

**Electricity Act 1989 (Sections 36, 37, 62(3) & Schedule 8) Town and Country Planning Act 1990 (Section 90) and The Electricity Generating Stations and Overhead Lines (Inquiries Procedure) (England and Wales) Rules 2007**

**Application by Vattenfall, Dated 30 November 2007 for Consent Under Section 36 of the Electricity Act 1989 to Construct and Operate a 59.5MW Wind Turbine Generating Station in Powys, Mid Wales ('Llanbadarn Fynydd')**

Ecology Rebuttal

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# 1. Ecology Rebuttal

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## 1.1 Comments on Alliance Submission ALL-SSAC-POE-29: Miss M Flanders, great crested newts and bat roost at Fiddler's Green, Felindre.

1.1.1 Miss M Flanders states (page 35, paragraph 2.3) that she has “resident colonies of bats and great crested newts, neither of which have been taken into account by the applicant.”

1.1.2 The location of Fiddler's Green at 870m to the nearest turbine is the key reason why ponds and thus great crested newts (GCN) would not have been surveyed. Prevailing best practice guidance (Great Crested Newt Mitigation Guidelines, English Nature, 2001(VATT ECOL-001)) advises that ponds up to 500m from a development site should be considered for survey. This was the guidance which was followed when surveying the Llanbadarn Fynydd wind farm site and its surroundings. Indeed, most GCN activity is typically encountered within ~250m of their breeding ponds. At 870m, Fiddler's Green is beyond the recommended survey distances, and thus the need for surveying was scoped out. There are no extenuating circumstances which would result in a requirement for great crested newts to be considered any further afield than 500m (such as poor quality habitats on or near to the site). In conclusion, no significant effects on great crested newts have been identified.

1.1.3 In respect of the bat roost: all desk and field surveys were undertaken in compliance with current best practice guidance which is considered to be the Bat Conservation Trust's Second Edition of the Good Practice Bat Survey Guidelines (FWL-BAT-001) and Natural England's Bats and Onshore Wind Turbines guidance (CPL-BAT-002). The 2012 desk studies extended up to 10km from the site (thus including Felindre village) which includes a review of all bat sightings and roosts registered with the local biological records centre (in this case Biodiversity Information Service for Powys and the Brecon Beacons National Park); that data was subsequently considered alongside that gathered and assessed on the site. The guidance recommends that all suitable roost features within 200m of turbines are considered for bat roosting potential; Fiddler's Green is 870m from the nearest turbine, and as such was outside the scope of field surveys required. Any bats from that roost which may fly over the

Llanbadarn site would have been recorded by the suite of studies undertaken there and thus taken fully into consideration in the subsequent assessment. No significant effects on bats were identified.

## **1.2 Comments on Alliance Submission ALL-SSAC-POE-51: (Conservation of Upland Powys) in relation to bats – collision/barotrauma risk.**

- 1.2.1 Conservation of Upland Powys (in paragraph 4 (c) page 81), refers to mortalities of bats in flight in relation to wind farms. Such risk to bats is fully recognised in the guidance employed, both to conduct the updated surveys carried out on the site in 2012 and as assessed and reported in the SEI (AMEC E&I, February 2013, ADD VATT-018).
- 1.2.2 The project assumption incorporated into the scheme design in relation to bats and risk of collision with turbines was based on emerging guidance available at the time of the surveys and production of the Environmental Statement (ADD VATT-003), and this ensured that turbines were sited at least 50m away from likely favoured foraging and commuting routes (such as hedgerows and woodland edges). Natural England's Bats and Onshore Wind Turbines guidance (CPL-BAT-002), clarified this further to mean that rotor blade tips should be 'at least 50m from habitat features or suitable roost structures'. Using the calculation within the guidance (which was developed by Entec UK Ltd, now AMEC E&I) and based on the dimensions of the turbines proposed at the development site, and adopting a precautionary maximum vegetation height of 20m, this equates to a stand-off distance of 75m between turbine base and habitat feature. Micro-siting / vegetation management will seek to maximise the distance between turbines and habitat features to ensure compliance with the guidance. Consequently, the project assumptions incorporated into the scheme would minimise potential effects on bats species, and this results in an assessment of negligible or no effects.