**From:** Julian Jones - RWT   
**Sent:** 22 September 2017 10:56  
**To:** Caroline Moscrop ([caroline.moscrop@cyfoethnaturiolcymru.gov.uk](mailto:caroline.moscrop@cyfoethnaturiolcymru.gov.uk)) <[caroline.moscrop@cyfoethnaturiolcymru.gov.uk](mailto:caroline.moscrop@cyfoethnaturiolcymru.gov.uk)>  
**Cc:** 'Drewett, David' <[David.Drewett@cyfoethnaturiolcymru.gov.uk](mailto:David.Drewett@cyfoethnaturiolcymru.gov.uk)>  
**Subject:** Consideration of the winter starling roost near Llandegley Rocks / Llandegley Rhos as a potential SSSI

Dear Caroline

As you know the Llandegley Rhos area is currently the subject of a planning application for a wind farm development.  RWT has been concerned about this for some time and objected to the planning application because of the disturbance such a development might have on the very large winter starling roost.

There seems to be some debate about the exact size of the starling roost and no doubt it fluctuates from year to year.  My understanding from the ecological report that accompanied the initial planning application was that the roost was not particularly large and that the felling of plantation areas used by the birds would force them to move away from the development area and therefore reduce the chance of collisions and other disturbance occurring.

In ‘Birds of Radnorshire’ (Jennings, 2014), Pete refers to Radnorshire’s main starling roost having switched to Llandegley Rhos since 2003.  He reckons on average figures of between 135,000 and 180,000 birds.

Given the current threat posed to a roost of this size it made me look at the selection guidelines for biological SSSI (NCC, 1989) – I don’t have access to any more recent SSSI selection guidelines that NRW might be using.  For roosting birds it appears that winter roosts which constitute 1% or more of the UK population should be considered for SSSI designation.

Having spoken to experts locally and also the BTO HQ in Thetford it seems that the latest figure for the UK wintering starling population dates back over 50 years and was 37 million birds (Potts, 1967 cited in the ‘Atlas of Wintering Birds in Britain, 1986’).  Given the drastic declines in starling numbers across Europe since the 1960s I imagine the UK wintering population today is significantly lower?  However, even using the 1967 figure, the Llandegley roost may still make up around 0.5% of the UK wintering starling population.

I would welcome your thoughts on this and ask NRW to consider designating the Llandegley Rhos starling roost as a SSSI.

I look forward to hearing from you.

Best wishes

Julian

**Julian Jones**

**Director**

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**1**

**From:** Julian Jones - RWT   
**Sent:** 12 October 2017 11:45  
**To:** 'Caroline Moscrop ([caroline.moscrop@cyfoethnaturiolcymru.gov.uk](mailto:caroline.moscrop@cyfoethnaturiolcymru.gov.uk))' <[caroline.moscrop@cyfoethnaturiolcymru.gov.uk](mailto:caroline.moscrop@cyfoethnaturiolcymru.gov.uk)>  
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**Subject:** RE: Consideration of the winter starling roost near Llandegley Rocks / Llandegley Rhos as a potential SSSI

 Dear Caroline

I wonder if you or a colleague has had a chance to consider this request?

Several members of RWT / public, have contacted us to express their concern that now we have highlighted this issue the winter roosting areas may well be at peril from being felled – even though I appreciate any such large scale felling should be the subject of a felling licence(s).

Is it possible for a SSSI designation to be made as an emergency?  I realise this was done for the Ciliau SSSI to protect the lesser horseshoe bat maternity roost.

I look forward to hearing from you.

Best wishes

Julian

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**From:** Julian Jones - RWT [<mailto:julian@rwtwales.org>]   
**Sent:** 02 November 2017 15:56  
**To:** Moscrop, Caroline <[Caroline.Moscrop@cyfoethnaturiolcymru.gov.uk](mailto:Caroline.Moscrop@cyfoethnaturiolcymru.gov.uk)>  
**Cc:** Drewett, David <[David.Drewett@cyfoethnaturiolcymru.gov.uk](mailto:David.Drewett@cyfoethnaturiolcymru.gov.uk)>; Jones, Tim <[Tim.Jones@cyfoethnaturiolcymru.gov.uk](mailto:Tim.Jones@cyfoethnaturiolcymru.gov.uk)>; Powell, David <[David.Powell@cyfoethnaturiolcymru.gov.uk](mailto:David.Powell@cyfoethnaturiolcymru.gov.uk)>  
**Subject:** RE: Consideration of the winter starling roost near Llandegley Rocks / Llandegley Rhos as a potential SSSI

Dear Caroline

Sorry to send yet another email, but I am not sure what is a reasonable time to expect a reply, but now the starlings are starting to come back to Llandegley it is concerning me about the best course of action to protect this roost.

Have you or any of your colleagues had any thoughts at all?

Best wishes

Julian

**Julian Jones**

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**From:** Drewett, David [<mailto:David.Drewett@cyfoethnaturiolcymru.gov.uk>]   
**Sent:** 06 November 2017 11:10  
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**Cc:** Jones, Tim <[Tim.Jones@cyfoethnaturiolcymru.gov.uk](mailto:Tim.Jones@cyfoethnaturiolcymru.gov.uk)>; Powell, David <[David.Powell@cyfoethnaturiolcymru.gov.uk](mailto:David.Powell@cyfoethnaturiolcymru.gov.uk)>  
**Subject:** RE: Consideration of the winter starling roost near Llandegley Rocks / Llandegley Rhos as a potential SSSI

Julian

I have done some further research into this and the short answer appears to be that the Llandegley Rhos cannot be considered as an SSSI for its winter starling roost under current biological SSSI selection guidelines (1989). These state that sites should be considered if they “regularly contain 1% or more of the British wintering population of any species”. For starlings, the British wintering population in 1989 was estimated at 28 million birds, making the 1% threshold 280,000 birds. Unfortunately, there do not appear to be any very recent estimates for the total British wintering population of starlings? RSPB garden surveys indicate an 80% decline since 1979 but this data would not include large flocks originating from continental Europe. There is also the problem that roosting starling flocks disperse during the daytime, so a large area of Radnorshire might support the Llandegley starlings in a series of smaller flocks? However, the SSSI selection guidelines also have a criterion relation to **‘localities used by birds in particular conditions’**, which covers “localities which contain 1% or more of the total British wintering population regularly in definable conditions”. However it goes on to state that “it does not apply in cases where large numbers of birds occur in without attributable cause” and that “this guideline is unlikely to apply in many situations”.

I have been unable to identify any other SSSIs in Wales or England that have been selected partly on the basis of their large starling roosts, this includes Malltraeth Marsh (up to 350,000 birds) and Shapwick Heath/Ham Wall (Somerset levels – c6 million birds). I can only assume that NCC, JNCC, CCW  & NE Ornithological Specialists have always advised against notifying SSSIs on the grounds their starling roosts?

Dave

**From:** Julian Jones - RWT   
**Sent:** 06 November 2017 14:26  
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**Cc:** Jones, Tim <[Tim.Jones@cyfoethnaturiolcymru.gov.uk](mailto:Tim.Jones@cyfoethnaturiolcymru.gov.uk)>; Powell, David <[David.Powell@cyfoethnaturiolcymru.gov.uk](mailto:David.Powell@cyfoethnaturiolcymru.gov.uk)>  
**Subject:** RE: Consideration of the winter starling roost near Llandegley Rocks / Llandegley Rhos as a potential SSSI

Dear Dave

Thank you very much for that and it does seem strange that no starling roost ever appears to have been scheduled – perhaps there is a concern around designating bird roosts in general and it would be interesting to hear those views from those specialists.

I wonder if you could clarify the 1989 estimate of wintering starling in the UK being 28 million birds.  Do you know who made that estimate and where it appears in a publication, because the latest estimate I could find was the 1967 figure of 37 million birds which was again used by the BTO in their 1986 atlas?

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You are quite right to mention that the decline of resident UK starlings may not be the same across Europe where many of the Llandegley starling would come from, but data also suggests a similar marked decline in starling numbers across the EU over the last 30 years, so my point is that the 1% threshold of 280,000 may no longer be accurate – especially if based on data almost 30 years out of date?

The upper estimate of 165,000 birds at the Llandegley roost may now constitute a percentage that would qualify the roost as being considered for designation.

You are quite right to mention much larger roosts in other parts of England and Wales, but my understanding is that would not necessarily preclude a smaller roost from being designated SSSI and the levels of threat to a biological feature can be included as part of the SSSI designation criteria?

Best wishes

Julian

**Julian Jones**

**Director**

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**Subject:** RE: Consideration of the winter starling roost near Llandegley Rocks / Llandegley Rhos as a potential SSSI

Thanks Julian

There may well be a general policy of not designating starling roosts in the UK because they can move around and a number of alternative sites in a particular area may be suitable? Can Patrick confirm that this is the case? I can certainly forsee problems if the conservation agencies were minded to notify large starling roost SSSIs in urban and suburban areas!

The SSSI selection guidelines estimate of 28 million starlings wintering in Britain in 1989 can be found in table 27 but no source is quoted for this (winter) estimate. My search of the internet also revealed statements (from RSPB and others) that wintering starling numbers in northern Europe had declined significantly in recent decades, but no actual data to demonstrate by how much?

I don’t think that NRW could consider notifying starling roosts as SSSIs at present without further expert guidance (from JNCC?) and certainly not without accurate comparative data for the top roost sites in Wales.

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