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From: Miriam Baines, Ecologist

Ref: 23/01779/SCOPE

To: Development Management

Date: 15/06/2023

Extension: 07740 368782

Copy to: David Feige, Environment & Design Team  
Manager and County Ecologist

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## **Description of development Address**

Thank you for consulting me on this Scoping Opinion application

### Summary

This scoping Opinion deals only with a single large turbine. It is clear from the information provided that a large solar array proposal is also being considered although I cannot see another scoping opinion request regarding this.

It is important to bear in mind that the single turbine is unlikely to be a standalone application as it will very probably require additional infrastructure such as access tracks and cable connections and this is likely to be shared with any solar array planning application to some extent. There will be a level of cumulative impacts with the two planning applications together as well as some complimentary features which will lessen the impacts of the individual proposals. For this reason, I will consider both of the proposals at this stage and both the ornithological and terrestrial ecology chapters of the EIA.

### **Desk Study**

The local records centre Environmental Records Information Centre for the North East of England (ERIC) data has been omitted from the list of data sources. This needs to be added in to ensure adequate species and Local Wildlife Site information is obtained. I recommend an area of 2km from the edge of the site is included to ensure adequate records are identified.

The desk study for ornithology needs to be considered carefully in order to rule out the presence of wintering birds and raptors. As well as data from ERIC, other sources such as data from local bird group and BTO reports may need to be included.

### **Protected sites**

The nearest protected site to the development is the Tweed Catchment Rivers England: lower Tweed and Whiteadder Site of Special Scientific Interest (SSSI) which is part of the wider River Tweed Special area of conservation (SAC). The only impact pathway between this protected site and any of the development is the potential of pollution/silt/runoff etc on the R. Tweed or the tributaries which may be caused by the Development.

We do consider however that solar farms and potentially windfarms can have a positive effect

on these sites due to the cessation of arable farming operations such as ploughing, fertiliser and chemical inputs.

I disagree with the statements about Protected sites for birds within 20km. Please ensure you assess any impacts to Special Protection Areas (SPA) within this distance, especially those such as Lindisfarne SPA and Holburn Moss SPA which have wintering geese among their interest features as these species can commute long distances to feed. In addition, there is a Scottish SPA called Greenlaw Moor about 18 km from the site about which I have no details. These sites need to be screened out with respect to impacts to qualifying features by looking at potential migration pathways and habitat connectivity. Further survey and a Habitats Regulation Assessment may need to be undertaken if impacts cannot be screened out.

Advice from Natural England and potentially NatureScot may be required with respect to this assessment.

## **Habitat**

The land is predominantly arable land and within the site itself, there is really only field margins and hedges to consider in a baseline habitat survey. There are highly unlikely to be any NVC communities to assess on the site itself. We will most likely require a baseline Biodiversity net gain assessment using UK Hab Classifications and proposals for offsetting any losses.

Currently we have an interim position statement on Biodiversity Net Gain. (see below). Secondary legislation for mandatory net gain with further clarification of policy on net gain is expected this autumn. Any planning application which is live after 1<sup>st</sup> November is likely to have to conform in full to this legislation.

An assessment of the value of hedges on the site will be required and impacts to their value and connectivity should be minimised as far as possible when designing the development including the access facilities.

The main emphasis for phase 2 surveys will be within the broadleaved woodlands adjacent to the site should impacts be predicted. We will be looking for an adequate buffer (15m or more) between these woodlands and any part of the development which is likely to preclude the need for detailed habitat surveys and minimise the need for protected species surveys.

## **Bats**

Providing an adequate buffer is maintained between the development and the woodland to the south, the impact to bats is likely to be limited. There is little scope for bats to roost on the site. (1 tree where the access track is proposed). Bats are likely to be predominantly associated with the woodlands and field margins on or close to the site. A habitat assessment and assessment of potential commuting routes may be required, however for turbines a 50m buffer between the turbine and any habitats such as hedges is usually acceptable. This may require adjusting for a larger turbine that is proposed here. (see: Natural England Technical Information Note TIN059). Although the full range of surveys are proposed, in reality, an initial assessment is likely to rule out the need for many of the phase 2 surveys. We would prefer that the turbine is located at an adequate distance from the nearest hedge to avoid impacts.

## **Other non-avian protected species**

Generic survey guidelines are included for species which may be present in the vicinity, which is appropriate. But there is little, if any, riparian habitat on the site and we would expect a buffer from the woodland/riparian habitats which will reduce the potential impact to most species. The

area quoted for field survey for individual species appears to be appropriate.

## **Birds**

Again, the bird surveys proposed are generic and will be refined in the baseline Ecological Impact Assessment. Because of the woodland, adjacent and further afield, raptor studies are important to rule out potential impacts of the development. It is not clear from the documents which raptor survey technique will be used but this will need agreeing once the decision has been made.

We do not have much information for the area regarding wintering birds, and in particular the use of the site/area by Annex 1 species associated with nearby protected sites.

To be able to rule out impacts from the Turbine, a robust data search will be required, leading in turn to a robust justification of why conclusions have been made.

The bird survey guidelines recommend that six bird survey visits will be undertaken as part of a survey for breeding birds (rather than the three that have been proposed)

<https://birdsurveyguidelines.org/methods/survey-method/>

## **Conclusions**

### **ECOLOGY**

#### **Q10/1: Do consultees agree that the range of ecological surveys proposed is sufficient and proportionate to inform the design and assessment of the Proposed Development?**

Yes but this may need to be refined further once the design of the development has been finalised. The main requirements are that a sufficient buffer is maintained between the woodland and the development, the turbine is at least 50m for the nearest hedge and connectivity within the site is maintained during the development and ongoing use of the development.

Biodiversity net gain will need to be demonstrated.

A full local records centre data search with a 2km buffer is required.

#### **Q10/2: Do consultees agree that the full range of likely effects to be assessed within the ES has been adequately identified and is proportionate to the nature of the Proposed Development?**

At this stage, yes, but this will need to be considered further when the final design has been provided. As with the proposed surveys question, the main requirements are that a sufficient buffer is maintained between the woodland and the development, the turbine is at least 50m for the nearest hedge and connectivity within the site is maintained during the development and ongoing use of the development. This will limit the potential impacts to ecology.

#### **Q10/3: Are there any other relevant consultees who should be contacted with respect to the ecology assessment and scope of baseline information gathering?**

Yes – the Environmental Records Centre for NE England

## Ornithology

**Q11/1: Do consultees agree that the range of ornithological surveys proposed is sufficient and proportionate to inform the design and assessment of the Proposed Development?**

No:

We need six breeding bird visits using the Bird Survey Guidelines methodology.

We need confirmation of raptor survey methodology.

Requirements should be reviewed after the desk study to clarify if winter vantage point surveys are required, for example if large numbers of wintering geese use the area.

**• Q11/2: Do consultees agree that the full range of likely effects to be assessed within the EIA has been adequately identified and is proportionate to the nature of the Proposed Development?**

At this stage, yes but the desk study and the final design of the development will determine this fully.

**• Q11/3: Are there any other relevant consultees who should be contacted with respect to the ornithology assessment and scope of baseline information gathering?**

BTO data and consultations with local bird groups (not just raptor groups) will more robustly support the conclusions made about wintering birds.

Data needs to be obtained from the Environmental Records Centre for NE England

It is possible consultation with NatureScot will be required with regard to the SPA in their protection.

**Miriam Baines**

Ecologist

Environment & Design, Northumberland County Council.

## Appendix1: Supporting Information

The National Planning Policy Framework (NPPF) makes it clear that aside from purely mitigating against the harm that a development may cause to biodiversity the definition of sustainable development includes biodiversity enhancement. Paragraph 174d states *"[Planning] decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity..."* and paragraph 180d states *"...opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity."*

The National Planning Policy Guidelines (NPPG issued 21/07/2019) under Natural Environment, paragraph 23 headed 'How can biodiversity net gain be achieved?' affirm: *"Relatively small features can often achieve important benefits for wildlife, such as incorporating swift bricks and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat."*

Ready-made integrated bird and bat boxes built into new buildings provide long lasting roosting/nesting features. Most boxes consist of a self-contained concrete roost chamber; however, options are available which will allow bats access into the roof space or wall cavity of the building. Examples of boxes can be readily seen online (e.g., <https://www.nhbs.com/equipment>). Swift brick/boxes are a good option, being able to accommodate a range of smaller cavity nesting birds (house sparrows, blue tits, great tits). Bat boxes are best located on south or east elevations and bird boxes on north and east elevations of buildings.

Using native species in landscaping schemes has many advantages. They are the most likely to support the most wildlife and avoid the risk of the problems that invasive species bring. Many of them are just as attractive as ornamental varieties and will bring a sense of local distinctiveness to planting schemes.

A list of plant species native to Northumberland can be found online <https://www.northumberlandcoastaonb.org/files/Downloads/Botanical%20species%20native%20to%20Northumberland%20-%20Google%20Docs.pdf>

A list of suitable trees is available online from Northumberland Wildlife Trust <https://www.nwt.org.uk/what-we-donews-and-publications/publications> Please note Field Maple is not considered locally native to Northumberland and should not be widely planted, and it is no longer recommended to include Ash in planting schemes due to the prevalence of ash die back disease (Chalara).

### 10% Biodiversity Net Gain using the Defra Metric

The Environment Act 2021 introduces mandatory biodiversity net gain requirements for most planning applications, to be established through secondary legislation and statutory guidance, and implemented by the end of 2023.

Northumberland County Council Planning Service have produced a position statement for this two-year transition period; in summary, net gain as required through the NPPF and Local Plan Policy ENV2 will generally remain the position for the time-being, although the Planning Service will seek to agree a more formal metric-based approach for certain larger or more sensitive developments. The full statement can be read here: <https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and-Building/BNGPositionStatementJanuary2022.pdf>