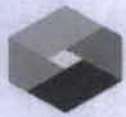


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**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: WATE-702-190
Eich cyf/Your ref: P/2015/0013

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Steve Packer
Planning Officer
Powys County Council
Neuadd Maldwyn
Severn Road
Welshpool
SY21 7AS

16th April 2015

Dear Mr Packer

**NEW SITE ACCESS ROAD FROM A4113 TO THE LLANSHAY LANE AND THE
CREATION OF PASSING PLACES TO ENABLE ACCESS TO THE CONSENTED
REEVES HILL WINDFARM AT AGRICULTURAL LAND SOUTH OF A4113 KNIGHTON
POWYS**

Thank you for referring us to the Stonewall Hill Conservation Group's (SHCG) recent correspondence and Powys County Council's response to the further information supplied in the Construction Environmental Method Statement (CEMP) submitted on behalf of the applicant for the above application.

Our previous advice including suggested planning conditions was based on the assumption that the Environmental Statement contained the correct information and calculations for the land to be impacted by the proposal, such that the compensation proposals would avoid habitat losses for Protected species. On that basis we then advised that the final detailed Construction Environmental Management Plan (CEMP) and Habitat Management Plan (HMP) proposals, including the duration/timing of management actions and species surveillance, could be agreed post consent following pre-commencement surveys which would provide a baseline for subsequent monitoring of impacts.

We agree with PCC ecologist's conclusions that the great crested newt's survey is incomplete. NRW advise Powys that they may want to request more accurate information from the developer on habitat losses, the number of ponds likely to be effected and their use by great crested newt, as this will have a bearing on mitigation and compensation proposals and the location of pre-commencement surveys. Having considered additional information recently made available by the SHCG and Local Planning Authority's Ecologist, we wish to provide further advice in respect of the protected species.

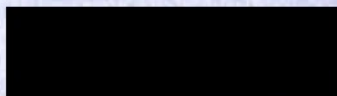
European Protected Species (EPS)

We consider that, the CEMP underestimates the number of existing ponds within the impact zone of the access route and also the amount of hedgerow and roadside verge likely to be impacted as a result of the proposal. As a result the mitigation and compensation measures so far proposed will need to be revised in accordance with the submission of more accurate information to evidence no deterioration of the supporting habitats for the great crested newt and dormice populations likely to be effected by the development proposals. As supporting habitat for European Protected Species these landscape features (Article 10 of the Habitat Directive and Regulation 39 of the Conservation of Habitats and Species Regulations 2010 (as amended)) form an important part of the assessment of impacts on the Favourable Conservation Status (FCS) of these species, it is essential therefore, that accurate assessments are made and equally that sufficient compensation land/land management is able to be secured through the planning process to compensate for habitat losses and, is evidenced by the applicant in the CEMP and HMP to fully inform the determination process.

Very important is the long term (over the lifetime of the development) security and management of the proposed habitat compensation/enhancement areas or features in the HMP. To ensure this outcome the applicant will need the legal rights necessary to manage the compensation land and we advise that Powys consider the use of planning mechanisms such as Section 106 agreements linked to the HMP.

I hope these comments are of assistance. If you have any queries, or if you require any further information, please do not hesitate to contact us at the above address.

Yours sincerely



Caroline Moscrop
Arweinydd Tîm / Team Leader
Tîm Rheoli Adnoddau Naturiol - Sir Faesyfed/ Natural Resources Management Team – Radnorshire