14 July 2022

Our ref: NY7170 – Wallshield 2

Your ref:

Richard Pow
Forestry Commission
Newcastle Office

VIA EMAIL

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Hampshire Court
Newcastle upon Tyne
NE4 7YH

Tel: 02080265449

Dear Richard,

PROPOSAL: WALLSHIELD 2 - DRAFT BREEDING BIRD SURVEY RESULTS

Thank you for sharing the results of the draft Breeding Bird Survey (BBS) for the Wallshield 2 proposal commissioned by Forestry Commission to help inform the commissioner's decision on whether to uphold or reject the Northumberland National Park Authority's (NNPA) objection to the proposed scheme.

Natural England understands that the purpose of the survey is not to revisit the original EIA decision for the scheme, but to help determine whether or not state funds should be used to support new productive conifer woodlands at this site.

The results of the draft BBS, which was conducted in accordance with the revised survey guidance issued by FC on 21st December 2021, found that there were 2 pairs of curlew and 1 pair of snipe breeding within the proposed forestry site boundary and a further 6 pairs of curlew, 6 pairs of snipe and 1 pair of lapwing breeding within the 1km buffer area. At this location, curlew is the principal wading species of concern. The draft report considers the nos. of curlew within the proposed site and the buffer area to be of only parish level value.

Both curlew and lapwing are red listed wading bird species, while snipe is amber listed. The population of all three species of waders have declined in the last few decades with a particularly steep decline (48%) in curlew since the 1990s. The main reasons for the declines are complex, but significant among them are changes in agricultural practices, the loss of open habitats, and increases in predation levels often associated with land use changes such as new woodland creation. The UK has a special responsibility for the conservation of curlew in particular, as it holds approximately a quarter of the world's population of breeding curlew, and what happens to this species in the UK will have substantial consequences for the future of the species.

The draft BBS results clearly show that, for curlew, this location is a hot spot with good densities of breeding pairs. Further, it is situated within a much wider geographical area of open habitat which is known to support concentrations of breeding waders. The draft survey data indicates that the BTO's Wader Zonal Map (based on modelled data) score for curlew of 4-5 (i.e., the most important zone) corresponds with the prediction for this location. The proposal is located within the only English site (Geltsdale and Hadrian's

Wall) of the Curlew LIFE Project, led by the RSPB, which aims to reverse the decline of this species at 5 locations across the UK.

Natural England does not agree with the draft reports view that the location is of only parish level importance for breeding curlew as we believe the method used for this evaluation, which is based on data that is over 10 years old, does not fully represent the importance of the site. The most recent national analysis indicates that the typical curlew population density (in areas of suitable habitat) is now estimated to be 1-2 pairs per km^2 in the uplands of Scotland and Northern England where most breeding curlew are now concentrated (NE 2020 Climate Change Adaptation Manual). The draft BBS results puts the breeding density in this area firmly at the top end of the expected range. Additionally, the method of evaluation used does not allow for any real time incorporation of the cumulative impacts of land use change on the status of breeding waders thus giving a potentially misleading assessment of the situation at any given site.

Part of this specific location was removed from the original Wallshield 1 application in 2014 because of concerns raised by both NE and RSPB relating to the detrimental impact that the then proposal was likely to have on breeding waders in an area that had been supported by state funding, designed to improve breeding wader habitat, through continual agri-environment schemes for well over a decade. The reasons for the concerns raised back in 2014 are still extant (i.e., high numbers of breeding curlews persisting in the area), which justifies the considerable state funds spent supporting farmers in this area to help positively manage breeding wader habitat.

It is Natural England's view that the proposed woodland creation at this sensitive location is likely to have a significant negative impact on the breeding curlew population both directly in the short term, through the loss of two breeding territories, and indirectly in the medium to long term, as a result of decreased reproductive success caused by the increased predation rates associated with close proximity to woodland.

The establishment of a new productive conifer woodland at this location will not help to fulfil the duties of state bodies to conserve biodiversity, as set out in the Natural Environment and Rural Communities Act 2006, or to further the government's ambition to halt species decline by 2030 as per the Environment Act 2021.

In light of all of the above, Natural England believes that it would not be appropriate to spend state funds to support the creation of new productive conifer woodlands at this location. To do so would not just have a negative impact on breeding waders, but also from a value for money perspective as the proposed scheme is likely to further negate the public funds that have been, and continue to be, invested in securing appropriate land management practices to help maintain the long-term viability of the breeding wader populations in this area.

Should you have any queries regarding the content of this letter, please do not hesitate to contact me.

Yours sincerely

ROBERT CUSSEN
Senior Advisor
Northumberland Team