



Andrew Ashcroft
Isle of Wight Council
Council Offices
Seaclose
Fairlee Road
Newport
Isle of Wight
PO30 2QS

21 July 2006

Dear Mr Ashcroft

APPLICATION FOR 6 WIND TURBINES ON LAND SOUTH OF WELLOW: P/01400/06 – TCP/27774

Thank you for the opportunity to comment on the above application. Our comments are restricted to the potential impacts on birds. Although we recognise that there are other significant concerns regarding landscape impacts, it is not within our remit to comment on these matters.

The RSPB's policy on renewable energy

The RSPB supports the Government's efforts to develop renewable energy resources. We believe that renewables offer an opportunity to modify or reverse the deleterious environmental changes associated with climate change, arising from over-reliance on fossil fuels. However, as with any development, renewable energy developments should not have an adverse effect on designated or qualifying international and national sites (eg. Special Protection Areas and Special Areas for Conservation) or other areas with large concentrations of birds such as migratory flight paths. Therefore, we believe that the precautionary approach should apply in these situations, where a risk is identified.

Response to the application

We have reviewed the information contained within the Environmental Statement (ES) and accompanying technical appendices, and have strong concerns that a number of significant gaps exist in the ornithological data and analysis. Without this information, a full assessment of the potential impacts on birds - particularly wintering and migratory birds - cannot be made. We are also concerned that the current mitigation proposals are inadequate. For these reasons, we wish to register an **OBJECTION** to the above application. Our concerns are explained in greater detail below.

Impacts on SPA species

The application site lies within 2km of the Solent and Southampton Water Special Protection Area (SPA). The SPA is designated, amongst other reasons, for its large assemblages of wintering birds, which feed and roost within intertidal areas and adjoining habitats. SPAs are designated under the European Birds Directive, and receive the highest level of protection under UK and European law. Any plans or projects which, either alone or in combination with other plans or projects, present a likely significant effect (direct or indirect) to an SPA,

must be subjected to an appropriate assessment under the Habitats Regulations. Where impacts cannot be mitigated, a damaging application can only proceed if it can be determined that there are no alternatives and overriding reasons of public interest. In such cases (which are few), suitable compensation must be carried out before the activity can proceed.

While the application presents no direct impacts to the SPA, the environmental assessment has identified the use of the application site by significant numbers of golden plovers (an assemblage feature of the SPA), which are most likely the same birds recorded within the SPA. Therefore the application site (along with a number of other surrounding fields) can be considered a functional link to the SPA, and hence damage to these populations could lead to an adverse effect on the overall SPA population. For this reason, we strongly recommend that an appropriate assessment of the potential effects of the proposal on the SPA be carried out by the Council.

Diurnal records of the numbers and movements of golden plovers have been collected over two winter periods. This is the absolute minimum amount of data that the RSPB considers necessary to carry out an adequate impact assessment for a windfarm application of this size. It is disappointing that a control site was not also monitored, as we previously recommended to the developer's consultants. This would have allowed comparison assessments to be carried out, particularly to inform any post construction monitoring. Nevertheless, we consider the diurnal golden plover data collected to be sufficient with which to carry out a collision risk assessment.

Nocturnal records were also collected, following our advice to Terence O'Rourke (email to Jeff Picksley of 20th January 2006). Unfortunately, however, we do not consider the nocturnal observations carried out (which did not record any golden plover presence) to be adequate in number, duration or range of conditions. Recent research (Gillings et al, 2005¹) has found distinct differences in patterns of field use by golden plovers during day and night, and significant movements have been observed during the night, not just at twilight. Therefore understanding the nocturnal movements of these birds within the area of the proposed turbines is essential to understanding the overall potential impacts on this species. Nocturnal surveys need to assess use of fields across the winter season and across the entire night-time period, in particular comparing different moon phases (full moon, new moon etc) in relation to cloud cover - ie visibility. Stratifying the observation periods would therefore be an appropriate sampling method. Field methods, using a combination of listening and visual observations using binoculars and telescope with an infrared spotlight would be suitable to this type of survey. Clearly the more visits carried out, the greater confidence can be placed in the findings.

The collision risk assessment, based only on diurnal data, suggests between 150 and 450 golden plover (depending on the inclusion of an apparently anomalous record) fatalities over the 25 year lifetime of the turbines. This represents between 2.67 and 1.17% of the total golden plover SPA population. In order to assess the impact of this on the SPA as a whole, the ES considers the fatalities in light of their proportion of the overall assemblage figure (53,948 waterfowl) for the SPA. We do not consider this an acceptable method of assessment. Following this line of argument, the loss of the entire golden plover population from the SPA would be considered insignificant. This is clearly not acceptable for any SPA species, assemblage or otherwise, particularly in the case of golden plover, which is also listed under Annex 1 of the EU Birds Directive. Annex 1 species are notified for their particular rarity or vulnerability, and should be given the highest level of protection wherever they occur. This should also be reflected in the level of importance assigned to golden plover in the residual effects impact assessment (Table 6.13), where it is currently only assigned 'medium importance'. If it were assigned 'high importance', (as it clearly should, by way of being a European protected species) this would alter the significance of residual effects from 'moderate' to either 'substantial' or 'very substantial'. We ask the Council to take note of these points should they carry out an appropriate assessment of the proposals on the integrity of the SPA.

¹ S Gillings, R J Fuller, W J Sutherland (2005). Diurnal Studies Do Not Predict Nocturnal Habitat Choice And Site Selection Of European Golden-Plovers (*Pluvialis Apricaria* And Northern Lapwings (*Vanellus Vanellus*). The Auk. Vol 122, Issue 4.

Due to the importance of golden plovers and the significant collision risk without mitigation, we consider that robust mitigation measures are essential. Paragraphs 6.129 and 6.133 of the ES makes brief reference to possible mitigation options for golden plovers, notably the possibility of a general increasing preference for planting of oil seed rape. We agree that an oil seed rape crop (or other crop which would provide sufficient ground cover during the winter) in the fields holding the turbines would prove suitably unattractive to deter golden plovers from the immediate vicinity of the windfarm. In combination with this, we would strongly advise that alternative fields away from the windfarm site are enhanced for golden plovers, to ensure no net loss of the overall feeding resource and to further minimise impacts on golden plovers. We would require this to be secured in a section 106 (or other suitable legal agreement) to have sufficient confidence that ongoing mitigation will be provided for this species of European importance. We would be happy to advise on the details of any such legal agreement, including the details of the necessary changes to local cropping regimes.

Impacts on migrant birds

Local ornithologists have confirmed that migratory birds, including ospreys, honey buzzards and nightjars (all Annex 1 species), pass over the Isle of Wight in a broad front during the Spring and Autumn migration periods. Although there are no features within the application site that are likely to funnel migratory birds and draw them directly into the path of the turbines, there is a risk that passage birds could nevertheless pass through the site, and therefore the collision risk of these species must be assessed. Unfortunately, no passage surveys were carried out, and therefore it is not possible to reach a conclusion on the potential impacts on passage species. We advise that further surveys be carried out to provide the necessary data to assess the risk to migratory birds.

Radar could be used to assess the volume and timing of migratory birds, although this would require supplementary visual (and auditory) observation for species identification. We would suggest an initial collation of existing information on migratory passage for the Isle of Wight - timing (season and time of day/night), species etc - which can be used to focus observations on likely peak periods. Migration flight height will depend on weather conditions and windspeed, so that too will influence risk for migrants, and will need to be taken account of in the surveys and analysis.

We consider this data essential to ability of the ES to fully assess the likely impacts on birds arising from the windfarm.

Impacts on local bird populations

The ES has identified potential impacts on a number of locally important bird populations, notably skylarks, buzzards and barn owls. We accept that the impacts on these species is likely to be low, in a county-level context, however we strongly recommend that further mitigation is carried out to ensure minimal impact on these species.

Barn owls and common buzzards were both recorded hunting within the study area, and are both likely to be breeding in close proximity to the windfarm site. The collision risk for these species could be high, particularly, as the ES points out, following post-fledging dispersal. To minimise the risk to these species we would recommend that the proposals to locate conservation headlands, set-aside, and other habitat features likely to attract large numbers of potential prey species, well away from the turbines (paragraph 6.130) are made a condition of any consent for the windfarm application. These measures would also provide some mitigation for other raptors recorded on site, such as merlins, peregrines, and hen harriers, which are also attracted to these field features. Again, we would anticipate that these features be re-created elsewhere, away from the windfarm site, to mitigate the loss of a potentially important feeding resource to these locally important species. This could be carried out in conjunction with mitigation measures for golden plovers.

The bird surveys also indicated a high number of skylark territories within the application site, which may be displaced by the windfarm. Although the Island as a whole supports a healthy population of skylarks, it should be noted that, in a national context, skylarks are a red listed species (RSPB Birds of Conservation Concern: 2002-2007), due to rapid declines ($\geq 50\%$) in their UK breeding populations over the last 25 years. Furthermore, the planting of oil seed rape or similar crop to deter golden plovers is also likely to deter skylarks,

which will not feed or nest in a crop with such high ground cover. Therefore, we strongly recommend that further measures are conditioned to mitigate for the loss of this habitat to skylarks. This could also be linked with mitigation for golden plovers, barn owls and buzzards. The RSPB would be happy to advise on the detailed design of such mitigation.

Impacts during construction


Paragraph 6.95 of the ES suggests that the most sensitive species to construction-related disturbance will be breeding birds in the area, notably skylarks. While we agree that breeding skylarks could be susceptible to noise disturbance, so might golden plovers, which, given their international importance, should take higher priority. We recommend that mitigation measures described above, notably the planting of oil seed rape or similar high cover crop is carried out prior to any construction works, to ensure that the site is unfavourable to both golden plovers and skylarks. Alternative suitable habitat should also be in place prior to construction to mitigate this loss.

Long-term post-construction monitoring

If consented, long term monitoring, once the windfarm is in operation, is clearly critically important to understand the full impacts of wind turbines on bird populations. Unfortunately, this has been a major defect of previous windfarm developments in the UK and abroad. We therefore support the proposals in paragraph 6.131 of the ES, which propose an ornithological monitoring programme to monitor residual effects on birds, in order to inform any further mitigation where necessary. We would be happy to assist in the development of any such monitoring associated with the operational phase of the windfarm.

I hope that these comments are helpful. Please do get in touch should you wish to discuss any of the points raised in further detail.

Yours sincerely

A handwritten signature in black ink that reads "Carrie Temple". The signature is written in a cursive, slightly slanted style.

Carrie Temple
Conservation Officer