

Planning Inspectorate ref EN 610106 SUNNICA

Interested Party reference 20030660

Dear Mr Wheadon

Stone Curlew

Natural England have still produced no evidence to show the Stone Curlews in the Sunnica site are not part of the Brecklands SPA and their response indicates nothing will be forthcoming in the near future. To state the birds are not part of the SPA without producing any evidence is contrary to good scientific practice.

They have however already advised that regardless of the formal status of the link between stone curlews within the Sunnica proposed development and the SPA population, they expect that the compensatory habitat areas should still go ahead

The siting of the main mitigation area for the stone curlew on Sunnica East A is approximately 1 km from the substation, transformer, warehouse and office complex at Lee Farm- likely therefore to be the site of most frequent and noisy activity.

Natural England's own report (Breckland Special Protection Area (SPA) Site Code: UK9009201) (Appendix 1) notes the following:

A significant proportion of the Stone Curlew population in Breckland are known to nest outside the SPA; this is primarily on arable land. Nesting birds outside of the SPA boundary may form part of the wider population but are protected separately by Schedule 1 of Wildlife & Countryside Act, 1981 as amended, and / or SSSI protection if nesting within a SSSI.

Due to the mobility of birds and the dynamic nature of population change, the target-value given for the population size of this feature is the minimum standard for conservation/restoration measures to achieve (subject to natural changes).

Stone Curlew are known to be sensitive to human-related disturbance. Several research projects have looked at the impact of anthropogenic disturbance on the distribution of Stone Curlew nests in Breckland. The research found that Stone Curlews are highly susceptible to disturbance with active responses being recorded at distances of up to 500m from a dog walker (Taylor et al. 2007)¹.

A further study carried out by Sharp et al, 2008 found that Stone Curlew nest density was consistently lower on arable land around settlements up to a distance 2500m. This consistency across the whole study period (1988 - 2006) provides strong long-term evidence of some negative impacts or association of housing on Stone Curlew densities on arable land. Similarly, a significant avoidance of trunk roads was also found. The research was used to inform a

¹ TAYLOR, E. C., GREEN, R. E. & PERRINS, J. (2007) Stone curlews *Burhinus oedicnemus* and recreational disturbance: developing a management tool for access. *Ibis* 149:37-44.

comprehensive study undertaken by Breckland Council as part of the Habitat Regulations Assessment (HRA) of its Core Strategy. Date of Publication: 31 Aug 2022)

The Sunnica East B site overlaps the current SPA buffer zone, and it is recorded that curlews will travel up to 3km to feed², so pairs from the Breckland SPA are highly likely to be feeding in the Sunnica West area.

Not only that but Sunnica themselves recorded Curlews nesting in the Sunnica B area in 2019, 2020 and 2021, along with other pairs in Sunnica A in 2019 and 2020.

The stone curlews in our local area, alongside the other bird species adversely affected by the development, are greatly valued and appreciated by local people. This autumn a very large gathering of over 50 stone curlews was present on fields adjacent to the Sunnica proposed site at Isleham for several weeks, reinforcing the importance to this species of our local arable landscape, these birds will have probably originated from pairs breeding locally as well as elsewhere in the Brecks”

Unless NE can produce conclusive evidence that the birds are not part of the Brecklands SPA group the planning authority should assume that they are.

Natural England’s document titled **Building Partnerships for Nature’s Recovery** speaks of working with local communities, helping to protect England’s nature and landscapes for people to enjoy- something they have failed to do.

These failures by NE are significant, it is genuinely concerning that an extremely rare bird may be driven away from its regular breeding sites and good agricultural land lost to development due to a lack of scrutiny on the part of a statutory body.

Kind Regards

Anne Noble

² **Habitat selection, ranging behaviour and diet of the Stone Curlew (*Burhinus oedicnemus*) in Southern England**
Journal of Zoology 250 (J2) 161-183 Tyler and Bowden