

Submission ID: S7AC5A5C4

Please find attached comments and requests for further responses from Applicant and Natural England with regard to Badgers and potential impact on our neighbouring farm.

EN010163 – Steeples Renewables

Mr & Mrs Barlow

We have a herd of 30 native, **Original Population Lincoln Red Cattle** (The Windmill Herd). This is a closed suckler herd with the main objective of Conservation Breeding.

The Original Population consists of the few blood lines that remain pure, preserving the breed's historical traits. The cattle graze land and are housed over winter immediately adjacent to the proposed development.

1. Lincoln Red Original Population – Rare Breed at Risk

The Lincoln Red Original Population is one of the UK's rarest native cattle lineages. The Rare Breed Survival Trust class the Lincoln Red Original Population as rare and vulnerable, at risk and endangered. The breed is recognised by DEFRA on the Breeds at Risk (BAR) list. There are less than 10 herds of original population Lincoln Red cattle left in the UK today and the loss of even a few animals to TB could have a disproportionate impact on the national gene pool. This would be a policy conflict with the government's 2026 Native Breeds Support goals by endangering a vulnerable genetic pool. The Windmill Herd's biosecurity is required to maintain the 100% native bloodlines crucial to the breed's survival and to prevent the extinction of these rare genetic bloodlines.

2. Bovine TB, Badger translocation and perturbation

Sturton le Steeple and North Leverton are in an Edge Area for DEFRA bovine TB Testing. This requires testing on an annual basis. Since the establishment of the Windmill Herd in 2007 there has never been any cases of Bovine TB or Inconclusive Reactors within the herd.

The movement or disturbance of badger setts causes perturbation (displaced badgers roam further, significantly increasing the risk of TB transmission).

It is documented (Dorset Wildlife Trust) that disturbing badgers can disrupt their stable social structures and territorial boundaries, causing them to range more widely and come into contact with other badgers and cattle herds they would not normally interact with.

Stressed or displaced badgers may be more likely to frequent farm buildings or grazing areas, increasing the chances of direct or indirect contact with cattle.

Badgers can transmit bovine TB via contaminated faeces and urine on pasture or in feed/water sources. Increased, uncharacteristic movement patterns can lead to new areas of contamination.

3. Proposed Landscape and Environmental Management Plan and Mitigation

We note from EN010163-000100-6.3.7 Appendix 7.14 Outline Landscape and Environmental Management Plan 2.5, states that badgers are present throughout the site (of the proposed development) and we are in full agreement with this statement.

Natural England in their response EN101063-00301 NE11 state *"The project design principles include the avoidance of impacts to protected species as far as possible, to avoid the need for mitigation & protected species licencing, which is welcomed."*

It is noted that since our Section 42 comments, licences for bats and great crested newts are not likely to be required. As a result, the only species licence requirement reported in the ES appears to be for Badger: 'A badger development licence is likely to be required for temporary impacts to a small number of setts' (ES paragraph 7.8.165 & P147 (Appendix 4: Table 7.9)).

If avoidance and appropriate buffering of all setts is not possible, a licence will be required, and we would recommend that a draft protected species licence application is submitted to enable Natural England to issue a Letter of No Impediment (LoNI). This will provide the planning inspectorate with certainty during examination that impacts to badger can be mitigated.

To date, Natural England have not received a draft protected species licence application for badger.

A draft protected species licence application could be submitted to Natural England for Badgers. Cost incurred for this could be recouped from the existing DAS contract between Natural England and the Applicant."

4. Policy Conflict

The project potentially conflicts with the government's 2026 Native Breeds Support Framework by endangering a vulnerable genetic resource.

Government (DEFRA TB Eradication Strategy, PINS Habitants Regulations Assessment, Protection of Badgers Act) and Natural England planning guidance specifically advise against translocation because of risk of spreading bovine TB.

5. Disclosure Request

As an adjacent landowner with a concern about the TB risk, we would request formal access to the Applicant's confidential report to see what exactly is proposed for the setts bordering our land and the Natural England Draft Mitigation Licence

6. Conclusion

The re-location of badgers and their setts should not be permitted given the cumulative effect of this and other projects and the risks it poses to the Windmill Herd. Translocation must be avoided and as such mitigation should not include the moving of badgers as this could risk the spread of bovine TB.

The priority should be that the badgers that are resident in the development area should be kept in-situ rather than re-location to protect our herd.

The displacement of wildlife (badgers in particular) poses an unacceptable and irreversible biosecurity threat to the Windmill Herd.