting opportunities will be severely limited and they may end up being displaced from the area. This needs to be considered.

3.0 Skylarks

- 3.1 Since the 1940s there has been a decline of 1.6 million Skylarks in 2016 from the 1940s where there were estimated to be 4 million pairs. The decline in Skylarks has been attributed to agricultural intensification; however, the more recent phenomenon of solar farms removing any opportunities for nesting territories will highly likely to have a profoundly negative effect, it is too early to say for sure.
- 3.2 Skylarks have been found widely across the whole site. The mitigation proposal is to offer fields 26-29 for Skylark territories. Each pair requires approximately 0.25 Ha to 2 Ha. It is questionable whether fields 26-29 offer enough space to accommodate all of the potential Skylark territories.
- 3.3 Furthermore, it is suggested that a new footpath runs through the Skylark mitigation. This is problematic due to the high possibility of recreational disturbance from people and their dogs flushing the Skylarks and triggering a flight response. Not only could this result in pairs abandoning their nesting sites and any potential eggs or chicks but it could also result in leaving the Skylarks vulnerable to predation. Therefore, for any meaningful mitigation to have a chance of success, the footpath would need to be redirected away from the area.
- 3.4 Skylarks require wide open areas and thrive in open farmland settings, being ground-nesting birds where they can monitor predatory activity but at the same time remain hidden from view. Therefore, any suggestion of placing Skylark plots among the panels demonstrates a misunderstanding of the requirements of this species. However, it may be conceivable, during the operational phase, that Skylark territories could be added to the buffers around the edge of the arrays but not in between and if a dark-sky policy was adopted.

4.0 BNG

- 4.1 According to the last BNG metric submitted, there were input errors/rules and principles not met. These need attention.

Unit Shortfall by Tier/Module	
Tier	Unit Shortfall
A1	0.00
A2	0.00
A3	4.95 ▲
A4	0.00
A5	0.00
H	0.10 ▲
W	0.00

4.2 While we appreciate BNG is not mandatory in this case, we find it difficult to believe that a large site such as this has no hedgerow assessed as in good condition throughout and they are all assessed as either 'poor' or 'medium' in condition. The same can be said of the assessment of watercourses on site; none of them are assessed as good - they are all 'poor' or 'moderate' within the metric. In fact, with the exception of other neutral grassland between fields 10 and 11, which has been assessed as 'good', all other habitat is assessed as either 'poor' or 'moderate' condition. We find this surprising on such a large site.

4.3 The BNG is further confused by the applicant's apparent indecision on how to manage the grassland, by grazing or wildflower seeding or a combination of both, *ie* grazing through the winter months. This needs clarification as any future management proposals are likely to make a significant difference to the BNG calculation.

5.0 Lighting

5.1 We are seeing planning applications coming through for solar farms where there is no lighting proposed during the operational phase. With today's modern security cameras, there should be no requirement for lighting. The redline boundary currently covers areas of dark tranquillity and we feel this tranquillity should be protected. Artificial light at night (ALAN) is a known biological disrupter of wildlife and flora, especially bats, amphibians and invertebrates, and there is no justification to light any area of the solar farm at night.

5.2 Ashford adopted a dark-sky policy in July 2014 and the policy states the following:

'Obtrusive light in rural locations can affect the natural diurnal rhythms amongst a wide range of animals and plants. Light trespass is a common problem and can intrude on the residential amenity in both urban and rural settings causing stress and anxiety for people affected. In addition to these specific problems, obtrusive light represents a waste of energy, resources and money.'

5.3 Below we have listed examples of solar farms that have no lighting proposed.

- Flaxland Solar Farm in Royal Wotton Bassett, a 49.9MW generating capacity with 49MW BESS.
- Whitney Solar Farm at Brize Norton, 30MW generating capacity with 30MW BESS.
- Ash Solar Farm at Coleford, 3.8MW generating capacity with 10MW BESS.

6.0 Summary

- 6.1 We feel that the Breeding Bird Survey needs to cover the times of day we outline above and meaningful mitigation proposed for those species adversely affected.
- 6.2 The footpath proposed to run across the Skylark mitigation needs redirecting away from the mitigation. Any territories amongst the panels should not be accepted as meaningful mitigation.
- 6.3 If the applicant offers BNG, then the metric should at least be correct when submitted and the habitats on site should be assessed accurately and not under-evaluated to artificially inflate the BNG gain.
- 6.4 No lighting during the operational phase should be proposed, which would comply with Ashford's dark-sky policy and minimise disrupting the tranquillity of the area for the flora and fauna and for the residents.