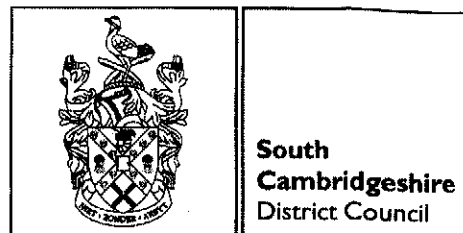


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Memo

To: Paul Sexton

From: Rob Mungovan

Date: 19th April 2010

Re: Heydon Grange Windfarm proposal

The following will need to be considered:

Impact on protected species such as badgers, common lizard, great crested newt and breeding birds should be evaluated by the applicant and presented in the ES so that it can be considered by the LPA prior to determining any forthcoming application.

All biodiversity impacts should be considered in terms of not just their immediate impact, but also the construction phase and the operation phase, particularly the cumulative effect resulting from turbines, trackways, cabling and on-site operational staff.

The phase 1 Habitat Survey should be fully presented with details of survey dates and staff. Target notes should be presented, ideally with site photographs of habitats.

The site contains the Heydon Pit County Wildlife Site and the Protected Roadside Verge. These important chalk grassland sites should not be impacted by the development. Translocation of grassland habitats, and the replanting of important hedgerows is not an option that will be looked upon favourably.

It is encouraging to read that the applicant has already undertaken a range of ecological surveys. Of particular sensitivity are birds and bats.

Birds

Windfarms may increase the risk of collision strike if inappropriately sited. At present it is my view that further studies should be undertaken with respect to; raptors (esp buzzard, red kite, and marsh harrier), barn owls, long eared owls, stone curlew and the range of wildfowl likely to make use of ~~Folmere~~ Folmere Watercress Beds SSSI.

The RSPB have responded to this scoping request. Please draw the applicant to the full extent of their response, especially the request for further studies as future survey work will be evaluated against the RSPB's request. The key points of the annex are repeated at the end of this response.

Bats

The applicant acknowledges that the issue of barotraumas with respect to bats. However, it does not appear to consider the risk of actual blade strike on bats or habitat loss. There is an

increasing amount of research on this subject and guidance on the matter is now being produced. The response by Natural England requests that survey for bats is inline with current best practise. It is very important that this is the case and the applicant will have to have regard to the requirements laid out in Eurobats *Wind Turbines and Bats Guidelines* and the Bat Conservation Trust's *Bat Survey Good Practice Guidelines*. The applicant must have regard to the full content of Natural England's letter in preparing the ES please ensure it is made available to them.

Whilst it may be assumed that no bat roosts occur within the site consideration will need to be given to bat flight paths, migration routes and feeding areas. The survey results should reflect a risk-based approach to likely harm to bats. Natural England have already categorised bats into low, medium and high risk with respect to turbine strike, it will be useful to be able to assess the level of bat usage at the site with respect to other sites and habitat types (ie could it be established that this relatively open arable landscape has less bat activity than a wooded river valley, or are both habitat types well used by bats that could be at harm from turbine strike?).

It is likely that surveys of the site's fauna will need to be undertaken over a range of survey seasons in order to gain a full understanding of the site's biodiversity, and to comply with appropriate guidelines.

The site is largely an arable landscape. It is possible that rare arable plants may exist within the site. What level of investigation has been undertaken into the site's flora?

The base of the base of the turbines and associated trackways and infrastructure has the potential to take land from biodiversity. When considering the impact it is useful to have a comparison of land types losses against land/habitat type provided. Mitigation measures should be clearly presented and compensatory habitats provided where mitigation alone is not appropriate.

Opportunities for habitat enhancement should be explored so as to provide a biodiversity gain inline with county Biodiversity Action Plan targets. This site provides an excellent opportunity to extend the chalk grassland habitats of the Heydon Chalk Pit CWS (how is the excavated chalk spoil to be disposed of?). New hedgerows and copses could be created at appropriate points in the landscape so as not to draw species towards the turbines blades.

See below for key points of RSPB response

Annex to RSPB comments on the Heydon Grange proposed Wind Farm Development

Potentially sensitive bird groups

1. Wildfowl

Wildfowl species are particularly susceptible to collision with wind turbines due to their large body mass and low manoeuvrability. Wildfowl generally roost and forage in different locations and are known to fly tens of kilometres to feed. Geese and swans tend to be most active at dusk and dawn when visibility is low and the chance of collision with stationary objects is higher. Where applicable, an EIA should fully assess the risk to these species, and be informed by vantage point surveys as appropriate.

2. Waders

Waders can also be affected by the construction and operation of wind turbines. It is thought the most significant effects occur as a result of indirect habitat loss, caused by a displacement of birds from feeding or roosting locations. Species listed in Annex 1 of the Birds Directive¹ include golden plovers, dunlins and bar-tailed godwits. These all appear in the UK in internationally important numbers during winter.

3. Raptors and crepuscular species

We note that five species of raptor have been recorded by initial surveys (although two species were represented by only one record to date). We also note that woodland habitat and hedgerows are present at the site, which will likely be attractive to raptors and/or crepuscular species.

Raptors are known to be susceptible to collision with wind turbines. Eastern England supports significant populations of marsh harriers; a species are on Annex 1 of the Birds Directive. Raptors are particularly at risk of collision when performing aerial display flights during the breeding season; newly fledged birds are more likely to come within turbine blade height due to their inexperience. We would expect surveys to be conducted at dusk and dawn to detect any crepuscular species, particularly owls, and other night-flying species, using the area.

Barn owl

Barn owls are protected under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). The RSPB recommends that detailed monitoring work be carried out to assess the likely impact of the proposed development upon breeding barn owl within the vicinity of the site. Barn owl surveys should be conducted outside the wind turbine site as well as within, to a distance of at least 1 km, and should include monitoring at dawn and dusk. A minimum of 48 hours of observation, year round, is recommended for barn owl surveying.

4. Lowland/farmland species

The RSPB consider it likely that the area around the proposal site supports a potentially significant population of farmland birds, as the area is identified by the Bird Conservation Targeting Projects² as

¹ EC Directive on the Conservation of Wild Birds 79/409 EEC (the 'Birds Directive').

² http://www.rspb.org.uk/Images/BCTP2009ArableAssemblageEastOfEngland_tcm9-199615.pdf

supporting a number of key range restricted arable species of farmland conservation concern, which are the focus for agri-environment funding.

Survey requirements for farmland birds

The SNH guidelines for this group suggests that a modified Common Bird Census (CBC) style survey is most appropriate for smaller areas and providing the best information for assessing wind turbines. The RSPB advises that the modified CBC survey should also include April, and should cover a **minimum** of three visits. Surveys should start early in the morning, preferably from dawn or shortly after, with at least one visit at dusk to assess the site use by nocturnal species. Surveys should take place at different times of day, including dawn and dusk, and should extend to 500m outside the proposed site, as set out in the SNH guidance.

Mitigating the effect of development on farmland birds

Recently, areas that support high numbers of farmland birds within the Eastern England region have been affected by a range of developments, especially wind farms. While the RSPB accepts that the main impact of such developments on farmland bird species is displacement (although corn bunting has been recorded as a fatality in a recent post-construction monitoring report), this may result in poorer quality sites being used. Overall this could reduce breeding densities and affect breeding productivity.