



Burnet Heritage Trust: Additional comments to Planning Inspectorate, April 2025

Document compiled by [REDACTED] on behalf of Burnet Heritage Trust

1. Introduction

1.1 The Burnet Heritage Trust

The Burnet Heritage Trust (BHT) is a small wildlife conservation charity engaged in the preservation, conservation, and public access of highly biodiverse damp grasslands in the Humberhead Levels. The Trust currently owns over 25 acres of lowland riparian wetlands along the River Went at Topham, which is immediately adjacent to the proposed Fenwick Solar site. The trust liaises with landowners regarding the sensitive management of another 70 acres. The trust has begun to provide increased public amenities at Topham, including a permissive footpath and a publicly accessible bird-watching hide.

Our trustees include a professional ecologist with extensive practical knowledge of the region, a PhD ecologist with an extensive track record of both international research publications and conducting baseline surveys for clean energy infrastructure, and a countryside access officer.

1.2 Failure to incorporate or address any previous concerns

The Trust has attempted to engage with BOOM Power from the perspective that, despite the scale of the proposed development and its proximity to the BHT's holdings, it is possible to create a project that has an overall benefit to both biodiversity and the local community. We aimed to remain open-minded that this could be achieved through sufficient ecological mitigation measures.

During extensive pre-statutory consultation meetings, BHT presented various concerns and potential mitigation measures to BOOM (see document: EN010152-000293-Fenwick Solar Farm_BHT_Statutory Consultation Response 20.05.24.pdf). It is the position of BHT, that not a single additional suggestion or additional ecological mitigation measure was implemented between pre-statutory consultation and submission to the planning inspectorate. Whilst we did not expect the adoption of all our suggestions, we are disappointed by the approach BOOM has chosen to adopt.

In the period since submission to the Planning Inspectorate, we have attempted to allay our concerns through the Statement of Common Ground procedure. However, at each

stage of this process, our statements and concerns have simply been redirected to BOOM's PINs submission.

2. Major outstanding concerns

2.1 SSSI-equivalent status of adjoining land not acknowledged

Whilst the area around Topham has not yet formally been awarded SSSI status, the BHT has submitted documentation to Natural England demonstrating that the site qualifies as SSSI based on the criteria for "Lowland Damp Grassland" and "Lowland Open Waters and their margins" (see accompanying Document; **BHT SSSI application**). That these areas meet SSSI-level thresholds was previously demonstrated to BOOM at the pre-statutory consultation stage. The trust requests that an appropriate assessment be presented to the Inspectorate, assessing impact on the basis that the BHT submitted application should be effectively considered SSSI and treated as such in all assessments.

2.2 Functionally linked land and bird populations

The BHT supports the position of Natural England that despite "*the claim in section 5.3.7 [of the 7.12 No Significant Effects Report [APP-201]], it should be noted that the total area of smaller sites that support SPA birds could in combination support in excess of the 1% 'rule of thumb'.* Whilst NE state that "*this is not anticipated to fundamentally affect the outcomes of the assessment*", it is the position of BHT that one or more species exceeds >1% (most notably Eurasian Marsh Harrier and Eurasian Teal) of the totals of the Humber Estuary SPA / RAMSAR and that totals of the former may approach nationally significant levels given appropriate survey methodologies (see following sections for more detail).

2.3 Specific species information

2.3.1 Eurasian Marsh Harrier

At the last assessment (2015) the Humber Estuary SPA / Ramsar population of Marsh Harrier *Circus aeruginosus* was around 27 pairs. Despite a ~36% population increase 2008-2018, at most the Estuary does not exceed 50 pairs. In this context, the observation of up to 4 individuals on the proposed Fenwick site constitutes ~4% of the Humber Estuary RAMSAR population. It is important to note that, given their wide-ranging feeding habits, it is unusual to note significant counts of non-breeding Marsh Harrier together away from evening roost sites, even where they occur at high densities. Therefore, without systematic assessments of nearby roost sites, observations of four individuals on a single visit likely represent a significant under-counting of the number of individuals utilising the area. As such it is not unreasonable to suspect that as many as a dozen birds

(i.e >1% of the national population) utilise the DCO area. No additional appropriate assessment targeting this species is mentioned in the applicant's report.

Natural England has also flagged this in the context of site size and BHT regards the following quote from (**EN010152-000277-EN010152 Fenwick Solar Farm - Natural England Relevant Representations 23.01.25 Final [RR-006]**) highly relevant in this context:

“For information, Natural England has generally advised that if $\geq 1\%$ of a Humber Estuary bird species population could be affected by a proposal, alone or in combination with other plans or projects, then further consideration is required. However, where species are particularly vulnerable due to declines in the Humber population, then it may not be appropriate to rely on the 1% of the estuary population as the critical threshold. Mitigation measures may be required where lower numbers of vulnerable species are using a site that is proposed for development.”

2.3.2 Eurasian Curlew

The BHT has repeatedly raised concerns that 2 pairs regularly breed around the North-eastern section of the Fenwick Solar site DCO. This area previously consisted of semi-improved permanent pasture until autumn 2022 when the site was illegally sprayed and ploughed. This action by the farmer was apparently an unfortunate coincidence with the lease approach for the site by BOOM, but should, in the view of the trust, be considered a disruption of the true ecological baseline state of the site, before the influence of the proposed NSIP. BHT is happy to provide evidence demonstrating the previous habitat context, the timing of conversion, and that complaints were made by both BHT and Don Valley Rivers Trust (DVRT) to Natural England at the time.

Despite the sudden change in habitat, Eurasian Curlews have continued to hold territory on the site. This, for some reason, has not been registered during breeding bird surveys, besides a single record in April 2023 (**Volume III, Appendix 8-7 Breeding Bird Report [APP-152]**). Two additional Curlew recorded in March 2024 are considered as non-breeding birds, despite the species arriving on the territory in early March and laying eggs by mid-April (**6.3 Environmental Statement - Volume III Appendix 8-8: Non-Breeding Bird Report. [APP-153]**)

Given that this is a large-bodied, obvious species which ecologists from BHT continue to hear and see regularly within the DCO area (despite observing from outside), we are struggling to explain how this species could not have been regularly observed. As of March–April 2025 Eurasian Curlew display call has continued to be heard emanating from within the site DCO on every single visit to adjacent areas.

Despite stating repeatedly in non-statutory consultation with BHT that 2022 would be assumed as the environmental baseline for the scheme, BOOM most recently stated during SOGC consultation that “[Eurasian Curlew habitat] is currently absent from the site as evidenced by the change in land use from grassland to arable.”

Given that Eurasian Curlew populations vacate the Fenwick area August-February, it is likely that this breeding population is functionally linked to that of the Humber Estuary SPA and RAMSAR site, as is demonstrated by ringing recoveries of breeding birds in nearby East Yorkshire.

2.3.3 Pink-footed Goose

Whilst the applicant notes a few records of Pink-footed Goose, both within the DCO and survey area, the BHT believes, based on more extensive recording, that much larger numbers have used the DCO area in certain years, depending on crop rotations and available pasture. Even within the short recording statutory recording period, the species was recorded in a reasonable number utilising the area. For example, in October 2023 “a flock of 28 individuals in a pasture field in the northeast of the Order limits and a flock of 39 individuals in an arable field in the south of the Order limits”. **(6.3 Environmental Statement - Volume III Appendix 8-8: Non-Breeding Bird Report. [APP-153])**

Despite no reported survey work after Sept 2024, up to 770 birds were present for two weeks in the survey area (just outside the DCO area) between 2nd and 15th October 2024, ranging from Topham to Southfield Reservoir (data available from www.doncasterbirding.co.uk).

Given the number seen regularly flying over and dropping down within the DCO, it is likely that these birds were regularly feeding within the DCO area. At least 300 were observed dropping onto the DCO area from Topham on 14th October 2024 (www.ebird.org Checklist S19891715), with a total of 3500+ flying over (either continuing or potentially landing). A significant proportion of these birds roost around the Humberhead Levels NNR and the Humber Estuary SPA & RAMSAR, suggesting an important contribution to the functionally linked populations. Maximum roosting totals include 6,000 on Thorne Moors NNR (www.ebird.org Checklist S121158258), 12,000 on Hatfield Moors NNR (www.ebird.org Checklist S121442283), and 24,000 on Read’s Island RSPB within the Humber Estuary SPA & RAMSAR site (www.ebird.org Checklist S198652369).

Considering these sightings, it is the view of the BHT that the DCO area constitutes a periodically important foraging area for the Pink-footed Goose population of the region, with potentially as much as 0.6% of the UK population (7% of the Humber Estuary SPA / Humberhead Levels NNR population) using the area as an important stopover.

2.3.4 European Golden Plover

During a single winter of coverage 2023-24, a flock of 35 birds was recorded on the ground within the DCO limits. This is more than at the East Yorkshire Solar Farm, where a single flock of 30 birds was recorded. However, the species is “nomadic [...] during winter in response to annual variations in crop rotations and weather conditions.” Similar areas of arable farmland, such as around Southfield Reservoir, where access is available and

observer coverage is regular recorded totals of up to 4000 birds and annual winter totals of at 100+ each year, suggesting regular coverage would reveal more substantial numbers around the DCO (www.ebird.org Checklist S79356651).

2.3.5 Eurasian Teal

Winter totals identified during the non-breeding bird survey (**6.3 Environmental Statement - Volume III Appendix 8-8: Non-Breeding Bird Report. [APP-153]**) include a peak of 310 individuals, whilst counts on the adjacent land at Topham have exceeded 190 birds on several occasions. Totals at Norton Common (<2km West of the DCO limits) have also exceeded 300. A total of 310 would represent over 5% of the Humber Estuary SPA population, to which these birds are very likely functionally linked.

2.3 Significant and frequent errors in ecological assessment

The number of systematic and consistent errors in the breeding bird assessment is a serious cause for concern. These range from complete misunderstandings of species habitat requirements to utterly inexplicable omissions and undercounts of species. The following is a list of examples identified by the BHT in a short appraisal and should in no way be considered an exhaustive list of errors. Several ecological misunderstandings are also stated, for example

Cuckoo – “the habitat within the Order limits is not suitable to support these species”.

Volume III, Appendix 8-7 Breeding Bird Report [APP-152]).

The species hosted include Meadow Pipit and Dunnock, both of which are common breeding species within the order limits, and the listed habitats include ‘Meadows’ (including improved grassland – Payne et al., 2020). Ecologists from BHT have seen Cuckoo foraging within 20m of the edge of the order limits, and birds wander significantly when foraging: “*Female may forage 2–3 km from laying sites; male feeds at up to 4 km from singing site*” (Payne et al., 2020).

We are similarly perplexed by the Breeding Bird Report Annex C Data Search Records from within 2 km. Not a single species (even ubiquitous birds such as Blue Tit) was found within 2km of the data search more recently than 2018. This suggests either a fundamental error or potentially the omission of material shared by BHT with BOOM. A detailed, database of over 10,000 records of 150 species (2 hidden due to species sensitivity) recorded with 300m of the DCO limits has been signposted to BOOM multiple times at the non-statutory consultation stage (summary data freely accessible here: www.ebird.org Hotspot L1582647); full data easily available on request), none of these records appear to be reflected in the material submitted to the Planning Inspectorate. A further 15,000+ ornithological records are also publicly available via the same platform for the site at Norton Common (www.ebird.org Hotspot L9892249).

In the view of BHT, several field assessments of commoner species, such as those for the number of Meadow Pipit territories in the study area (12), are simply implausibly low, even for areas of intensive agriculture. The undercounting of breeding birds appears systematic and is a cause for concern.

2.4 Approach inconsistent with mitigation for other similar Nationally Significant Infrastructure Projects

The totals of Pink-footed Goose observed foraging within the proposed Fenwick solar site DCO are markedly higher than those noted at the East Yorkshire Solar Farm, where over 203 acres (82 ha) were explicitly designated as ‘Goose Mitigation Zone’ (Non-breeding bird survey: **EN010143-000304-6.2 Appendix 8-6 Survey Report for Non-Breeding Birds.pdf [APP-089]**, Site plan with indicative goose mitigation zone: **EN010143-000352-6.3 Fig 2-3 Indicative Site Layout.pdf [APP-138]**).

At the 3000-acre East Yorkshire Solar Farm, an additional 130 acres (53 ha) have been provided as ‘Golden Plover mitigation’. This non-breeding bird survey also revealed fewer birds having been recorded within the limits of the DCO (30 individuals; **EN010143-000304-6.2 Appendix 8-6 Survey Report for Non-Breeding Birds.pdf [APP-089]**) than at the Fenwick site (35 individuals; **6.3 Environmental Statement - Volume III Appendix 8-8: Non-Breeding Bird Report. [APP-153]**)

The similarly sized Cleave Hill solar farm created 139 acres (56 ha) of ecological mitigation for overwintering Geese, Golden Plover, and Marsh Harrier (**Cleave Hill Solar Farm 6.4.5.2 Environmental Statement - Landscape Biodiversity Management Plan [APP-203]**). It is the position of the BHT that the Fenwick solar farm lies adjacent to similarly important bird communities and populations, as demonstrated by the species breakdown presented here.

Given the levels of mitigation offered for similar schemes elsewhere, and the high abundance of nationally and regionally threatened species (Eurasian Curlew, Marsh Harrier, Pink-footed Goose, Golden Plover), it is the position of BHT that the current ecological mitigation provisions are far below the expected level for such a large scheme. Additionally, the scheme is close to important wetlands and land supporting SSSI-level bird communities, which is functionally linked to populations of threatened birds within nearby SPA and RAMSAR sites.

Misrepresentation of claimed Biodiversity Net Gain

In our non-statutory consultations with BOOM we highlighted how Biodiversity Net Gain is understood as a poor measure when applied to Solar Farm projects, since biodiversity gain can be claimed for land under solar panels without reference to the actual conditions of the habitat immediately beneath the panels, particularly the effects of shading (Rampling et al., 2024). We are disappointed by BOOM’s response to this which

is to refer to a statement within guidance from the Building Research Establishment (BRE), which is unrelated to how Biodiversity Net Gain is assessed, but simply a context statement provided in a guidance document for sustainable approaches to building. Additionally, the quote has been removed from its context, with only the italicised section included in **7.11 Biodiversity Net Gain Assessment [APP-200]**.

“Normally only 25-40% of the surface is oversailed by panels. Because panels are raised above the ground on posts greater than 95% of a field utilised for solar farm development is *still accessible for plant growth and potentially for wildlife enhancements and complementary agricultural activities such as conservation grazing.*”

Recent examinations caution against the inclusion of areas under panels within any assessments of Biodiversity Net Gain. Rampling et al., (2024) state the following regarding biodiversity gains on solar farms in relation to the Net Gain framework:

“the success of such biodiversity interventions is highly dependent on species shade tolerance (Lambert et al., 2022), the project's vegetation management regime, and the availability of resources for long-term monitoring (Remazeilles et al., 2022). In addition, initial avoidance of damage to biodiversity-rich land cover is the most reliable and cost-effective way to reduce biodiversity risk of solar farms (TBC, 2020).”

The entire basis of the Fenwick scheme's claimed 10% Biodiversity Net Gain rests on the basis that the land under the panels itself represents biodiversity uplift. In fact, of the proposed scheme's 831.61 biodiversity units a total of 517.46 units will come from “Other neutral grassland” (i.e 62 %). From this 415.98 units (47.27ha) is of “Other neutral grassland” retained from before the baseline of the scheme (**7.11 Biodiversity Net Gain Assessment [APP-200]**). Of this, around 50% is shown on plans as being oversailed by panels, and as such, is unlikely to deliver significant biodiversity gains.

Incredibly, the same area of grassland is also considered “change[d] in land use from grassland to arable” according to BOOM's proposed SOCG regarding suitability for Eurasian Curlew. The vast majority of this 47.27 ha was converted to arable in Sept 2022. It was heavily sprayed with herbicide and ploughed to around 9 inches in depth (for the first time in over 25 years), destroying the grassland flora (Fig. 1). This occurred after the lease agreements between BOOM and landowners were arranged. While the trust does not believe that BOOM necessarily had the power to affect this change in land use, it seems likely that the changing incentive structures of a forthcoming long-term lease may have played a part in the conversion. Even with proper management, the recovery of a similar floral community can take up to 20 years (Walker et al., 2004).

Document **7.11 Biodiversity Net Gain Assessment [APP-200]** lists the BNG good practice principles for development and states that assessment “has adhered to this step-by-step process to ensure that good practices are followed”. These include being inclusive, equitable, and transparent, producing the best outcomes for biodiversity, and

seeking outcomes that are both additive and have a lasting impact (see **7.11 Biodiversity Net Gain Assessment [APP-200] – Appendix E**).

It is the position of the BHT that these principles have not been met.



Fig. 1 The aftermath of Sept 2023 deep ploughing of ‘neutral grassland’ which BOOM claims as retained ‘Neutral Grassland – other’ under the Biodiversity Net Gain framework – photo [REDACTED]

3. Suggested additional mitigation

The trust is of the view that through the following actions, it would be possible to provide adequate ecological and amenity mitigation of the whole scheme. The geographic context and further details of these suggestions are provided in Figures 2 and 3.

- I) An additional 39ha of mitigation adjacent to most sensitive areas (7% of the total 540ha footprint of the scheme in a context where an expansion of ~190ha between scoping and pre-application has already taken place).
- II) Engagement with BHT to effectively manage areas of ecological mitigation in a way that maximises biodiversity.
- III) Creation of a new (screened) permissive footpath through the Solar Farm, linking to the existing public footpath network and facilitating connection of Fenwick, Topham and Sykehouse away from busy highways and creating a new public amenity.
- IV) A new community amenity in the form of a bird hide overlooking newly created scrapes, which BOOM has committed to.
- V) A commitment to work with BHT and YWT to ensure that mitigation areas are protected in perpetuity at the decommissioning stage of the scheme.

- VI) Management of the overall site in consultation with BHT and other conservation organisations, with provisions for planting (and repeated replanting of) nectar and wild seed mix strips as well as comparatively reduced stocking levels to allow for both panel maintenance and biodiversity enhancement.



Fig. 2 Existing AECOM plan of the site with additional mitigation areas (green starred, black outline) added.

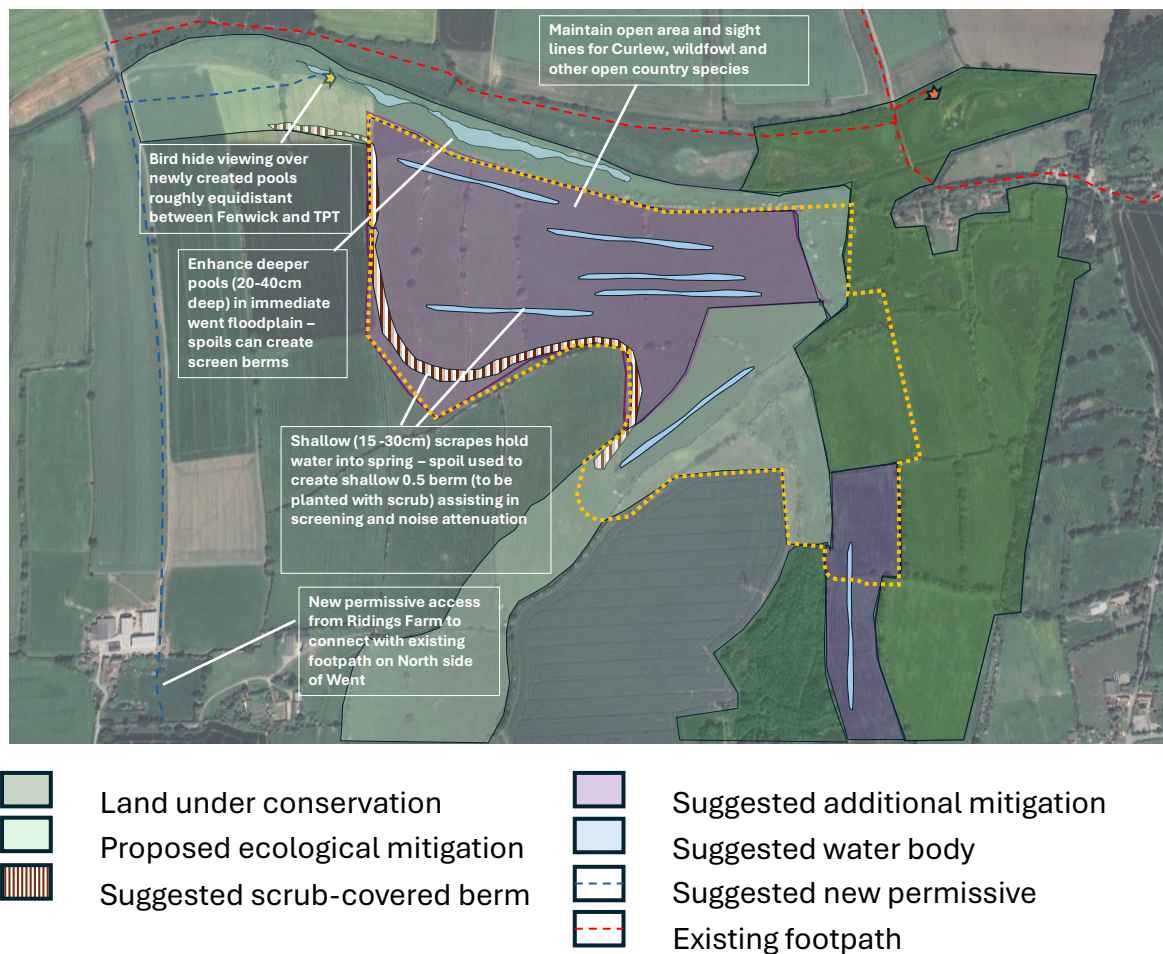


Fig. 3 Proposed additional mitigation measures resulting in enhanced public amenity and real-world biodiversity gain.

References:

Lambert, Q., Gros, R., & Bischoff, A. (2022). Ecological restoration of solar park plant communities and the effect of solar panels. *Ecological Engineering*, 182, 106722. <https://doi.org/10.1016/j.ecoleng.2022.106722>

Payne, R. B., D. A. Christie, and G. M. Kirwan (2020). Common Cuckoo (*Cuculus canorus*), version 1.0. In *Birds of the World* (J. del Hoyo, A. Elliott, J. Sargatal, D. A. Christie, and E. de Juana, Editors). Cornell Lab of Ornithology, Ithaca, NY, USA. <https://doi.org/10.2173/bow.comcuc.01>

Rampling, E. E., Zu Ermgassen, S. O., Hawkins, I., & Bull, J. W. (2024). Achieving biodiversity net gain by addressing governance gaps underpinning ecological compensation policies. *Conservation Biology*, 38(2), e14198.

Remazeilles, A., Montag, H., Carvalho, F., Parker, G., & Howell, B. (2022). Applying Biodiversity Net Gain to solar parks in the UK. EGU General Assembly.

TBC (The Biodiversity Consultancy). (2020). Solar energy: Managing biodiversity risks. The Biodiversity Consultancy.

Walker, Kevin J., Paul A. Stevens, David P. Stevens, J. Owen Mountford, Sarah J. Manchester, and Richard F. Pywell. "The restoration and re-creation of species-rich lowland grassland on land formerly managed for intensive agriculture in the UK." *Biological conservation* 119, no. 1 (2004): 1-18.

To whom it may concern.

Ref: Fenwick Solar Farm NSIP (Reference EN010152)

The Burnet Heritage Trust submitted relevant representations on 21/01/25 and has registered as an interested party concerning the Fenwick Solar Farm project.

Trustees were unable to attend the Open Floor Hearing on 19/03/25; however, in response to an email enquiry to PINS on 20/03/25, a PINS Case Officer advised that we could offer a post-hearing submission.

Therefore, please accept the attached information as additional representation from the Burnet Heritage Trust. We have also attached the Trust's SSSI status submission to Natural England in support of our representations.

The Trust would like to request an Issue Specific Hearing relating to ecological impact and mitigation, and to suggest that YWT and Natural England also be invited to attend.

We have copied the applicant to this email, as the attached representation and SSSI submission provide the additional detail requested concerning our initial response to the draft Statement of Common Ground. We trust this information will be constructive in achieving further common ground.

We'd be grateful if the applicant could confirm receipt of this information, and if you could confirm acceptance of our representations and request for an Issue Specific Hearing.

Thank you for your time

Kind Regards



Trustee, The Burnet Heritage Trust

Application for SSSI status: Topham Ferry Flashes & area



Photo: A female Northern Shoveler with seven near-fledged juveniles on the Topham Ferry Ings June 2024



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1. Introduction

This document is prepared by [REDACTED] of the Burnet Heritage Trust for submission to Natural England. It is designed to demonstrate that the rich biodiversity of the Went Ings around Topham Ferry Bridge (henceforth 'Topham Ferry Flashes') meets the criteria for designation as a SSSI. Initial submissions are for the designation of this area on the basis of both bird communities of 'Lowland Damp Grassland' and 'Lowland Open Waters and Their Margins.'

2. Background

2.1 Potential area

The current potential designation application consists of 289 acres of lowland riparian grassland along the River Went, together with a series of small ponds and wetlands between the Fleet Drain and disused railway embankment at Topham. The areas form a single contiguous unit of habitat, where sympathetic management has been ongoing for more than two decades, resulting in a particularly well-preserved biodiversity.



Figure 1. Map showing the location of proposed SSSI, to the North-west of Sykehouse village (53.6489755,-1.0640457)

2.2 Landowner support

The outlined areas are owned by multiple landowners outlined in Table 1. Areas with uncertain / unknown landowner support are included where they represent functionally linked land for the breeding of certain species (Eurasian Curlew, Garganey). Whilst the final boundaries of the site can be altered prior to designation through consultation with Natural England and other stakeholders, the Trust regards the area provided as the most ecologically coherent management unit in terms of ensuring the continued conservation of the targeted breeding bird species for which SSSI designation is sought. Whilst The Burnet Trust realises that landowner support is not required for SSSI designation, we believe the high degree of support the trust currently receives from local landowners will be advantageous in delivering improved ecological conditions in future.

Table 1. Landowner support for SSSI designation as currently understood by Burnet Heritage Trust in April 2025 (Table 1).

Landowner	Area owned (acreage)	<u>Current support for SSSI designation (April 2025)</u>
Burnet Heritage Trust	37	Full support
[REDACTED]	12	Full support
[REDACTED]	9	Full support
[REDACTED]	58	Provisional support
[REDACTED]	26	Provisional support
[REDACTED]	6	Unknown
[REDACTED]	13	Unknown
[REDACTED]	66	Unknown
[REDACTED]	33	Unknown
[REDACTED]	3	Unknown
[REDACTED]	26	Unknown

2.3 Existing visitor facilities

A 50m permissive footpath and bird hide has been provided by the Burnet Trust overlooking Topham Ferry Ings at 53.6505158,-1.0640917. The Trans Pennine Trail and other public footpaths run through the sites, providing excellent public access without potential for disturbance to wildlife.

3. Qualifying criteria

3.1 Thresholds for SSSI designation

The site scores as follows based on the current JNCC criteria for SSSI for breeding birds of 'Lowland Damp Grasslands', with the listed species present in all the last three surveyed breeding seasons 2022-2024 (Table 2)

<u>Lowland Damp Grassland</u>	<u>Score</u>
Mute Swan	3
Gadwall	3
Eurasian Teal	3
Eurasian Curlew	2
Garganey	4.5
Northern Shoveler	3
Common Cuckoo	2.5
Grey Heron	3
Grasshopper Warbler	3
Little Egret	3
Sedge Warbler	1
Reed Bunting	1
Threshold: 25	Total site score: 32

In addition, the site scores as follows based on the current JNCC criteria for SSSI for breeding birds of 'Lowland Open Waters and Their Margins', with the listed species present in two of the last three surveyed breeding seasons 2022-2024. (Table 3)

<u>Lowland Open Waters and their margins</u>	<u>Score</u>
Greylag Goose	2
Mute Swan	3
Water Rail	3
Gadwall	3
Eurasian Teal	3
Garganey	4.5
Northern Shoveler	3
Tufted Duck	2
Common Cuckoo	2.5
Common Kingfisher	3
Little Egret	3
Grey Heron	3
Cetti's Warbler	3
Grasshopper Warbler	3
Little Grebe	3
Sedge Warbler	1
Marsh Warbler	6
Reed Warbler	1
Reed Bunting	1
Threshold: 47	Total site score 53

3.2 Species statuses and documentation

For each species listed as contributing to the qualifying threshold, the summer presence and breeding status between 2002-2004 is detailed below (Table 4)

<u>Species</u>	<u>Breeding status 2022 - 2024</u>	<u>Documentary evidence</u>
Greylag Goose	Successfully fledged young in 2023 and 2024, present throughout the summer months in all years	https://macaulaylibrary.org/asset/154254131
Mute Swan	Last successfully fledged young 2022. Breeding attempted in 2023 and 2024	
Water Rail	Singing throughout spring in 2022, 2023 and 2024. Present throughout the year.	
Gadwall	Present throughout the spring in 2022, 2023 and 2024. Young seen in 2023 and 2024	
Eurasian Teal	Present throughout the spring in 2022, 2023 and 2024.	
Garganey	One spring sighting in 2022. Present in summer in 2022 and 2023 for extended periods (2+ weeks). Three well-grown juveniles present in late summer 2024	https://macaulaylibrary.org/asset/608281723
Northern Shoveler	Present throughout the spring each year. Young seen and photographed 2022 and 2024	Photo of adult with juveniles: https://macaulaylibrary.org/asset/621509886
Tufted Duck	2-3 pairs breed each year. Young seen 2022, 2023, 2024	
Common Cuckoo	2 or more birds hold territory throughout the spring each year	Photo: https://macaulaylibrary.org/asset/621509915 , Recording of Song: https://macaulaylibrary.org/asset/578950741
Common Kingfisher	At least one pair regular feeding on Topham Ferry lngs in spring 2022, 2023, 2024. Adults observed displaying and carrying food on Topham Ferry lngs on several occasions	Photo of adult in May: https://macaulaylibrary.org/asset/452802961
Little Egret	Multiple adults in breeding plumage feeding on Topham Ferry lngs in spring and summer each year.	
Grey Heron	Present throughout the year and utilised by foraging birds likely breeding nearby	
Cetti's Warbler	Newly colonised in spring 2024 and recorded throughout 2025 with two individuals holding territory.	
Grasshopper Warbler	Sing bird held territory for 14+ days in 2021, 2022 and 2023 on both Fleet lngs and Topham Mere. Insufficient coverage spring 2024 targeting this species	https://macaulaylibrary.org/asset/578965391
Little Grebe	Two pairs breed each year. Young seen in all years	1st year in October: https://macaulaylibrary.org/asset/278392051

Sedge Warbler	3-5 territories in each 2023, 2023 and 2024	https://macaulaylibrary.org/asset/519524301
Marsh Warbler	One held territory from 30th May 2023 until at least 20th June, with a second bird present on at least one date. Singing again on a single date in June 2024.	Not publicly available due to the sensitive nature of the species. Contact [REDACTED] for photos and sound recordings.
Reed Warbler	As many as 10 territories between Topham Mere, Topham Ferry Ings and Fleet Ings	https://macaulaylibrary.org/asset/242670051
Reed Bunting	At least 3-5 pairs each spring	
Curlew	One pair regularly bred on the fields to East of Topham Ferry Farm (on proposed Fenwick Solar Farm site). The territory was held again in 2025.	https://macaulaylibrary.org/asset/633761255

3.3 Full species inventory

See: <https://ebird.org/hotspot/L1582647/illustrated-checklist>

N.B. This output excludes documentation of breeding Marsh Warblers and wintering Long-eared Owls, which have been excluded due to possible sensitivity to disturbance by the public.

3.4 Survey completeness

Regular spring visits (March – June) in 2002 (7), 2023 (13) and 2024 (15), although with some periods poorly covered (e.g no visits 16/04/24 – 11/06/2024). Each visit lasted no more than two hours. Land around Topham Ferry Ings, Fleet Ings and Topham Mere generally received the most coverage. No direct access to Northeast corner of proposed site boundary (Fig. 1)

3.5 Other taxa

At this time the Burnet Heritage Trust is only able to apply based on the bird community of the site. However, it is suspected that, based on forthcoming surveys, the area is likely to qualify for SSSI status based on both botanical and entomological interest in addition to the ornithological interest.