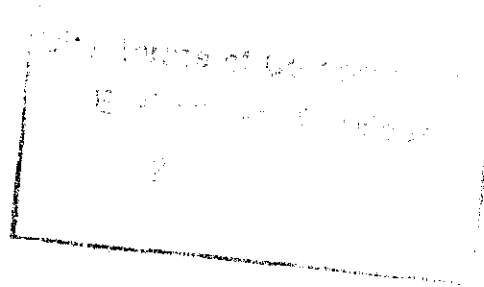




Andrew Pegram
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28 September 2006

Dear Mr Pegram

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

Thank you for consulting the RSPB on the additional information to the West Wight windfarm application. As per our previous correspondence regarding this application, our comments are restricted to the potential impacts on birds, in particular those of national and international significance.

The additional information in the Environmental Statement (ES) Addendum attempts to address some of the concerns previously raised by the RSPB and others. The Addendum does not present any new ornithological data relating to the application site, but instead reassesses the previous vantage point data for golden plover, and provides a desktop study of the potential risk to migratory birds. We would like to make the following comments on this additional information.

Impacts on golden plover

We stated in our letter of 31 July 2006 that the absence of adequate nocturnal surveys was a failing of the original ES, and could affect the conclusion of the ES for this species. In our letter, we offered clear guidelines on the requirements of such surveys; nevertheless, this has not been addressed in the Addendum.

Golden plover are an assemblage feature of the Solent and Southampton Water SPA. The numbers of birds using the application site and surrounding area indicate that this area represents a functional link to the SPA. Hence, damage to these populations could lead to an adverse effect on the overall SPA. The absence of adequate records of nocturnal use of the area by golden plover is of significant concern, and for this reason **we are not able to remove our outstanding OBJECTION to this application.**

The recalculations for the diurnal collision-risk of golden plover indicate a considerable reduction in the collision risk to this species, from 150-450 individuals over the lifetime of the wind farm, to just 14-19 mortalities over this same period. It is unclear from the addendum exactly how this recalculation was carried

out, and we request further information on the revised method of data preparation that led to this widely differing conclusion of collision risk.

As previously mentioned in our comments of 31 July, in order to assess the impact of the wind farm on the SPA as a whole, the collision risk to golden plover must be assessed as a proportion of the species' population within the SPA, not the total assemblage population. Although the collision risk is considerably lowered, this error appears to have been repeated in the Addendum.

A standard avoidance rate of 95% has been used in the collision risk calculations. As there is currently little evidence to support such avoidance rates, as a precaution, we would suggest that a suitable method of assessing the level of risk to the SPA golden plover population would be to determine at what percentage avoidance rate the risk would become significant – ie. 1% or greater of the golden plover SPA population affected. This would help to provide a more objective assessment of the collision risk.

Mitigation for golden plover

Even if the lower collision risk to golden plover presented in the Addendum is accepted, we are extremely disappointed that any measures to mitigate for this potential loss is now removed from the application. As a minimum, it should be assumed that feeding golden plover will not habituate to the wind turbines and will in future avoid the application site and potentially a surrounding buffer. It is unknown whether the current feeding resource is utilised at capacity or whether this loss could be compensated by alternative feeding areas in the vicinity. Therefore, we would strongly suggest that the precautionary principle should be applied and measures taken to replace this resource elsewhere, if necessary through a management agreement with an adjoining landowner to enhance a comparable area for golden plover through the cropping regime.

We remind the Council of their duty as a Section 28G Authority, under the Countryside and Rights of Way Act (2000), to ensure (in exercising its normal functions) the conservation and enhancement of SSSIs, where possible and appropriate.

To further reduce the risk of golden plover coming into contact with the turbines, we would also recommend that the cropping of the application site is adapted (and secure via a planning condition) to deter golden plovers from the immediate vicinity of the wind farm, for example by the planting of oil seed rape or another high-cover crop.

Impacts on migrant birds

We welcome the developer's attempts to investigate the potential risks to migratory species passing through the application site. Unfortunately, however, the desktop study does not offer a great deal of further information on the matter that is relevant to the application area. Nevertheless, we appreciate the difficulty in collecting such data, and accept that migratory birds are likely to pass over the Island on a broad front and for that reason are likely to be at limited risk of collision with the wind farm.

We recommend that, in the absence of any migratory bird data for the application site, if the Council is minded to grant this application, a robust, long-term post-construction monitoring package must be a condition of the consent, with the ability to ensure further mitigation or adaptation of the wind farm, should a significant risk be later identified. We note that the principle of a monitoring scheme is now identified as a firm mitigation measure in Section 19 of the Addendum. We request that in addition to English Nature and the Council, that the RSPB is also party to the design and review of such a scheme.

Impacts on local bird populations

We note that no further assessment has been carried out of the risk to locally important bird populations, including the presence of Schedule 1 species, such as barn owl. However, we note that proposals to ensure that field features which may attract species such as merlin, hen harrier and barn owl, are located away from the turbines. We recommend that, if minded to consent the development, the Council follows the developer's suggestion and includes these and other mitigation measures as a condition on the consent.

Appropriate Assessment

We understand that the Council is carrying out an appropriate assessment of the application under the Habitats Regulations, which we warmly welcome. It is our belief that, from the information presented within the ES and ES Addendum, it is not possible to conclude no adverse effect on the Solent and Southampton Water SPA, in particular due to the lack of adequate nocturnal data for golden plover. We hope that the Council will take a precautionary approach to its assessment and ensure that no damage occurs to the SPA.

We hope that our comments are helpful. We would be happy to discuss any of our comments in more detail, should you wish.

Yours sincerely

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Carrie Temple
Conservation Officer