

# Mid Wales (Powys) Conjoined Wind Farms Public Inquiry

Application by RES UK & Ireland Limited dated 27  
March 2009 for consent under Section 36 of the  
Electricity Act 1989 to construct and operate a  
100MW wind turbine generating station in Powys, Mid  
Wales ('Llanbrynmair')

## Rebuttal of Evidence – Habitats

### **Appendices**

**Appendix A – letter from CCW to Powys CC.**



# Cyngor Cefn Gwlad Cymru Countryside Council for Wales

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Ein cyf/Our Ref: 1011961  
Eich cyf/ Your Ref: M2007 0972

23th May 2008

Dear Steve,

## **CONSTRUCTION OF 16 WIND TURBINES ON LAND AT MYNYDD WAUN FAWR TOWN & COUNTRY PLANNING ACT - DEVELOPMENT CONTROL**

Thank you for your consultation dated 11th October 2007, referring to the above proposal.

In discharging its functions under section 130 of the Environmental Protection Act 1990, The Countryside Council for Wales champions the environment and landscapes of Wales and its coastal waters as sources of natural and cultural riches, as a foundation for economic and social activity, and as a place for leisure and learning opportunities. We aim to make the environment a valued part of everyone's life in Wales.

**CCW objects to the proposal, because there is not enough information for us to assess possible effects. Subject to the provision of this information we may be able to review our position.**

In our opinion there is not enough information about the proposal to rule out adverse effects on the various interests for the following reasons:

- There is no consideration of the route of the over-head transmission line linking the site to the national grid.
- Further information is required on the impact of locating turbines and other infrastructure on blanket bog. This needs to include the results of the peat-depth mapping of the site.
- CCW disagrees with the conclusion in the ES that there will be no significant impacts on curlew. Additional information is required on the potential effects on ornithology including identification of necessary mitigation to avoid and minimise impacts. This includes a

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cumulative assessment with other wind-farms in SSA B that are built, consented or currently in the planning system.

- We consider that the ES lacks information in respect of European Protected Species:
  - a) There has been no bat survey of the application site and an assessment of the potential risks to bats.
  - b) Details are required of the area covered by the otter survey.
  - c) There needs to be an agreed method statement for any work on watercourses that may impact on the movement of otter. This particularly applies to the new bridge at Pantyrhendre.

Our concerns are detailed in the attached Annex A.

We also note that if further modifications to the road network are identified as part of the additional highways survey requested by Powys County Council then further information may be required about the impact on natural heritage.

We welcome the draft outline habitat management plan produced by the applicant in order to deliver environmental mitigation and enhancements. CCW request that any planning permission for the site should be granted with a condition that a detailed Habitat Management Plan should be agreed with CCW prior to the commencement of any construction activities.

CCW has held a number of constructive discussions with the developer and yourselves since November 2007 to resolve these matters. This response is a statement of the additional information that we have requested in this dialogue. Therefore to conclude, we can give further views when provided with the information requested above. In the meantime, **CCW objects to the proposal.**

We would welcome the opportunity to discuss this development proposal with yourselves and the developer. Should you have any queries or wish to clarify any of the above points, please do not hesitate to contact me.

Yours sincerely

**Dr Carol Fielding**  
Team Leader Montgomeryshire



## Annex A Detailed Comments

### 1. Landscape and Visual Assessment

#### 1.1 Assessment methodology and use of LANDMAP data

We note there is insufficient evidence to demonstrate that all five aspects of LANDMAP have been used, or any justification for why certain aspects have not been considered. Best practice for Wales is that detailed landscape character assessment should be based upon LANDMAP methodology, using all five aspects. The ES explains that the character areas for the landscape assessment are based solely upon the Visual and Sensory Aspect Areas.<sup>1</sup> Whilst it is agreed that the Visual and Sensory Aspect is relevant, all five aspect layers are important in determining landscape character areas. All five aspects for land where the turbines are to be erected within this application have been given an overall evaluation of 'high' by LANDMAP. The absence of any detailed evidence of a review of the other four aspects (habitats, cultural, historical, and geological) means that the ES may have failed to pick up other effects that could be significant.

We also note that the ES includes no assessment of the cumulative landscape impacts of this development with the proposed Tir Gwynt wind-farm.

#### 1.2 The landscape assessment

CCW acknowledge that the predicted landscape effects would largely occur within the SSA. We note that the development is situated some 12km from the boundary of the Snowdonia National Park. At this distance we agree there will not be a significant impact on this national designation.

CCW note that the effect on the landscape of the Esgair Cwmowen Uplands Visual and Sensory Aspect Area (VSAA 733 in LANDMAP) has been understated in the ES:

- The ES states that due to the proposed wind-farm only affecting a relatively small proportion of the Esgair Cwmowen Uplands, the effects would not constitute a significant impact on the overall landscape character of this area. The ES incorrectly states the area of the Esgair Cwm Owen Uplands Visual and Sensory aspect area as "8,2890 ha"<sup>2</sup>, rather than the actual area of 7,542 ha. The area of the proposed wind-farm, which is "479 ha"<sup>3</sup>, would therefore *directly* impact on some 6% of the Esgair Cwmowen Uplands area, with *indirect* effects over a larger area. The overall conclusion that none of the Esgair

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<sup>1</sup> ES Volume 1, 7.2.16

<sup>2</sup> ES Volume 1 7.8.6

<sup>3</sup> *ibid.*

Cwmowen Uplands would be “*likely to sustain significant landscape effects*” therefore understates the landscape effects.<sup>4</sup>

- The ES correctly states that the proposed wind-farm lies within Esgair Cwmowen Uplands Visual and Sensory aspect area and correctly assesses the sensitivity of this aspect area as ‘High’, but gives the magnitude of change as ‘Low’, resulting in an overall negative moderate effect, which is ‘Not Significant’.<sup>5</sup> In the methodology, the definition of ‘Low magnitude of change’ is given as “*a small-scale change affecting small areas of landscape character, including the loss of some extensive, characteristic landscape elements or the addition of new features or elements that are also small-scale in the context of a particular landscape character area*”.<sup>6</sup>

CCW question whether the introduction of 16 turbines into this area of landscape is in accordance with the above definition. Using the ES methodology, a more accurate assessment of the magnitude would be at least ‘Medium’, defined as being “*a change of more limited scale and extent including the loss of some key landscape characteristics or elements, or the addition of some new landscape features or elements that would lead to improvement or decline in landscape quality and indicate the potential for change in landscape character*”. A more accurate assessment of ‘medium’ impact at this ‘high’ sensitivity landscape receptor would result in a negative *moderate/substantial* effect that, according to the ES methodology, would be a *significant* landscape effect.

- The ES does acknowledge that Esgair Cwmowen Uplands has been evaluated as “high” for the Visual and Sensory aspect, but does not mention that “*maintain the general open aspect*” is listed as a key quality to be conserved.<sup>7</sup> CCW also consider that the ES wrongly asserts that the “*site lacks a distinctive sense of place*”<sup>8</sup>, given that the Esgair Cwmowen Uplands has been assessed as possessing a ‘strong sense of place’.<sup>9</sup>

Therefore CCW believes the wind-farm is likely to have a significant impact on the Esgair Cwmowen Uplands aspect area. However TAN 8 accepts that there will be landscape changes within and immediately adjacent to the SSA.

### 1.3 Visual Effects

CCW welcome the applicant’s use of wire-frame diagrams to support the illustration of the position of the proposed wind-farm, rather than relying solely on the use of photomontages. However we note that the photographs used do not allow for predicting the effects of wind turbines illuminated by strong sunlight and viewed against a darker blue-grey sky or land backdrop, so they do not illustrate worst-case scenario.

<sup>4</sup> ES Volume 1, 7.11.61

<sup>5</sup> ES Volume 1, Table 7.10

<sup>6</sup> ES Volume 1, Table 7.3

<sup>7</sup> Montgomeryshire LANDMAP (2004)

<sup>8</sup> ES Volume 1, 7.3.6

<sup>9</sup> Montgomeryshire LANDMAP (2004)

CCW note that the ES has identified significant visual effects from this proposed wind-farm on users of the Glyndwr's Way National Trail between Llanbrynmair and Llangadfan. There are also likely to be significant cumulative effects with other wind-farms on users of Glyndwr's Way. The cumulative effects from this route would be most evident along the open elevated sections in the locality - such as on Pen Coed Common to the north west - where views of both the Mynydd Waun Fawr and the Tir Gwynt schemes would be possible along with Mynydd Clogau beyond, in combination and succession. There is unlikely to be suitable mitigation to avoid or minimise these impacts on the National Trail.

## 1.4 Impacts On Other Landscape Features

CCW would wish to see any stone walls breached to create new tracks to be kept to a minimum. We would suggest that any displaced stone should be used to repair any damage to stone walls in the locality.

## 2.0 Transmission Line Connection

MIPPS 01/2005 states that an integrated approach should be adopted towards planning for renewable energy schemes and additional electricity grid network infrastructure. CCW are aware that policy guidance states that planning decisions for wind-farm applications and grid connections should ideally be determined concurrently; we also appreciate that that the electricity connection will be subject to a separate application.

The ES includes few details regarding the nature and routeing of the proposed connection to the national grid. Without the inclusion of the grid connection the ES cannot properly identify any mitigation requirements for landscape, ecology or ornithology because no detailed assessment can be made of the likely impacts of this important ancillary construction.

The ES lacks information as to whether the connection will be via a 33kv or 132kv line<sup>10</sup>. It is also not clear whether the grid connection between the substation and application boundary will be buried. The possibility of an overhead 132kv transmission line grid connection, rather than the typical 33kv, raises the level of potential visual effects to a degree. Such a line is likely to traverse slopes and may form skyline features and the routeing needs careful consideration if it is to be properly assimilated into the local landscape.

## 3 Ecology

TAN 8 provides an acceptance that there will be a significant landscape change within and immediately adjacent to the SSA. However this acceptance of change does not apply to other natural heritage features, and this proposal needs to be considered in terms of impacts on these interests.

<sup>10</sup> ES Volume 1, 6.9.1

TAN 8 and MIPPS clearly state that even within the SSA the presumption should be that environmental impacts are avoided or minimised:

- *‘With such extensive application sites there will very often be opportunities for developers to mitigate for any potential ecological damage and preferably enhance current wildlife habitats’*
- *‘There could be opportunities to enhance, extend or re-create habitats of wildlife and landscape interest. These opportunities should be grasped’.*
- *‘Renewable energy projects should generally be supported by local planning authorities provided environmental impacts are avoided or minimised’.*

Similar aspirations are included in the draft Powys IDCG.

We note that many of the habitats and species considered in the ES are included on the Powys LBAP and on the S42 list of species and habitats of principal importance for conservation of biological diversity in Wales. We remind you of your duty to have regard to the purpose of conserving biodiversity when exercising your authority’s functions (Section 40 Natural Environment and Rural Communities Act 2006).

### 3.1 Impacts on peat, blanket bog and other semi-natural vegetation

CCW has concerns about the loss of blanket bog habitat and disturbance of deep peat, although we welcome the attempt to locate infrastructure away from these areas. Blanket bog is a priority habitat on the UK and Powys Biodiversity Action Plans and is an Annex I priority habitat under the Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora). In addition to the direct loss of this habitat as a result of construction, the ES also needs to consider the fragmentation of the habitat as a result of the track network and changes in peat hydrology. Concerns regarding peat disturbance also arise from the loss of stored carbon and a loss of potential for blanket bog to act as a future carbon store.

Impacts on blanket bog need to be informed by peat-depth mapping of all areas potentially affected by site infrastructure. This information was initially requested by CCW in early 2006 in response to the EIA scoping. The peat-depth mapping should inform an alternative track lay-out and the micro-siting of turbines to avoid disturbance to blanket bog. The habitat map of the site should also be amended to reflect the results of the peat depth mapping. The effect of the construction footprint on direct habitat loss requires further consideration of:

1. The location of vehicle passing places and turning circles
2. The location and width of floating roads

3. The additional land-take as a result of the spread of over-burden along the edges of tracks, crane hard-standings and other infrastructure.

The ES recommends a 'floating road' construction where tracks need to be built over blanket bog. CCW requires additional evidence that this technique will not impact on peat hydrology resulting in blanket bog degradation. We need to be convinced that floating roads will not lead to peat compaction with the road sinking into the peat and resulting in discontinuities in the underlying peat hydrology. We note that the ES states the tracks will eventually sink into the peat so will not be removed during decommissioning<sup>11</sup>. CCW also requires evidence that drains along tracks or cable trenches placed in blanket bog habitat will not interfere with peat hydrology.

The suggested turbine lay-out has created conflict between safeguarding blanket bog habitat and the need to build new road to divert the existing bridleway route away from turbines. CCW have concerns over blanket bog loss resulting from the proposed new bridleway track near Llyn Newydd which is required to maintain a distance of 200m between the bridleway and turbine 15. CCW would wish to see the existing track used for construction traffic and further consideration given to the lay-out of the site to eliminate the need to construct a new bridleway track. We also require confirmation that all turbines will be at least 200m from any bridleway.

The ES needs to consider potential changes in land management as a consequence of improved road access within the site. Road access to upland areas often results in increased agricultural intensification and loss of semi-natural habitats. We would expect that this risk could be mitigated by a suitable habitat management plan.

### 3.2 European Protected Species - Bats

CCW consider that there is insufficient information presented in the ES to assess potential significant impacts on bats and that additional information needs to be collected.

The ES states that the windswept nature of the site offers poor foraging habitats for bats<sup>12</sup> although this is not supported by survey data. CCW are aware of increasing evidence that bats utilise upland areas. **Therefore we request that a bat survey is completed to inform the potential for significant impacts and mitigation before this application is determined.** CCW has recently agreed a detailed methodology for a bat survey with the developer and it is our understanding that this survey will be completed in 2008. Surveys should be completed in spring, summer and autumn, with one survey in each season and under favourable conditions, avoiding cold, wet and wind. The survey should concentrate on the areas around the lakes/pools, bog and

<sup>11</sup> ES, Volume 1, 9.8.18

<sup>12</sup> ES, Volume 1, 9.3.38

plantations to gauge the level of use of the site by bats. The survey should also further consider the use of adjacent buildings as roosts.

Any information collected by these surveys will need to be incorporated into appropriate mitigation to conserve the features used by bats; this will need to be agreed before planning permission can be granted. We would remind you of the relevant case law in respect of EPS (see *Regina vs Cornwall County Council ex parte Jill Harvey* September 2000).

### 3.3 European Protected Species - Otter Non-European Species - Badger

We note that the otter and badger surveys included land outwith the application area<sup>13</sup>. Additional information is required on the spatial extent of this survey to allow us to comment on the adequacy of this part of the assessment. CCW welcome the indication in the ES<sup>14</sup> that prior to construction the site will be resurveyed to check for signs of otter (including resting places) and badger, and that if any new sites are found a suitable mitigation strategy will be agreed with CCW.

Additional assessment is needed of the potential impacts on otters and badgers from construction activities and suitable mitigation identified, such as placing escape ramps within excavations. CCW note that the culvert at Pantyrhendre will be designed to minimise disruption to otter movement<sup>15</sup>. Additional information on this culvert design needs to be provided to and agreed with CCW. Before this application can be determined there also needs to be an agreed method statement for any work on watercourses which may impact on the movement of otter during or after construction.

We recommend that any planning permission includes a condition that all works are restricted to more than 30m from a badger sett. Detailed working instructions will need to be included in the Environmental Management Scheme. Part of the track layout appears to be located within a distance likely to result in disturbance to a badger sett and a licence may be required before any work commences. Further information needs to be supplied on the exact location of this sett.

### 3.4 European Protected Species - Great Crested Newts

Since the public release of this ES, CCW has raised concerns with the developer that no survey for great crested newts has been completed at the site. The justification in the ES for this omission are that two of the water bodies on site are stocked with fish and that the other two water bodies (Llyn Newydd and Llyn y Bugeil) are suitable for fish stocking. Additional ponds

<sup>13</sup> ES Volume 1, 9.2.18

<sup>14</sup> ES Volume 1, Table 9.6

<sup>15</sup> ES Volume 1, Table 9.6

impacted by road improvements at Neuadd Bridge (SJ0808) on the access route to the site have also not been surveyed for great crested newts<sup>16</sup>.

The developer has now provided further information to CCW on the potential for the water bodies impacted by this development to support great crested newts. CCW are now satisfied that there is no need for any survey for great crested newt and advise that this information is presented in an addendum to the ES for the public record.

### 3.5 Other interests

- 3.5.1 Reptiles: There is potential for site enhancement for reptiles as part of the habitat management scheme, and certainly the habitats on the site should be safeguarded from further agricultural improvement over the life of the wind-farm. We note the measures in Table 9.6 to ensure compliance with wildlife legislation. CCW recommend that any stone walls or other potential resting places composed of loose stone that have to be moved should be moved by hand and placed at a safe distance from construction activities so that they can offer refugia for reptiles in the vicinity. Any cut scrub could also be used in a similar manner.
- 3.5.2 Brown hare: No survey was completed for this Powys LBAP and S42 species. CCW consider that no additional information needs to be collected and the Habitat Management Plan should offer enhancements for the local impact on this species.
- 3.5.3 Hedgerows: CCW would prefer to see any hedgerows to be removed as part of Public Highway improvements (Para 9.3.30) to be translocated to form the new boundary (CCW welcome this stated intention in Table 9.7). If new planting is required this should be composed of species of local provenance

## 4. Ornithology

4.1 A lack of information in the ornithological assessment means potential impacts on birds are uncertain. Our concerns are:

- Areas of the development site and the necessary buffer zone have not been surveyed for birds as the surveyor had restricted visibility from the vantage points. A map is also needed to confirm the area covered by the Brown and Shepherd breeding bird survey. A minimum 500m buffer zone should have been surveyed for waders.
- Vantage points were located within the proposed wind-farm site. This may have led to disturbance and under recording of birds. It needs to be demonstrated to CCW that there were no alternatives outside the site.
- Vantage point watches were not always completed for the time span suggested by best practice guidance:

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<sup>16</sup> ES, Volume 3, Figure 5.7

- No watches were completed in August, December, January and April when guidance suggests that surveys for raptors should encompass a complete year.
  - No breeding bird surveys for waders occurred in March and April so curlew nests that failed early in the season may have been missed.
  - No targeted surveys were undertaken for snipe or barn owl. The assessment takes no account of this.
  - No breeding wader records were collected during the vantage points surveys although the Brown and Shepherd survey had shown them to be present. There is therefore no information about wader flight activity within the site.
  - No evaluation of 'species for the principal conservation of biodiversity' in Wales (Section 42 species)
- 4.2 The ES lacks consideration of potential impacts on ornithology arising from:
- :
- cumulative ornithological impacts from wind-farms in the SSA which are built, consented and in the planning system This needs to include the cumulative impact with the Tir Gwynt wind-farm and the impact from displacement of birds, in particular curlew
  - increased disturbance to birds as a result of operational maintenance of the wind-farm, changes in land management and increased public access for recreation or as a result of the wind-farm becoming a visitor attraction
  - increased predation pressure, for instance as a result of infrastructure providing perching opportunities
- 4.3 The breeding bird survey recorded five pairs of curlews using the site and these are evaluated as being of regional value. As stated in the ES, the curlew population in Wales is currently estimated to be 1,099 pairs, representing a decline of 81% since the last estimate in 1993. Curlew has recently been recognised as a species of 'principle importance for the conservation for biodiversity in Wales' (section 42 species). We also note that the site is located within one of the 'Key Areas' identified for curlews in Wales by the RSPB. This wind-farm cumulatively with the neighbouring proposed wind-farms supports a curlew population of national (Wales) value.

Breeding waders are sensitive to disturbance from the construction and operation of wind-farms although there are few robust scientific studies on this subject. **CCW disagrees with the conclusion in the ES that there will be no significant impacts on waders** and we require further consideration of the following issues:

- CCW recommends a stand-off distance of 600m around curlew and snipe nest locations during the construction and operational period as opposed to the 250m suggested in the ES. The ES accepts, even with the implementation of stand-off distances, there will be



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temporary displacement of waders during the construction period but does not consider this to be significant. Given the declines of the curlew population in Wales CCW believes even temporary displacement (1-2 years) could have a significant impact and the applicants need to consider suitable mitigation. This could be achieved by ceasing construction activities on the site during the wader breeding season.

- The risk of longer-term displacement of waders from the site needs to be further considered by the applicants. A number of the turbines are within the mapped curlew territories (figure 10.3). Turbine 10 is located within the centre of one curlew territory and 200m of another; turbine 1 is within 300m of another territory and turbine 11 is 400m from another. ES acknowledges that curlew will be lost from the site but does not consider this loss would be significant or could be mitigated against. CCW believes this loss would be a significant impact and that suitable mitigation should be considered, for example by moving or deleting certain turbines.

4.4 Further information is required about the use of the area by hen harrier. Roosts were identified on the site near to turbine 11 but there was no recording of the flights lines of these birds.

## 5.0 Biological Monitoring

5.1 We welcome the intention of the applicant to undertake a monitoring programme to investigate the interaction of waders with the wind-farm and to assess the success of the proposed mitigation measures. The scope may need to be extended to include other ornithological issues, bats, habitats and peat hydrology depending on any final planning permission. Should your authority approve this planning applications we would wish to see a condition that the construction of the wind-farm shall not commence until the applicant has agreed a programme of monitoring with CCW, with clearly stated objectives of the desired outcomes.



## **Appendix B.**

### **Method statement for hedgerow removal and replacements.**

Where possible hedgerows will be translocated. Sections where this is considered possible have been identified in the CSEI, Appendix 5.3. .

Where hedgerow removal and replacement is required existing hedgerows are down to approximately 30 -50cm from ground level during November to the end of February. Clearance of the stumps can then be undertaken from mid to late May

Hedgerow vegetation will be removed using hand tools/machinery. Cut vegetation will be moved away from the hedge and left overnight and some of the brash will be retained on site to be used as dead hedging.

Once the work is done, any gaps in the translocated hedgerow or the new hedge line will be planted with local provenance hedge plants to include a range of species to reflect the removed hedge but also where possible to include hazel and species that can provide food quickly. A hazel may be 5 years or more before fruiting, so species such as bramble, dog rose, hawthorn, which can grow quickly and provide early-season food for all wildlife, and a range of spp for later in the year including blackthorn, elder and crab apple will be included in the species mix. Dead-hedge material will be included amongst the new whips to help provide quick and continuous cover so that there is a corridor connecting the hedge sections. This dead material can be any branches which have been cut recently from nearby, and placed horizontally along the hedge line, woven around interspersed 1m-long 'pegs' of branches to keep this material upright.

Where possible hedgerow management will be undertaken under a long term management agreement to maintain hedge structure and limiting flailing to ensure maximum food availability for wildlife.



### Appendix C - Comments on Appendix DW8

It was intended to include in the submission updated details of all surveys and assessments that have been carried out. I concede that this was omitted by error. All appropriate surveys and assessments have been carried out and details are given below in response to Mr Woodfield's Appendix DW8. The term 'no ecological issues' was intended to convey an overview during the multi-disciplinary assessment carried out in 2013.

Site	Appendix DW8 remarks	Comments
<p>Ch 460-590</p> <p>001 rev G</p> <p>Over-run and parapet works</p> <p><b>Glen Menial Bridge</b></p>	<p>70m hedgerow removed.</p> <p>Recently stated by RES (in September 2013 correspondence to NRW) that hedgerows have now been assessed for dormouse (in Spring 2013) yet no mention of this in August 2013 SEI</p>	<p>It is acknowledged that 70m hedgerow will be removed and <u>replanted</u> with a mix of species to match existing. In addition the soil from the existing hedge base will be used to form a small mound to plant into, to maintain existing ground flora. The current hedge is trimmed (c.1.5m high) and is isolated from other hedges by a barrier of stream and stone wall to north. A farm breaks the hedge to the south.</p> <p>Hedgerows were assessed in 2011 and 2013 and this was clarified in correspondence to NRW. It is acknowledged that this was not clearly stated in the 2013 submission.</p> <p>Vegetation description pasted by DW from the 2011 submission refers to a different section on the opposite side of road - vegetation there now partly removed.</p>

<b>Site</b>	<b>Appendix DW8 remarks</b>	<b>Comments</b>
<p>Ch875-950 002 rev G Dioisig bridge and over run area</p>	<p>50m hedgerow removed</p> <p>Recently stated by RES (in September 2013 correspondence to NRW) that hedgerows have now been assessed for dormouse (in Spring 2013) yet no mention of this in August 2013 SEI.</p> <p>No consideration of otters in Nant Dioisig or using bridge.</p> <p>Bridge has bat roosting potential</p>	<p>50 m hedgerow removal agreed, to be replanted</p> <p>Hedgerows were assessed in 2011 and 2013 and this was clarified in correspondence to NRW. It is acknowledged that this was not clearly stated in the 2013 submission.</p> <p>The site has been surveyed for otters and no signs found – see note at end of table.</p> <p>Bat data has been submitted separately.</p>
<p>Ch 970-1175 (3 separate locations) 002 rev G</p>	<p>Verge works appear unable to be completed without more impact on hedgerows/trees than assessed.</p> <p>Hedges look good for dormouse, but have not been assessed or surveyed.</p> <p>No mention of tree loss on AECOM drawing – despite August 2013 SEI suggesting it may need to be felled. Position therefore unclear.</p> <p>No assessment for bats</p>	<p>AECOM assurance that verge work is possible as assessed.</p> <p>Hedgerows were assessed in 2011 and 2013 and this was clarified in correspondence to NRW. It is acknowledged that this was not clearly stated in the 2013 submission.</p> <p>Not clear which tree loss is being referred to – one tree in this area recently felled, presumably by landowner.</p> <p>Bat data has been submitted separately.</p>

<b>Site</b>	<b>Appendix DW8 remarks</b>	<b>Comments</b>
<p>Ch1950-2000</p> <p>004 rev G</p>	<p>Scant information on botanical composition of affected ditch and verge.</p> <p>No mention of potential hedge loss cited in AECOM drawings in ecology material.</p> <p>Potential for unquantified additional hedge loss to that assessed. On-site assessment suggests no room to accommodate 0.5m overrun without significant impact on hedges.</p> <p>Mature tree at Ch1950 appears unlikely to be able to be retained.</p> <p>Not surveyed for dormouse.</p>	<p>Ditch species-poor, and verges semi-improved or improved grassland as per previous assessment.</p> <p>Not clear what is meant – hedge loss appears to be noted.</p> <p>Disagree – consider that any loss likely has been assessed.</p> <p>Disagree – consider that tree can be retained.</p> <p>Has been assessed for dormouse, but acknowledge this was omitted from 2013 submission.</p>
<p>Ch2400-2575</p> <p>004 rev G</p>	<p>Unquantified possible additional hedgerow loss. On-site check suggests it will be unavoidable.</p> <p>“Not considered suitable for dormouse” (Sept 2013). Grounds not given.</p> <p>No Bat survey</p>	<p>Disagree that it will be unavoidable but commitment to replant has been given. “If hedge loss unavoidable new hedge replanted to match existing.</p> <p>Section of hedge most likely to be affected is partly non-native garden hedge, and an extra hedge has been removed on east side, presumably by landowner.</p> <p>Bat survey data has been submitted separately.</p>

Site	Appendix DW8 remarks	Comments
Ch2970-3050 005 rev G	<p>No update re badgers, so impacts uncertain.</p> <p>Dormouse survey was in 2010 and based on nut search alone. No nuts found. Spatial extent of survey coverage not clear.</p> <p>Unclear why not assessed/ surveyed for dormice again in 2013, given high habitat potential for the species</p>	<p>Still no sign of recent badger activity. Sett still old and unused. Badger survey will be repeated immediately prior to any works, as stated. Concede that this information was omitted.</p> <p>Survey covered all hazel habitat found in this section.</p> <p>It was considered that the 2010 data was still sufficient – the habitat was re-assessed and had not changed.</p>
Ch3340-3450 006 rev G	<p>No update re badgers, so impacts uncertain</p> <p>Dormouse survey was in 2010 and 148 nuts found (none showing dormouse evidence)</p> <p>Extent of survey coverage not clear.</p>	<p>Still no sign of recent badger activity. Sett still old and unused. Badger survey will be repeated immediately prior to any works, as stated. Concede that this information was omitted.</p> <p>This is correct</p> <p>Survey covered all hazel habitat found in this section.</p>
Ch3870-3930 006 rev G	<p>52m of existing hedgerow loss not accounted for in eco assessment.</p> <p>This area has not been surveyed for dormice.</p> <p>No update re badgers, so impacts uncertain.</p>	<p>The section was accounted for and is included in the overall hedgerow loss.</p> <p>Hedge here mixed Hazel, Hawthorn, Blackthorn, Sycamore etc. It was assessed for dormice but omitted from 2013 submission.</p> <p>Badger survey repeated and no fresh signs found.</p>

Site	Appendix DW8 remarks	Comments
Ch3875-4090 006 rev G Access to "Caerbwla"	No bat survey Dormouse survey was in 2010 and no nuts found, although extent of survey coverage not clear. No 2013 survey.  No badger survey done as per 2011 recommendation.	Bat survey data has been submitted.  Dormouse survey covered all suitable habitat in this section.  Badger survey was undertaken – no recent badger activity in this section.
Ch3950-4200 007 rev G.	Dormouse survey was in 2010 and no nuts found, although extent of survey coverage not clear. No 2013 survey, despite high potential habitat here.	Dormouse survey covered all suitable habitat in this section.
Ch4235-4315 007 rev G	No hazel nuts found due to flailing – issues with survey technique. Unclear when surveyed. Hedges do become less suitable for dormouse towards Gosen.	Surveyed in 2010.

Site	Appendix DW8 remarks	Comments
<p>Ch4335-4600 007 rev G and 008-001 rev G to 008-003 rev G Gosen Bridge</p>	<p>No baseline data provided on construction landtake areas, including temporary compounds and haul routes shown on AECOM drawings</p> <p>Sections of hedge loss adjacent to the bridge not quantified</p> <p>Construction compound not surveyed, nor route from const compound to Gosen Bridge.</p> <p>Significant tree felling and/or disturbance/root damage through inclusion in bridge construction compound or “verge” works.</p> <p>c75m hedge loss adjoining bridge not accounted for as well as numerous trees/shrubs.</p> <p>Dormouse surveys of Ch4335-4430 no nuts found considered unsuitable due to open hedge and flailing.</p> <p>Extent of otter survey not clear – e.g. does not cover interface between const compound and river.</p>	<p>Construction landtake areas surveyed and are on improved grassland.</p> <p>Not clear where this refers to.</p> <p>As above – were surveyed and are of improved grassland.</p> <p>AECOM drawings state that none of the mature trees adjacent to the existing property will be felled. Tree loss on the bank is acknowledged and replanting will be undertaken,</p> <p>Unclear how 75m figure reached.</p> <p>This is correct.</p> <p>Otter survey covered area from minor road bridge to confluence on both sides of the river, and upstream to 100 m above bridge. A short section (approximately 20m) immediately upstream of the bridge was not accessible due to fallen tree and river bed conditions, but was surveyed from above with binoculars. No signs of otter found.</p>

Site	Appendix DW8 remarks	Comments
Ch4540-4560	Loss of (acid grassland) verge (with devil'd-bit scabious) and some hedgerow indicated in contrast to "no ecological issues" statement.	This section is considered to be a small section of semi-improved grassland. There is minor impact on hedge.
Ch4550-4640	Unquantified loss of hedgerow type vegetation and small trees. Acid grassland in verge not identified or detailed.	Verge is semi-improved grassland, not species rich (Cocksfoot, Yorkshire Fog, Creeping Buttercup, small patch of Devil's-bit Scabious, etc.). Loss of three small trees is acknowledged.
Ch5130 – 5180 009 rev G Sychtyn Farm	Works will involve regrading, thereby expanding area of impact. No botanical data on wall and unquantified hedgerow loss.	Not clear why it is considered that regrading will expand area of impact. Adjacent land is farm access and the wall is at edge of driveway. Garden species, plus species-poor grassy flora of Yorkshire Fog, Common Sorrel, Sheep's Sorrel etc. 'Hedgerow' is Sycamore, Bracken, garden shrubs etc. Replacement hedge to be agreed post planning.
Ch5175-5315 009 rev G	<p>Surveyed for dormouse in 2010 (coverage unclear) with no nuts found. "It is currently very open and not connected to other habitat and not suitable for dormouse"</p> <p>No botanical info on field or verge, yet betony and devil's-bit scabious observed, contrasting with 2011 assessment.</p>	<p>Coverage was of all the possible habitat in this section.</p> <p>Field is agriculturally improved, being reseeded and species-poor. Verge semi-improved as in 2011 report. Common species were Cocksfoot, Yorkshire Fog, Nettle, Common Sorrel and Cow Parsley.</p>
Ch5330-5430 010 rev G	"Not considered suitable for dormouse as not a large enough section of hedge and no nuts present"	No nuts were present in this section.

Site	Appendix DW8 remarks	Comments
Ch5430-5700 010 rev G	No info on species composition of hedges or verges, yet indicator species noted on site.	Hawthorn, Gorse. Semi-improved grassland on verge. Common species included Cocksfoot, Creeping Buttercup, and Common Knapweed, with a little Devil's-bit Scabious.
Ch5770-5880 010 rev G	Uncertainty and lack of baseline information on verge and hedgerow affected.	Pruning of area dominated by Grey Willow. Poor semi-improved grassland verge.
Ch6060-6115 010 rev G	Uncertainty and lack of baseline information on verge and hedgerow affected.	Mainly Grey Willow, also Ash, Hazel. Poor semi-improved grass verge.
Ch6090-6325 010 rev G <b>Hafod Farm</b>	8 trees to be lost, as shown on AECOM drawing, of which only five speciated and assessed in ecology material.  Uncertainty over extent of hedgerow loss and area of works. Tree loss not fully assessed.	The 8 young trees are of Sycamore, Beech and non-native species. "To be replaced with 15 root-balled heavy standards".  This section is of open wire fence.
Ch5660-6580 011 rev G	75m hedgerow lost apparently not assessed for dormice despite habitat structure and connectivity looking good. No species data on hedge or verge (verge has harebell etc).	Presume this is Ch 6560 – 6580. The next three sections were difficult to line up comments with habitat found on a site visit. Semi-improved or poor semi-improved verge, with low hedge dominated by Hazel.
Ch6530-6770 011 rev G	c.25m hedgerow lost apparently not assessed for dormice despite habitat structure and connectivity looking good. No species data on hedge.	Semi-improved or poor semi-improved verge, with low hedge dominated by Hazel.
Ch6730-6950 011 rev G	c.220m hedgerow impacted and/or lost apparently not assessed for dormice despite habitat structure and connectivity looking Ok or good. No species data on hedge or verge (	Semi-improved or poor semi-improved verge, with low hedge dominated by Hazel.

<b>Site</b>	<b>Appendix DW8 remarks</b>	<b>Comments</b>
Ch6950-7130 011 rev G	Apparently not assessed for dormice in 2010. 2013 "existing hedge is open and not suitable for dormouse" Do not agree on basis of site visit. No data to assess impacts on adjacent field and in watercourse affected by culvert crossing (could result on loss of small trees adjacent).	No hedgerow loss expected in 2010  Hedge is mixture of abundant Bracken, with Hazel and Bramble.  Adjacent field is improved. Watercourse species-poor with a patch of Meadowsweet and a half-metre high willow adjacent. Trees will not be lost by culvert works.
Ch7150-7290 011- rev G Approach to Dolwen Isaf bridge	Unquantified impact on adjoining conifer plantation and fringing broadleaved vegetation from c. 40m x 100m landtake. Impacts on scattered vegetation and/or conifer plantation edge extend to c.100-150m minimum No species data for river/riverbank, and effect on riverbank unquantified. Significant tree loss (perhaps 50) not clear from SEI material.	The works will require felling of part of the conifer plantation. This is currently a dense stand with no ground vegetation and impacts not considered significant. Scattered vegetation at front of conifers of hazel, ash, willow and grey alder. Since original survey have been considerably trimmed back.  The impact on the riverbank is minimal as most of the works are within the existing structure.

Site	Appendix DW8 remarks	Comments
<p>7400-7550 012 rev G Dolwen Isaf Bridge</p>	<p>Mature Ash tree with potential for bat roost.</p> <p>No mention of otter survey and need for it to be repeated. Otter survey “immediately up and down stream” does not indicate whether river frontage affected by construction was covered or whether extended to Dowlen uchaf, or affected drainage channel. Otter spraint found on DW site visit.</p> <p>Significant earthworks due to levels will be required close to statutory SSSI.</p> <p>Bridge not assessed for bats</p>	<p>Bat survey has been submitted.</p> <p>Otter survey undertaken from SH979074 upstream to SH976307 along Afon Gam, and from confluence to SH975074 upstream towards Dolwen farm including minor watercourse and drainage channel. No otter signs found in 2011 or 2013.</p> <p>Otters were recorded within the windfarm site during surveys and almost certainly pass along all rivers in this area. No holt or lying-up sites found so no possibility for disturbance. Bridge works not considered to impact on otters passing along river.</p> <p>The nearest section of Gweunydd Dolwen SSSI is 40 metres from proposed Dolwen Uchaf works and across the river. It is 140 metres from proposed Dolwen Isaf works. It is not considered that there will be any impacts on the features of this site.</p> <p>Bat survey has been submitted.</p>

Site	Appendix DW8 remarks	Comments
<p>7500-7670 013 rev G Dolwen Uchaf (Tributary) bridge</p>	<p>Unclear whether otter survey included this bridge (DW found spraint on site visit)</p> <p>Bridge not assessed for bats</p> <p>Risk to SSSI from new channel construction and significant earthworks?</p>	<p>As above Otter survey undertaken from SH979074 upstream to SH976307 along Afon Gam, and from confluence to SH975074 upstream towards Dolwen farm including minor watercourse and drainage channel. No otter signs found in 2011 or 2013.</p> <p>Bat survey has been submitted.</p> <p>The nearest section of Gweunydd Dolwen SSSI is 40 metres from proposed works and across the river. It is not considered that there will be any impacts on the features of this site. No objection re. SSSI from statutory agency (NRW).</p>
<p>7950-8040 013 rev G</p>	<p>No construction area shown on plans and appears likely that it will be outside redline</p> <p>Verge has devil's-bit scabious, tormentil etc</p>	<p>Adjacent field is improved pasture.</p> <p>Verge is considered to be improved and semi-improved – Nettle and Creeping Thistle abundant. Fields improved.</p>
<p>8150-8240 014 rev G Overrun on approach to Site Access 1</p>	<p>C10m hedgerow plus tree loss (sallows). Trees too small for bats.</p> <p>Assessment of verge locally of conservation interest not referenced in later assessments</p>	<p>Unsure as to which hedge referred to here – this does not appear to refer to this section.</p> <p>2011 assessment said that verge was of little conservation interest, not of local interest. Use of grass reinforcement will mean retention of most species so impact is considered minor.</p>

Site	Appendix DW8 remarks	Comments
8250 014 rev G Site Access 1	2no small tree/bush to be lost adjacent to one culvert. Uncertainty in absence of habitat and protected species data. Earlier assessments not included in 2013 SEI.  Culverts not assessed for bats or otter.  Watercourse significantly below road level – culvert-strengthening works may result in significant landtake.	Unclear as to which culvert referred to.  Fields are improved, with Soft Rush. “Earlier assessments” quoted refer to later section.  Culverts assessed for otter in 2013 and no sign found.  Disagree that significant landtake will be needed.
8280-8320 015 rev G	Uncertainty in absence of habitat and protected species data. Earlier assessments not included in 2013 SEI.	The previous assessment states it is of little conservation interest. As proposals are for reinforced grass most species will be maintained and impact considered minor. For this section and the following section there appears to be some confusion of sites in the DW8 appendix.
8330-8580 015 rev G	Uncertainty in absence of habitat and protected species data. Earlier assessments not included in 2013 SEI.	The previous assessment states it is of little conservation interest. As proposals are for reinforced grass most species will be maintained and impact considered minor.
8500-8850 015 rev G	No supporting data to check veracity of 2011 2013 statements	The verge here is improved or poor semi-improved verge; common species included Perennial Rye-grass, Soft Rush. It is not considered the proposed works will have any significant impact.

Site	Appendix DW8 remarks	Comments
<p>8850-9680 016 rev G 0045 rev G 017 rev G Neinthron Bypass</p>	<p>Unquantified losses of U4 grassland habitat at first stream crossing, plus scrub as mentioned. No data on quality of grasslands or habitat data for affected river and shingle island.</p> <p>Additional survey recommendations not followed through</p> <p>No habitat data for improved pastures?</p> <p>Gross underestimation of habitat value of "marshy grassland" at southern end and misclassification (it is mire) Omission of earlier statements indicating conservation interest in later SEI.</p>	<p>Stream crossing dominated by semi-improved grassland and gorse. The bridge structure, and therefore exact footprint is to be detailed post planning.</p> <p>Shingle island not affected by current proposals.</p> <p>Not clear what "survey recommendations not followed through" refers to. Unclear as to what habitat data requested.</p> <p>This currently conforms most closely to U6 <i>Juncus squarrosus</i> – <i>Festuca ovina</i> grassland. It has probably derived from M17 <i>Trichophorum cespitosum</i> – <i>Eriophorum vaginatum</i> blanket mire, but the original constituents of the vegetation are now at most occasional within the sward. These include rare occurrence of <i>Sphagnum papillosum</i>, occasional <i>Sphagnum fallax</i> and rare occurrence of cranberry <i>Vaccinium oxycoccus</i>. All other species are typical of U6. These include frequent heath rush <i>Juncus squarrosus</i>, frequent <i>Aulacomnium palustre</i>, frequent <i>Polytrichum commune</i> and frequent bilberry <i>Vaccinium myrtillus</i>. Purple moor-grass <i>Molinia caerulea</i> is also frequent here. The route of the proposed new track here crosses the edge of this U6 grassland area, before crossing two small ditches. These ditches support M6d (<i>Carex echinata</i> – <i>Sphagnum fallax/denticulatum</i> mire; <i>Juncus acutiflorus</i> sub-community), dominated by sharp-flowered rush and <i>Sphagnum fallax</i>. This whole area has been subject to heavy grazing over many years, as characterised by the presence of frequent heath rush.</p>

Site	Appendix DW8 remarks	Comments
<p>8850-9680 016 rev G 0045 rev G 017 rev G Neinthron Bypass Continued</p>	<p>Estimated 850 m3 of peat loss (assuming 10m wide construction corridor through peat area) but additional losses possible elsewhere e.g. peat depth at point where re-joins road not quantified despite confirmed presence here. Peat can also survive below imp grassland.</p> <p>Involves 5no watercourse crossings, loss of scrub, peat impacts and loss of high quality mire habitat</p>	<p>“Earlier statements” quoted refer to Section 11b which is a section of road improvement no longer being undertaken within mire habitat. Current proposals are grass reinforcement within existing verges. Bypass is Section 11a on the earlier assessment and at that time “exact location of bypass to be confirmed”</p> <p>636 cubic metres is calculated from the detailed surveys undertaken. The area where the bypass re-joins the road is on less than 10cm of soil, most of which cannot be characterised as peat.</p> <p>Agree there is some loss of scrub, mitigated by replanting and peat impacts as calculated above.</p> <p>Do not agree that it is ‘high quality mire’.</p>
<p>9550-9680 045 rev G 017 rev G</p>	<p>Peat depth (and loss) at point where re-joins road not quantified. Significant contrast between 2013 SEI and earlier statements likely to mislead reader</p>	<p>The area where the bypass re-joins the road is on less than 10cm of soil, most of which cannot be characterised as peat.</p> <p>Changes to assessment are due to changes in methods proposed and changes in section numbering.</p>

Site	Appendix DW8 remarks	Comments
9680-9840 017 rev G	<p>One small rowan tree lost which has cavities with bat roosting potential. No bat survey carried out or expected in pending SEI</p> <p>Adjoining marshy grassland is locally on peat. Extent of ground re-profiling required near existing access road unclear.</p>	<p>Bat survey now submitted.</p> <p>Works within existing verge which is not on peat.</p>
9770-9980 017 rev G 018 rev G	<p>Adjoining marshy grassland is locally on thin layer of peat. Possible additional minor peat impact.</p> <p>No habitat data</p>	<p>No additional peat impact on this section – as above, the works are within an existing verge which is not on peat.</p> <p>Species poor grassland dominated by Soft Rush.</p>
9770-9980 018 rev G	<p>Upslope vegetation to north includes gorse area, and one small crab apple with acid grassland on bank, also areas of impeded drainage. No mention of vegetation loss in 2013 SEI or dwgs</p>	<p>Could not locate the vegetation referred to in this section. Considered there is confusion in Appendix DW8 in interpretation of numbering system.</p>
10140 018 rev G 043 rev F Site access 2	<p>Peat loss on inside of corner not quantified and mire not detailed.</p> <p>U4/acid grassland on banks not identified (harebell, heather, Molinia etc etc). Significant re-profiling works have potential to extend impacts</p>	<p>Not clear where inside corner, or mire is, that are referred to.</p> <p>The area affected is species-poor marshy grassland, and improved or species-poor semi-improved grassland. The area considered to be of acid grassland appears to be on the banks that are heavily grazed. Agree that re-profiling works will have impacts but that restored ground will have equal value to current situation.</p>

Site	Appendix DW8 remarks	Comments
10100-10440 018 rev G	Upslope acid grassland impacts. Unclear whether any peat loss will occur as downslope works (re-profiling, embankments and drainage) would appear to extend into adjoining mire. 2011 recommendation to avoid ditch not achieved. No data on aquatic veg mentioned in 2011.	Area covered is species-poor, semi-improved acid grassland.  The works are within the existing drier verge along this section.  Ditch referred to in 2011 is not one of the ditches considered to be affected by the current proposals.
10410-10530 018 rev G & 019 rev G	Potential siltation impacts to adjoining river (within 2m in this section).  Potential impacts on adjoining (upslope) marshy grassland (M23 type).	Plans indicate river 5 – 6 metres away. Siltation issues will be address within detailed construction method statements.  Marshy grassland not affected.
10530-10610 and 10620-10730 019 rev G	Road widening extends to north and affects existing drainage channels and associated marshy grassland.  Requires reconstruction of land drains with possible impacts on adjacent marshy grassland and aquatic vegetation	Ditch is regularly cleared and contained little vegetation, and grassland affected is heavily grazed, both were species poor. Minor impact here not considered significant. Little aquatic vegetation within drains that are regularly cleared. New land drains to be created will have no more impact than current ones.
10675-10950 019 rev G	Unquantified additional impacts from construction working areas not assessed. These may be outside redline. Mature willow tree lost at culvert	Open land within redline to east is improved, or poor semi-improved, grassland. Minor short term impacts possible from construction area. The willow was not considered to be lost during site visit with engineers.

<b>Site</b>	<b>Appendix DW8 remarks</b>	<b>Comments</b>
10920-11120 019 rev G	Unquantified additional impacts from construction working areas not assessed. These may be outside redline.	Open land within redline to south and east is improved or poor semi-improved grassland. Minor short term impacts possible from construction area.
11100-11380 019 rev G	Unquantified additional impacts from construction working areas not assessed. These may be outside redline.	Surrounding land is improved pasture.
11380 – 11430 020 rev G	Unquantified additional impacts from construction working areas not assessed. These may be outside redline.	Offline working involves working on the verge to be impacted, within the red line boundary, with no further impacts.
11430 - 11640 020 rev G	Unquantified additional impacts from construction working areas not assessed. These may be outside redline.	Offline working involves working on the verge to be impacted, within the red line boundary, with no further impacts.
11640 – 11700 020 rev G	Unquantified additional impacts from construction working areas not assessed. These may be outside redline.	Offline working involves working on the verge to be impacted, within the red line boundary, with no further impacts.
11700 – 12000 021 rev G	Unquantified additional impacts from construction working areas not assessed. These may be outside redline.	Offline working involves working on the verge to be impacted, within the red line boundary, with no further impacts.

Site	Appendix DW8 remarks	Comments
12000-12390 021 rev G	<p>Unquantified additional impacts from construction working areas not assessed. These may be outside redline.</p> <p>(Correct) 2011 assessment of species-rich verge dropped from later SEI with no justification</p>	<p>Offline working involves working on the verge to be impacted, within the red line boundary, with no further impacts.</p> <p>The 2011 assessment is mixed, as can be seen from the text - with “reasonably diverse vegetation in places” and “elsewhere it was semi-improved or improved”. The first phrase referred to a small part of this long stretch and the assessment was made on the expectation that all vegetation will be lost. The use of grass reinforcement means that most species should be maintained and the impact is not significant.</p>
12000-12380 021 rev G	<p>Unquantified additional impacts from construction working areas not assessed. These may be outside redline.</p> <p>(Correct) 2011 assessment of species-rich verge dropped from later SEI with no justification.</p> <p>Road-side ditch/drain affected but not assessed</p>	<p>Offline working involves working on the verge to be impacted within the red line boundary with no further impacts.</p> <p>The 2011 assessment is mixed, as can be seen from the text - with “reasonably diverse vegetation in places” and “elsewhere it was semi-improved or improved”. The first phrase referred to a small part of this long stretch and the assessment was made on the expectation that all vegetation will be lost. The use of grass reinforcement means that most species should be maintained and the impact is not significant.</p> <p>No significant impact on road side ditch identified.</p>

<b>Site</b>	<b>Appendix DW8 remarks</b>	<b>Comments</b>
11200-020 rev G Site Access 4	Off-line construction area not defined. No botanical data, despite species of note being present	Offline working involves working on the verge to be impacted, within the red line boundary, with no further impacts. Area of field adjacent to site access is improved pasture. This area is dominated by improved grassland with Soft Rush.

**General comments:****Otter Surveys.**

All river crossings were surveyed for otters in 2010 and 2013 as stated in the CSEI. For the Afon Gam the Otter survey was undertaken from SH979074 upstream to SH976307 along Afon Gam, and from confluence to SH975074 upstream towards Dolwen farm including minor watercourse and drainage channel. No otter signs were found in 2011 or 2013.

Other watercourses were surveyed to at least 50m up and down stream of proposed works. No signs of otter were found and no otter holts or lie up areas were found. It is unsurprising that DW found spraints as otters were recorded on the main site during the site surveys (though well away from any construction areas). Otters are common in this part of Wales and all reasonable sized watercourses are likely to have otters pass along them at some time. No potential has been identified for the proposed works to have any impact on otters passing along the streams.

**Badger Surveys.**

All sections of proposed works were re-surveyed for badger in 2013 as stated in the CSEI. No signs of badger were seen. Where there were small areas of badger activity noted in 2010 none were seen in 2013. Unused badger holes noted in 2010 remained unused in 2013 with no sign of any usage between those surveys.

**Dormouse surveys.**

As described in the CSEI, nut searches for dormouse were undertaken in 2010 and no signs of dormouse were found. This is addressed further in Section 1 of my rebuttal.