

Klein, Debby

From: Simon Coles <simon.coles@onewindrenewables.com>
Sent: 22 August 2012 13:25
To: Klein, Debby; [REDACTED]@aol.com
Subject: Pentwyn Farm wind turbine ecology survey comments
Attachments: Pentwyn Farm Response Document.doc

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Debby,

Further to Harold's e-mail last week and his response to comments made by Miss Davies, please find attached a response to the ecological comments written by the ecologist Dr John Knight.

Regards,

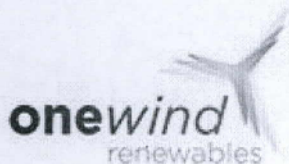
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Response to Comments raised by Miss Zoe K. Davies

This document has been prepared for Ms D. Klein of Hereford Planning Services in response to comments raised in a letter of 10 August 2012, by Miss Zoe K. Davies, of Newcastle upon Tyne, addressed to Ms Klein, in response to an application to establish a single wind turbine on land at Pentwyn Farm, nr Dorstone, Hereford.

This document has been written by Dr.s John and Tessa Knight. Dr J Knight BA (Hons) MA CEnv MIEEM is a Chartered Environmentalist, a full member of the Institute of Ecology and Environmental Management, a former Chairman of the Avon Bat Group, and holds Natural England bat, Great Crested Newt, and Dormice survey licences. For over 10 years he has taught a variety of ecology-based courses at the University of Bristol.

Dr Tessa Knight BSc (Hons) MSc MIEEM, is a full member of the Institute of Ecology and Environmental Management, and holds Natural England bat, Great Crested Newt, White-clawed Crayfish and Dormice survey licences. Dr T Knight's doctoral thesis (Knight 2006) examined the habitat and landscape use by the lesser horseshoe bat, contributing to the UK Biodiversity Action Plan (BAP) for the species (Section 5.5.2). Dr T Knight has lectured on bats at Bristol University and is a Research Associate within the Bat Laboratory at the University.

Over the past 17 years, both Dr.s J and T Knight have conducted countless Extended Phase 1 Habitat surveys, bat and Great Crested Newt assessments for a variety of proposed schemes. Both have worked on dozens of proposed wind farm schemes, ranging from single to multiple turbine sites.

Given the emotive nature of wind farms, it is recognised that members of the public often voice their concerns as to potential impacts on wildlife in strong and often inaccurate terms. In the case of the response by Miss Davies to the proposed turbine at Pentwyn Farm, we respectfully consider that the issues raised are not valid with regards the survey effort applied. We consider a number of the comments are especially inaccurate, demonstrating that the writer does not have a sufficient understanding of ecology. We set out below a response to the three main issues raised in the letter headlined under Section 7 titled *Incomplete and Non-Standard Map Presentation of the Extended Phase 1 Habitat Survey*: these being Great Crested Newts, the Extended Phase 1 Habitat Survey and associated mapping, and bats.

1) Great Crested Newts

We have held a number of successful development licences from Natural England for this species, and a recent Great Crested Newt Mitigation Scheme for a proposed multiple turbine site in Gloucestershire was praised by Natural England. Detailed survey for Great Crested Newts at Pentwyn Farm was not recommended as potential impacts from the proposed scheme were considered negligible. In addition, Miss Davies makes regular reference to the *Great Crested Newt Conservation Handbook* (2001), when in fact the Industry Standard is *Great crested newt mitigation guidelines* (2001, English Nature).

2) Extended Phase 1 Habitat Survey and mapping

Miss Davies states that, *It is impossible to complete the field survey element of an Extended Phase 1 Habitat Survey with due scientific and professional rigour on a single site visit*. This is a confusing statement for unless a site is of great size (i.e. a proposed pipeline scheme), then

an Extended Phase 1 Habitat Survey can be sufficiently completed in a day. Miss Davies stated that *I object to Dr. Knight making an assumption of habitat in one field, during the field element of the Survey, based on habitat he determined only in adjacent fields and not by his direct observation of the field in question.* As can be seen on the map provided with the report, the two off-site fields were marked as potential Improved, rather than actual Improved. This is a common practice where access cannot be gained and visual survey is from the field boundary. There is no perceived impact from the proposed scheme on either of these two off-site fields.

With regards the comment on possible TPOs, it is understood that there will be no tree loss. Miss Davies considers the map provided to be insufficient. We have successfully submitted similar maps on countless other planning applications for a wide variety of schemes and never has a planning officer or Natural England raised issue with the plans supplied. The colour scheme is correct, the key is correct, and the notation (i.e. I for improved) is also correct.

3) Bats

The Bat Conservation Trust (BCT, 2012) guidance referred to by Miss Davies, principally addresses large turbines and multiple turbine sites, whilst that proposed at Pentwyn Farm is for a small single 50kw turbine, measuring approximately 34m to the tip. The BCT guidelines clearly recognise the relatively lower risk of a single turbine compared to a multiple turbine site and the reduced survey effort compared to a multiple turbine site.

The proposed turbine at Pentwyn Farm is over 50m from the nearest hedgerow. Within their guidance on single large turbines, Natural England (Matthews *et al.* 2009), state *A bat survey should normally be recommended for applications for turbines that will be located within 50 m of the following features*, and this includes potential roosts, woodlands, hedgerows, rivers and lakes, and that *It may be possible to identify alternative lower risk locations for turbines at the scoping stage, in which case it may not be necessary to undertake surveys if the new locations fall outside the 50m avoidance zone.*

Concluding Remarks

We trust that the above satisfactorily addresses comments raised by Miss Davies. We draw attention to our experience of successfully undertaking numerous Extended Phase 1 Habitat surveys, bat and Great Crested Newt assessments for a variety of proposed schemes, including single and multiple turbine sites.