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By Email Only (planning@nature@staffs-wildlife.org.uk)

Kate Dewey
Staffordshire Wildlife Trust
The Wolsley Centre
Wolsley Bridge
Stafford, ST17 0WT.

Our ref: 10669

Dear Kate:

Totmonslow Solar, Draycott in the Moors, Staffordshire, ST10 4JJ

Following comments from Arne Swithenbank (Staffordshire Moorlands District Council) and Kate Dewey (Staffordshire Wildlife Trust) it was determined that further information is required for this site: *"Given the lack of breeding bird surveys, we'd require a desk study setting out the likely 'worst case scenario' in terms of potential for lapwing, skylark and yellow wagtail to be present on the application site, how many pairs may be displaced, and how this could be mitigated on and off-site. If a suitable mitigation area can be confirmed, then breeding bird surveys and an appropriate detailed mitigation plan could be conditioned."*

During both the initial Preliminary Ecological Appraisal (PEA) visit in November 2021, and the National Vegetation Classification (NVC) visit in May 2022, ground nesting birds such as skylark, lapwing, and yellow wagtail were **not** observed. Whilst these visits do not constitute a breeding or wintering bird survey, it would be expected that if species were present in either capacity there would be some evidence of activity.

The existing field layout creates a number of relatively small enclosures surrounded by hedgerows. This bocage type landscape is generally not favoured by ground nesting birds as the trees and hedges provide vantage points and cover for predators. Within the proposed development, only one field, in the south east of the site, has a minimum width of 200m. The rest are all under 130m at their narrowest point.

The data search showed there were both breeding lapwings (*Vanellus vanellus*) and skylarks (*Alauda arvensis*) within 2km of the proposed development. However, both species were restricted to the area south of Blythe Business Park. Aerial images show this area to comprise fields that are over 300m at their narrowest points.

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This supports the findings of Bernholdt et al (2017) who found that 88% of lapwing nests are over 500m from trees. Fox (2022) reports that skylarks are deterred from nesting within 200m of any tall structure or tree.

No yellow wagtail (*Motacilla flava*) were reported from the data search.

A study seen relating to the area of land south of the A50 showed the presence of breeding skylark, lapwing and yellow wagtail (Tyler Grange, 2022). These were all restricted to 2 fields within one area. Although the fields appeared to be around 130m in width, they were not divided from the adjoining field by a significant hedgerow or boundary features so in effect they were in a field that appeared to be 265m across at its narrowest point. This is much larger than the majority of the fields within the proposed development, where large hedges form the barriers between fields. This survey also covered some of the proposed development area to the north of the A50, where non of these ground nesting species were reported as breeding. However, individual lapwing and grasshopper warbler were recorded in the north west of the proposed development area. Lapwing will presumably forage closer than they will nest, to tall hedgerow features.

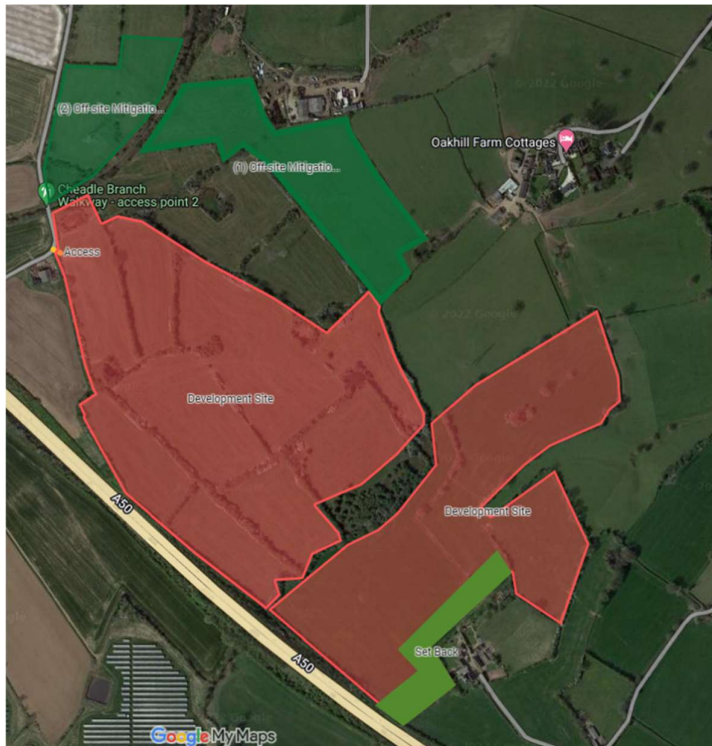
Grasshopper warbler (*Locustella naevia*) are summer visitors and prefer dense vegetation. They nest in scrub and reedbeds.

The current habitats are, suitable for foraging for skylarks which has been shown to occur closer to structures. In addition, the current area offers suitable foraging habitat for species such as overwintering redwing (*Turdus iliacus*), fieldfare (*Turdus pilaris*), and resident linnet (*Linaria cannabina*) and yellowhammer (*Emberiza citrinella*). The latter of the two may even breed within the hedgerow. These species were all reported from the data search so would be likely to use the site currently.

The proposed development would retain the habitat for these species. Additionally, skylarks have been observed to forage amongst solar PV units (Fox, 2022).

The proposed biodiversity enhancements across the site would benefit a range of bird species for foraging and, in the case of arboreal nesters, breeding.

The map below shows the area where additional compensatory habitat could be incorporated if necessary following post determination surveys. Area 1 (the green area in the north east marked 'Offsite Mitigation') seems to have the most potential.



Area 1 has a total size of 5.3ha so would provide a significant increase in offsite mitigation. A footpath passes through this area at its narrowest point but it is not considered that this would have a significant impact on birds foraging there. Presently there are footpaths through the site and during the surveys no pedestrians were seen to be using these routes. The majority of area 1 would remain undisturbed.

In conclusion, it is not considered that ground nesting birds are currently using the site due to the relatively narrow field size. It is presumed that a number of species will use it for foraging, both on the ground and in the hedgerows and trees. There are likely to be a number of species using the hedgerows and trees for breeding. The proposed development would enhance the site for biodiversity, with an additional 5.3ha being used solely for biodiversity enhancements. These enhancements will benefit a range of species including a number of red list birds.



A robust management plan detailing the timing and intensity of grassland and hedgerow maintenance should be a pre-commencement condition. This will ensure the site provides benefit for a range of species. In addition, the proposed development will provide other more general benefits such moving away from reliance of fossil fuels.

Yours sincerely

A handwritten signature in black ink, appearing to be "Paul Carter".

Paul Carter
Principal Environmental Consultant

Sources

Bertholdt, N., Gill, J., Laidlaw, R., and Smart, J. (2017) Landscape effects on nest site selection and nest success of Northern Lapwing *Vanellus vanellus* in lowland wet grasslands, *Bird Study*, 64:1, 30-36

Fox, H., (2022) Blithe Spirit: Are skylarks being overlooked in impact assessment? In *Practice* September 2022 Issue 117

Tyler Grange (2022) Blythe Solar Farm -Ground nesting bird mitigation report