

## **Annex to RSPB letter dated 19 July 2014**

**Re: application no. 14/00645/FUL: “Saundby Wind Farm”**

### **Detailed comments on the Environmental Statement**

This annex contains detailed comments on parts of the Environmental Statement (ES) for Saundby Wind Farm which may help the Local Planning Authority as it considers the ecological and landscape issues raised by this proposal. These include minor corrections of fact and interpretation but in our view do not require any planning condition or undertaking by the applicant. Comments are presented in chapter order. These are *in addition* to the main points in our letter: we have not duplicated comments made there.

### **Chapter 3 – Scheme development and scoping the Environmental Statement**

Table 3.2 (p3-11) does not accurately or fully convey the contents of our letter of 17 May 2011. The Local Planning Authority will have a copy of this on file and in case of doubt we ask you to refer directly to it.

There is a discrepancy in the proposed stand-off distances between construction activity and barn owls (nest sites or roosts). In Table 3.2 the figure of 100m is stated. In Table 12.9 (Chapter 12 – Ornithology) the figure proposed is 50m. The actual proposed distance needs to be clarified. Our advice is that 50m separation between construction activity and a potential barn owl nest site is far too low for the applicant to be sure they will avoid committing an offence under the Wildlife & Countryside Act 1981 (as amended), and even 100m may be questionable – there is a huge difference between one or two fieldworkers walking briefly near a nest site, and prolonged large scale industrial activity, in terms of disturbance potential.

### **Chapter 4 – Description of the proposed development**

The RSPB welcomes the commitment to bridge, rather than culvert, any necessary crossing points for drains (paragraph 4.7.45).

We also welcome the proposal to preserve a 6m buffer between the access tracks and the edges of any watercourses, as a measure to mitigate impacts on wildlife.

### **Chapter 9 – Landscape and visual**

While we have not commented on this matter, we welcome the inclusion of viewpoint 15 (the visitor viewpoint at Beckingham Marshes nature reserve) and the appraisal of landscape and visual impacts from this location.

Public rights of way and access (paragraph 9.4.21 onwards). While levels of use are relatively low, the RSPB provides visitor access to our reserve along a trail to a viewpoint (the location used for Viewpoint 15). “Visual receptors” (i.e. people) do use this trail: it is not simply an impact on landscape. As far as we can see, this has not explicitly been noted anywhere in the ES. The section on Visual Receptors (pp9-62 to 9-65) would be the appropriate place to do so.

Table 9.11, p9-60 (viewpoint data) and Table 9.12, p9-77 (magnitude of change for viewpoints assessed). For the record, the visitor trail and “lookout point” at Beckingham Marshes nature

reserve have been open since 2013. The RSPB has no current plans to develop a visitor centre at the site separate to the facilities already provided by the Willow Works.

## Chapter 12 – Ornithology

While we welcome the applicant's agreement to provide off-site enhancements to habitats for breeding waders (notably, electric anti-predator fencing and creation of further swales and ponds on Beckingham Marshes nature reserves), the justification for this has not been particularly well-explained in the ES. The following clarification may be helpful.

In early discussions with the applicant, the RSPB asked for a separation distance of 400m to 500m to be kept between the closest wind turbines and the nature reserve boundary. This was based on recent research<sup>1</sup> on disturbance and displacement effects of wind farms in upland environments, on breeding curlews, golden plovers and other waders. Unfortunately, no similar research has been done on the effects of wind farms on breeding waders of lowland wetland environments, so all parties are forced to rely on this upland research and must acknowledge a degree of uncertainty in drawing any parallels.

The applicant's final design choice places wind turbine WT1 around 380m from the southern edge of the nature reserve. While this is inside the 400m to 500m buffer we originally asked for, other factors we have to take into consideration include the fact that that WT1 is separated from the reserve by the A361 and a line of mature trees and scrub, and that part of our reserve that would otherwise be suitable for breeding waders is already "under the shadow" of the high voltage electricity line and pylons. The electricity cables and the tree-line almost certainly already have some disturbance/ displacement effect on breeding waders.

So, there are some uncertainties on both sides about exactly what the disturbance/displacement effects of WT1 and the other wind turbines might actually be. There is a risk (which is low, but not zero) that the presence of WT1 in particular could slightly reduce the number of breeding waders (especially curlews) we might attract to nest. This risk must be coupled with the much higher likelihood that large parts of the application site itself will become unattractive to breeding or feeding curlews and lapwings due to disturbance/displacement.

The applicant cannot mitigate this effect on the application site (except by moving or removing WT1). It *is* possible to mitigate for this effect off-site (i.e. on the nature reserve) by improving the habitat in areas that should be beyond the reach of any disturbance/displacement effects from WT1.

The purpose of the electric anti-predator fence is to boost the number of breeding wader chicks that survive to fledging stage by offering them greater protection from ground predators like foxes. The RSPB employs such fences at several of our wet grassland reserves around the UK, and our own monitoring shows that they are an effective measure. The net result should be that

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<sup>1</sup> Pearce-Higgins, J.W., Stephen, L., Langston, R.H.W., Bainbridge, I.P. and Bullman, R. (2009). *The distribution of breeding birds around upland wind farms*. Journal of Applied Ecology, 46, 1323-1321.

And: Pearce-Higgins, J.W., Stephen, L., Douse, A. And Langston, R.H.W. (2012). *Greater impacts of wind farms on bird populations during construction than subsequent operation: results of a multi-site and multi-species analysis*. Journal of Applied Ecology, 49, 386-394.

even if marginally fewer pairs of waders breed on the nature reserve (or application site), they should be able to raise significantly more young that will go on to colonise this and other sites in the Trent Valley in future.

Creating additional ponds and swales should also have a beneficial effect, by increasing the areas available to wader chicks to find food (at the shallow muddy edges of such features).