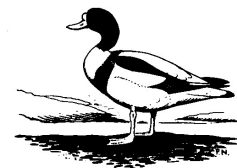

PROPOSED ERECTION OF FOUR WIND TURBINES AT PORT CLARENCE BY AUGEAN plc

A FORMAL RESPONSE BY TEESMOUTH BIRD CLUB TO A SCOPING REPORT



THE TEES ESTUARY AND ADJACENT HABITATS

px Limited



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October 2009

TBC/RPT028/ECP

1.0 INTRODUCTION

Introduction

- 1.1 The Teesmouth Bird Club (TBC) was founded in 1960 and is one of the longest-standing nature conservation bodies in Cleveland. We have a particularly good knowledge of the birds of the Tees Estuary and produce the annual *'Cleveland Bird Report'*. We are responsible for reviewing all bird records within the Cleveland area (defined by the boundary of the former County of Cleveland, now the 4 unitary authorities of Hartlepool, Stockton-on-Tees, Middlesbrough and Redcar and Cleveland). Our membership stands at over 450. In November 2008, the Club published the *'The Breeding Birds of Cleveland'*, which describes and maps the distribution and abundance of all Cleveland's 127 breeding bird species during the period 1999-2006, the first time this has ever been done in our area.
- 1.2 Because of its long-standing nature, TBC has a vast historical knowledge of the birds of the Tees Estuary in particular and the Cleveland sub region as a whole, and holds records dating back over 60 years. These include those for the site known by the Club as *'Hargreave's Quarry'*; ie the area between Hunstman Drive in the north and the River Tees to the south. It includes the Augean waste disposal site.
- 1.3 TBC is a 'green' organisation and we support renewable energy as a means of reducing global warming but not at any cost. Where we consider that adverse environmental impacts outweigh the need for 'clean' energy production on a particular site then we will lodge an objection to a development: in our view, there is no case for destroying important biodiversity in one location in an attempt to arrest global warming elsewhere.

Teesmouth Bird Club's Appraisal Process

- 1.4 TBC's Conservation Sub-Committee appraised the Scoping Report produced by Enviro Consulting Limited and the comments outlined in this document represent the official views of the Club. Our appraisal involved:
- (i) Have all the likely environmental impacts (positive and negative) been identified for further study?
 - (ii) Are any additional studies/surveys required over and above those outlined in the Scoping Report?
 - (iii) Are there any significant ornithological issues arising out of the study that HBC and their consultants should be aware of?
- 1.5 Our response is confined solely to ornithological issues and we assume that comments on matters relating to visual intrusion, noise, traffic, archaeology and hydrology will be made by others with specialist interests in these fields.

2.0 TBC'S RESPONSE

Scoping Issues

- 2.1 We consider that the Scoping Report has identified all of the key environmental issues and, from an ornithological viewpoint, we regard the key aspects of the EIA as being:
- **The actual justification for a wind farm in this location:** When compared with any potential adverse environmental impacts.

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- **Flight lines of birds using the SPA, RSPB Saltholme, Dormans Pool SSSI, the River Tees and migrant birds passing through Teesmouth,** such as Common Buzzard, Sparrowhawk and Marsh Harrier, which frequently fly southeast over the area. Common Terns regularly traffic across the adjacent areas from the large colonies at RSPB Saltholme when feeding their young. Birds flying into and out of the SPA, particularly the North Tees Marshes and Seal Sands will also need to be identified and surveyed in different weather conditions and at different times of the year and day.
 - **Assessment of the likely collision risks to over-flying birds:** We appreciate the difficulties of undertaking this sort of assessment. Collision risk assessments in other wind farm developments we have appraised have been subjective and fundamentally flawed. Each wind farm location has its own unique set of environmental characteristics and it is, we believe, erroneous to apply the findings of one site to the EIA for another, as there are so many variables that affect the outcome. Collision risk is undoubtedly the TBC's main concern over this development. It is evident from TBC's records for this area that birds regularly collide with the numerous overhead power lines and the species affected have included Mute Swan, Common Tern, Shelduck and Great Black-backed, Herring, Common and Black-headed Gulls. The latter group will be particularly susceptible in view of the large numbers attracted to the working tip. We would strongly recommend that this survey work be carried out by an experienced third party, independent of the Enviro Consulting Project Team.
 - **Loss of habitat:** Hargreave's Quarry has a mosaic of different habitats, including wetland, alder/willow carr, steppe-like short grassland over slag, scrub and calcareous grassland. The site holds a wide range of breeding species and has attracted migrant birds, including rare species such as Penduline Tit, Lesser Grey Shrike, Golden Oriole, Red-footed Falcon and Nightjar. The northern part, once an area of significant ecological value, has already been destroyed under a waste disposal site and any further loss would be to the detriment of the Tees area.
 - **Potential Impacts on RSPB Saltholme:** The RSPB's new flagship reserve is only about a kilometre from the proposed development site and the EIA will need to assess the impacts (ornithological, visual and tourism (in terms of visitor perceptions/numbers)) on this important area. At present, it is one of the most popular visitor attractions in the Northern region (if not the most popular) and is a vital ecological and economic asset.
 - **Bird Assemblages:** The EIA must research the breeding, winter and passage bird assemblages on and adjacent to this important site and assess the impact of the development on these populations. The TBC holds full breeding bird records for the tetrad in which the development site is located and could provide this information to support the consultants' research, if requested.
 - **Potential Impacts on Middlesbrough and Middlehaven:** Middlehaven (formerly Middlesbrough Dock) is being developed by Middlesbrough Council as a major housing, leisure and commercial centre in the northern part of the town. The erection of 4 large wind turbines only a kilometre or so away may have significant visual impacts on this site and these will need to be appraised. Views from the north are at present dominated by the imposing Transporter Bridge, which gives a strong sense of place, and is impressively floodlit at night. The erection of 4 huge turbines may dwarf this historic structure and significantly reduce its impact. Similarly, with the view of the Cleveland Hills.
 - **Mitigation and Enhancement:** We consider these to be key elements of the ES. Many previous ESs we have appraised have included totally inadequate, low key mitigation and enhancement measures, compared with the environmental impacts, scale and capital cost of the developments concerned. On- and off-site enhancement opportunities should be considered and be of sufficient scale and ecological relevance to the area concerned (eg. replacing a destroyed wetland with a wildflower meadow is unacceptable in our view).

Ornithological Data

- 2.2 TBC holds a vast store of bird data and information relating to the Tees Estuary and has recently completed a year-long study of and Management Plan for the adjacent Dormans Pool SSSI, the first time such research has ever been carried out for this area. The report of this was issued in March 2009 and contains breeding and winter bird assemblages, as well as habitat/vegetation maps. TBC also has bird counts for Dormans Pool and the adjacent Reclamation Pond over and above the monthly WeBS counts, which will provide a much more complete picture of the year-round bird assemblages. We are willing to provide such data on request as part of the EIA research.

3.0 FUTURE CONSULTATION

- 3.1 Although not a statutory consultee, it is essential that TBC is consulted during the EIA in view of our knowledge of the Teesmouth area, the relevant information we hold and the contribution we can make to the process. We are also key stakeholders in the area, having an exclusive legal agreement with Impetus Reclamation Limited for TBC members' access to the adjoining Dormans Pool and Reclamation Pond, which lie on private land.
- 3.2 Our contact for future consultation is: **Ted Parker, 9 Morton Carr Lane, Nunthorpe, Middlesbrough, TS7 0JU (Tel: 01642 275369; email: ecarker@supanet.com)**