

The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol, BS1 6PN



25th July 2023

To whom it may concern,

REF: Medworth Energy from Waste Combined Heat and Power Facility – Examination stage, Deadline 7 – Comments on any additional information / submissions received by Deadline 6

The RSPB has previously reviewed the application for the Medworth Energy from Waste Combined Heat and Power Facility in relation to the Habitat Regulations Assessment (HRA). At that stage, our concerns were around the new power lines, but these were found to be on a route without significant swan records. Since then, we have become aware of breeding Turtle Doves within the area of the proposed development. We therefore wish to make the following comments regarding the Proposed Development's Biodiversity Net Gain (BNG) calculations and habitat loss, specifically in relation to Turtle Doves.

Environmental Statement Chapter 11 Biodiversity Appendix 11M Biodiversity Net Gain Assessment – July 2023, Revision 5

The Turtle Dove is a globally vulnerable species (International Union for Conservation of Nature (IUCN)) and a red-listed Bird of Conservation Concern (BoCC). Since the 1970s the species has suffered a 96% decline in UK breeding territories (2021 National Turtle Dove Survey). This has been driven by two main pressures: unsustainable levels of hunting on their migration route, but most importantly, a lack of suitable breeding habitat (seed food, nesting habitat and accessible water) on their breeding grounds in the UK.

Turtle doves require three key habitats:

RSPB
Cambridgeshire, Bedfordshire
and Hertfordshire Area
The Grange
20 Market Street
Swavesey
Cambridge
CB24 4QG

Tel: 01954 233260
Facebook: @RSPBEngland
Twitter: @RSPBEngland
rspb.org.uk



The RSPB is part of BirdLife International, a partnership of conservation organisations working to give nature a home around the world.

- **Food** – A seed rich habitat with 30-60% bare ground and low vegetation (<15cm) to be able to access it. They only eat seed and unlike many farmland birds don't switch to eating insects in the breeding season. Turtle Doves feed on a wide variety of seeds of arable plants like chickweed and fumitory and brassicas like oilseed rape.
- **Nesting habitat** – Comprised of native species, such as Hawthorn, Blackthorn and Bramble, with climbing plants, like Dog Rose, can provide the dense and thorny nesting habitat (e.g., hedges and scrub) required by Turtle Doves for protection from the weather and predators. Alternative suitable nesting habitat can also be found in places like woodland-scrub edges or Conifers.
- **Accessible water** – Their seed-based diet is low in water content, and they need accessible water to be able to make crop milk for their chicks. This is usually recommended in the form of a pond with one shallow sloping side, but a range of water sources can be used as long as access is provided.

The 2021 Environment Act introduced a requirement for all new developments to deliver a 10% net gain for biodiversity, which will be made mandatory in November 2023. We welcome that the Applicant is committed to delivering a minimum of 10% BNG for the Proposed Development, but are aware this will largely be delivered by off-site measures, ~~of~~ which are ~~being~~ identified in Appendix 10.2C (unavailable on the National Infrastructure Planning portal).

When considering the habitat requirements for Turtle Doves, it is a concern that the BNG result indicates that the Proposed Development will result in an overall net loss of -9.98% in area-based units (e.g., scrub); a loss of -21.56% in linear units (e.g., hedgerow); and a loss of -11.85% in river units. In addition to this, the BNG result also fails 'trading rates for Medium distinctiveness habitats especially for scrub. We recognise that the assessment expects BNG for the Proposed Development to be delivered off-site, but at this stage, it is stated that the "mechanism for delivering this is yet to be defined".

Given that hedges and scrub can take around 15 years to mature and provide suitable nesting habitat for Turtle Doves, it is important to retain as much of this habitat on the Proposed Development site as possible. This would then also align with the emerging Fenland Local Plan's aim that all "opportunities to achieve net gain on-site must be fully explored to ensure that loss of biodiversity is avoided or minimised before options for off-site compensation are considered" (20.29). However, if this is unachievable, the below comments should be considered when developing off-site compensation habitat:

- Provide suitable nesting habitat, foraging habitat and accessible water within 300m of each other in areas where Turtle Doves are present. This will not only support Turtle Doves to have more breeding attempts per season, but benefit the fledglings, as they only travel up to 300m from the nest within the first

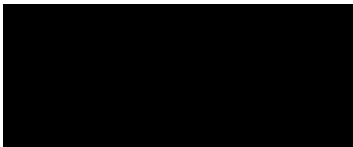
three weeks after fledging. If additional habitat for Turtle Doves was considered, this will also support additional provision of BNG and align with the emerging Fenland Local Plan to “encourage all qualifying development to provide a higher amount of BNG than the minimum 20% including in off-site locations where practical”.

- Consider sites within 10km of the Proposed Development, ideally with existing suitable habitat that could be enhanced for Turtle Doves. Adults have been known to travel up to 10 km to feeding areas. Therefore, if you can enhance current suitable habitat for Turtle Doves, all within 300m of each other, it will benefit both adults and fledglings and support biodiversity gains.

If you require additional information about habitat requirements and subsequent management, please do get in touch. Further information can also be found at: <https://www.operationturtledove.org/get-involved/habitat/do-you-manage-land/>.

We hope you find these comments useful. We would be happy to discuss anything further.

Kind regards,



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