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Dear Mr Jones

Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 – Request for a Scoping Opinion – Heydon Grange Wind Farm Development, Heydon

Thank you for consulting Natural England in your letter dated 23rd March 2010. Please find our comments below based on the information provided.

Ecology

Designated Sites

The proposal site is within approximately 3km of Fowlmere Watercress Beds SSSI. This site has been designated on account of its range of habitats including open water, reed bed, fen and carr woodland which in turn support a diverse assemblage of wetland birds. Although some distance from the proposed development site the possible impacts to this SSSI should be considered within the EIA.

Site Habitats

The summary of the Phase 1 habitat survey within the scoping report is helpful in setting the context of habitats on site and identifies several habitat features of note. In addition to the January 2009 Phase 1 habitat survey further botanical survey work should also be included within the EIA and should be completed at an appropriate time of year. This should include in particular the hedgerows, calcareous grassland and quarry. Although arable farmland is often of low intrinsic ecological value the sites arable flora should also be included in botanical surveys as cultivated chalk soils in this area can support a range of rare arable plants. The results of habitat and botanical surveys should be used to inform mitigation as well as enhancement measures within the proposals.

Birds

The scoping report provides a summary of the results of bird surveys at the site and refers to view point and walkover surveys, however details such as the frequency and timing of surveys are not discussed. Natural England has recently produced guidance titled *Assessing the Effects of Onshore Wind Farms on Birds* which sets out our expectations for this type of assessment. General requirements identified within the guidance include the need to collect data across different seasons and under representative conditions (e.g. weather, time of day), the need for post-development monitoring and the use of appropriate survey methodologies. The guidance also highlights the importance of assessment methodologies responding to site specific considerations such as the bird species which are present locally and how they are likely to use the site (the Heydon Grange site will be used by a range of farmland birds and may fall within bird migration routes, e.g. for summer breeding birds at nearby Fowlmere). The document can be found at the following link: <http://naturalengland.etraderstores.com/NaturalEnglandShop/TIN069>

Other Protected and Notable Species

Natural England has produced guidance¹ to help identify the level of risk posed to bats from turbines. This takes into account the behaviour of particular bat species and site characteristics. We recommend that this should be used to help identify the risk posed to bats and the level of survey effort required. The survey methodology used to inform the EIA should follow current best practice with reference to material such as the Eurobats *Wind turbines and Bats Guidelines* and the Bat Conservation Trust's *Bat Survey Good Practice Guidelines*. In addition we would suggest that the proposed standard methodology for wind farm bat surveys published in the IEEM membership bulletin (*In Practice*, no 62, Dec 2008) and refinements proposed in a further article (*In Practice*, no 64, June 2009) form a useful frame of reference. We would expect the methodology used to reflect the level of risk to bats at the site and to allow ready comparison with the results of post-development monitoring.

The potential presence of further protected species including badgers and great crested newts is identified through the scoping report. The presence of all protected species which could be affected by the proposals should be determined prior to submission of any planning application through completion of surveys to best practice standards. One species group not discussed in the scoping report is reptiles. The habitat descriptions suggest areas suitable for reptiles may be present in parts of the site (e.g. grasslands and quarry) and surveys should be undertaken should reptiles be subject to risk of harm through the proposals.

The proposals should ensure that site layout positions the turbines away from sensitive areas for protected species. For example ditches, woodland and hedgerows can all be used for either foraging or as flight-lines by bats, and ensuring a sufficient distance¹ from the turbines to these areas, may reduce any impacts. Likewise, turbines and infrastructure works should aim to minimise impacts to terrestrial species by being sited away from other habitats of wildlife value, such as rough grassland and scrub. A strategy for future monitoring is likely to be required in following years to ensure that the turbines are not impacting bird and bat populations and that any species or habitat focused mitigation is successful.

It is recommended that you contact the Cambridgeshire Biological Records Centre c/o The Cambridgeshire Wildlife Trust, as they may be a potential source for further information on protected species in the area. The RSPB, the county bird recorder and Cambridgeshire Bat Group should also be consulted for information regarding bird and bat records and potential impacts in the area.

Ecological Enhancement

Natural England considers that the potential for any development to provide nature conservation enhancements should be clearly distinguished from measures to mitigate or compensate for harm to nature conservation interests. Guidance is given in *Planning Policy Statement 9 (PPS9) Biodiversity & Geological Conservation*, recommending that all efforts are made to retain existing habitat of nature conservation value, and that specific enhancement works are made for the benefit of wildlife. Where appropriate these can take place at an off-site location. Proposals for enhancements should take into account the local as well as national Biodiversity Action Plan priority species and habitats.

Landscape

Wind turbine developments can have a potentially detrimental impact on the characteristics of the landscape and on visual amenity. In this case Natural England is particularly concerned by potential impacts to the enjoyment of users of the Harcamlow Way and Icknield Way long distance footpaths. With regard to methodology landscape assessment should be carried out using current industry standards including the 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA). It is essential that the cumulative impacts of this scheme and all other existing and proposed turbines are fully considered as part of any such assessment. The additional impact of the required overhead power lines should also be considered as far as possible within the assessment. As well as providing

¹ See Natural England Technical Information Note TIN051 *Bats and onshore wind turbines* (Interim guidance) available at: <http://naturalengland.etraderstores.com/NaturalEnglandShop/TIN051>

mitigation proposals the assessment should also identify opportunities for enhancements in keeping with the local landscape character including positive management of valued landscape features.

Recreation and Access

As mentioned above the proposals have the potential to adversely affect the visual amenity of the locality from long distance footpaths and could also have similar effects to other public rights of way. Opportunities should be sought to mitigate such impacts and to enhance public access wherever possible. Such opportunities could include improving the quality of existing rights of way or creating new access routes within the site.

I trust these comments are of use in preparing your scoping opinion. We would welcome the opportunity to discuss these proposals with you and the applicants further once more details are available.

Yours sincerely



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