

Stonewall Hill Conservation Group: Objection to Application to Discharge Conditions 13, 14, 16, 17, 18, 24, 25 & 26 Attached to Permission DCNW/2008/1289/F: Proposed erection and operation of 4 wind turbines and associated access tracks, hard standings and sub-station.

Introduction.

SHCG objects to the Application to Discharge Conditions (ADC) 13, 14, 16, 17, 18, 24, 25 & 26 attached to Permission DCNW/2008/1289/F: **“Proposed erection and operation of 4 wind turbines and associated access tracks, hard standings and sub-station”**.

We object to:

1. Herefordshire Council’s procedural timetable.
2. The claim that the ADC contains no new information and conforms with the environmental information submitted, and undertakings made, prior to approval on 25.4.12.
3. The Hydrology submissions and proposed investigations and monitoring.
4. The Ecology submissions and proposed investigations and monitoring.
5. The failure to properly address the cross-border impacts of construction.

1. Herefordshire Council’s Procedural Timetable

- 1.1. In an apparent commitment to comply with the Developer’s request to *‘kindly expedite the discharge process’*, the Council is acting with undue haste and with disregard to its duties which are:- to follow correct procedure, to give due weight to consultee representations and public opinion, and to protect the environment.

27.03.15 Application Form date but Ecology Report is dated 31.3.15.

02.04.15 Thursday before Easter holiday: Site notice posted with inactive web-site reference, no indication of what the application was for, and response time *‘not later than 23.4.15.’*

07.04.15 Easter Tuesday: SHCG requested information about application.

08.04.15 SHCG wrongly advised it was possible to access application.

08.04.15 (p.m.): SHCG given different application reference no. to find application.

??.4.15 (probably 10th) Council rectified website so advertised instructions and reference find application.

13.04.15 SHCG ask for missing plans JU110-001, 2, 3, 5, & 6 referred to in application.

14.04.15 Council suggests these are just list of documents from application form.

17.04.15 SHCG finally given requested plans.

19.04.15 Missing plans added to website.

23.04.15 Consultation period ends *‘not later than 23rd April’* (site notice).

- 24.04.15 Council will make decision (Case Officer to John McCall, objector).
- 24.04.15 Developer has advised Council he will start development (Case Officer to SHCG).

- 1.2. The above timetable has not given consultees, or the general public, 14 days to respond to the complete application (including essential plans). The consultees will not have been aware of the new plans for development.
- 1.3. The Council apparently intends to scrutinise and address the responses, come to a decision, and issue permission within hours on Friday 24th April. This gives us no confidence that our points will be either fully read or fully considered.
- 1.4. The ADC says any further information can be obtained from the Case officer but he has failed to either acknowledge or answer a number of questions.

2. The ADC contains new information and does not conform with the environmental information submitted, and undertakings made, prior to approval on 25.4.12.

- 2.1. NTS 1 says '*no new environmental information is contained within the applications submitted*'. NTS 4 describes the purpose of the NTS: '*this document... considers the extent to which the information submitted with the applications to discharge planning conditions has already been considered as part of the decision process in accordance with the EIA regulations.*'

The NTS repeatedly claims (NTS 1, 15, 18, 20, 22, 24, 26 & 28) that the submissions have established that the ES/SEI have adequately identified and assessed the likely significant environmental effects of the development, that no additional information is required, and that no works or effects that have not already been assessed as part of the EIA process are envisaged.

- 2.2. NTS 5 says there are existing planning permissions for a Section 73 variation in conditions (Conditions 1 & 19) to alter site entrances to accord with Powys' requirements and for a Non-Material Amendment to Condition 1. This is **not** true. The Section 73 permission was revoked (N121004F) and therefore the permitted plans remain as identified in Condition 1. There has been **no** NMA to Condition 1.
- 2.3. The four new plans for the three site entrances (JU110-001, 002, 003, 004) do not accord with approved plans ES figs 7, 8 & 9, nor with the approved site layout plan date-stamped 9.9.11 (see Condition 1). The approved site layout plan date-stamped 9.9.11 does not show the correct site ownership and boundary. However this was correctly shown in a different site layout plan submitted with the Section 73 variation application (N121004F) for which permission was revoked. Roy Lewis withdrew his section of land from the middle of the application site (Doc. A).
- 2.4. Three of the four new plans show stippled areas of '*consented on-site road*'.

JU110-002 shows no consented area, and indeed could not do so, because site entrance 2 is approximately 50m further west than in the approved site layout and derives from the Herefordshire highway, whereas in ES fig 8, it is from the Powys Highway. In JU110-004, the construction compound is 10m closer to the Powys highway and the turbine track is 0.5m wider than in ES fig 7. The approved plans do not even accord with each other. None of the proposed development outside the stippled areas in the four plans is consented either by Herefordshire or Powys.

- 2.5. New plans show 80 (eighty) black and white bollards for the 3 site entrances. These have not been mentioned previously and create further industrial eyesores on quiet country lanes. There is no information about whether they will stay during the operational phase. These and other significant negative landscape impacts of the new plans for site entrances have not been considered in the ES/SEI.
- 2.6. ADC PWSPP Fig. 1 shows a wrong continuous site area, which makes it appear that springs 1 and 2 are within the site boundary whereas they are on the withdrawn section of land belonging to Roy Lewis (see above). Note that the Developer's consultant WHS made a single site visit relying on *'the local knowledge of a local landowner to verify previously supplied data'* (PWSPP 2) and that *'the landowner'* has *'confirmed that springs 2 and 3 are on his land and are no longer in use'* (10.4.15: response to EA). We presume that the landowner in question is Sir Simon Gourlay, who commissioned the Hydrology reports. PWSPP Fig. 1 also shows access to T3 from the Powys Road whereas JU 110-002 shows it 50m from the junction on the Herefordshire road and Figs. 1 & 2 of the Ecology Mitigation Plan show the track about 25m from the junction.
- 2.7. Plans JU110-001 to -004, show new bound track, mostly 5m wide, extending along the highway approx. 60m to 70m at each site entrance. JU 110-006 proves that extra marginal excavation on either side of turbine tracks and another 4.5m to 9.5m depending on terrain, giving land disturbance of roughly 10m to 15m width. Depth and location of cable trenches connecting to the substation (along access tracks and highways in trenches 45m wide and 1m deep according to ES 3.3.4.1) are not described. The land take is further increased by the large areas of unbound surfacing at the entrances, soakaways and a wheel cleaning area not shown in the ES. We do not believe this construction can be reconciled with a stated total land take of 3.19ha (ES & EMMP). Despite requests, the Case Officer has been unable or unwilling to provide an accurate figure for total land take.
- 2.8. Plans have only been presented for site entrances and yet the ADC requests **full** discharge of conditions. If these plans bear such scant resemblance to the approved plans, what other deviations from the ES/EIA and what further land-take can be expected?
- 2.9. The ES (3.3.5.9-13, Fig. 4, etc.) and the ADC NTS both include borrow pits and SW & GWMP has a section *"Borrow pit and site compound drainage"*. However, it appears that Sir Simon Gourlay has misinformed the consultant because, in response to complaints about PWS, already in 2010 the Developer gave an undertaking **not** to include borrow pits in the application (Doc. B).

- 2.10. Figures for loss of the iconic dry stone wall, a favoured newt habitat, to construct SE 3 are:
- | | |
|------------------------------------|-------------------------|
| ES 2008 (4.11.3; 4.11.3.12; etc.): | 7m |
| ES 2008 fig. 9 | 45m (our estimate) |
| EMS (p.1): | 25m in 'Enabling Phase' |
| EMS (6.4.3) | 'small areas' |
| JU110-003 | 58m (our estimate) |
| EMMP Table 1 (p. 3). | 58m |

Thus the construction plan represents an 830% increase from the ES text.

- 2.11. EMP Fig. 2 does not accord with SER 2008 Fig. 12. On Sir Simon Gourlay's land, a managed grassland block has been reduced and a mixed area of managed grassland and deciduous woodland has been added, without explanation. A fenced area for skylarks, which appears dangerously close to T1, has been added.
- 2.12. **The plans and submissions show extensive construction and other changes with significant environmental impacts and increased land take, which have not been considered before approval, have not been approved, and which contravene Condition 1. Contrary to the NTS claim, Condition 1 has not been varied or amended. Therefore the claims in the NTS are wrong and the application for discharge of conditions is entirely inappropriate and should be refused.**

3. Travel Plan

- 3.1. TP 4.1.2 says *'The contractor will ensure that all site traffic and deliveries only use the approved access route to the site.'* Fig. 2 – Site Access Route shows the approved access coming up Llanshay Lane from the A4113. Once again, the consultant has been misinformed. Powys Council (*'with a penalty for each and every breach'*) and the Construction Traffic Management Plan require all site traffic to use the proposed new haulage road crossing from the A 4113 to Llanshay Lane above Llanshay Farm.
- 3.2. **Condition 26 cannot be discharged.**

4. Hydrology Information (Conditions 13 & 14)

- 4.1. Ground Water & Surface Water Management Plan (GW&SWMP)(Condition 14).
- 4.1.1. The EA has confined its responses to the PWSPP although the GW&SWMP has implications for discharging Condition 13. We have seen no responses to this plan and do not know what authority scrutinises the discharge of Condition 14.
- 4.1.2. A desk study and single site visit support the statement that *'existing soil conditions should permit infiltration of surface water at a suitable rate'* (2.1.2.1) and pass

'through the adjacent grass verges and form part of any groundwater' (5.1.2). However there is frequent downstream flooding from Reeves Hill/Stonewall Hill.

The EA response, after a site visit, contrasts with this report. It said *'persistent heavy rainfall was immediately running off as 'sheet flow' from the surface with limited infiltration'* and *'on-going flooding problems in the area were clearly illustrated with photographic documentation taken during heavy rainfall events and during the site visit'* (Doc. C)

- 4.1.3 2.1.2 notes that the single carriageway roads have no formal drainage. The Developer has not submitted any plans for drainage of site entrances (130m total length and mostly 5m wide) or of 14 extensive passing places (about 900m total length and up to 6m wide) to Powys as part of P/2012/0573. A very experienced senior hydrologist has identified the lack of mitigation to prevent road surface run-off directly into PWS as the most serious fault in the hydrology reports. Drainage in Powys must be considered together with drainage in Herefordshire in order to safeguard ground and surface water.
- 4.1.4. Along the three x 60-70m site entrances there will be bound surface and therefore no grass verges. The remaining verges of the narrow highways (under 3m in places) are certain to become rutted, compacted and devegetated by construction vehicles (2,800 ALV/HGV journeys estimated). The run-off problem is likely to become apparent after construction and depend upon mitigation in Powys therefore risk and mitigation measures should have been agreed with Powys.
- 4.1.5. The Applicant, Bolsterstone plc., has undertaken to forgo on-site borrow pits and says all stone will be imported. This has apparently been ignored by the principle landowner, Sir Simon Gourlay, and the Agent, Dulas, who have commissioned these reports and failed to advise the consultants. Local residents have already advised Herefordshire and the EA (on 22.4.15) that a digger has been extracting stone on Sir Simon Gourlay's land for several days on a site marked on ES fig. 4 as a possible borrow pit.
- 4.1.6. **The applications DCNW/2008/1289/F and P/2012/0573 meet at the border and require cross-border work on hydrology between the officers of the respective LPAs, EA and NRW (who confirm they have not been consulted). Condition 13 should not be discharged before risk assessment and arrangements for drainage of the site entrances in Powys is secured to protect downstream land, property, access roads and watercourses.**
- 4.2. Private water Supplies Protection Plan (Condition 13).
- 4.2.1. The applicant's identification of private water supplies has a dismal history with no effort to contact residents, two separate fault-ridden reports and the EA finally agreeing that identification could be postponed until after determination. It is not true that the PWS were comprehensively considered pre-determination. There are still problems with springs, which we believe do not belong to the landowner, as he claims.

- 4.2.2. SEPA advice for wind farm construction is quoted:
'abstractions within 100m of all extractions less than 1m in depth and 250m from all excavations deeper than 1m in depth should be identified with a hydrological assessment.' The assessment considers turbine and substation foundations as >1m deep and all access tracks and hard standing as <1m deep.
- 4.2.3. Internal wind farm cable trenches (as opposed to grid export trenches), connecting the turbines to the substation along the turbine access tracks and public highways, have not been incorporated into any plans and therefore have not been approved. The ES 3.3.4.1 says they are *'about 1m deep and .45m wide'* (other wind farm specifications have trenches over 1m deep). Presumably there will be excavation of the T-junction for the cables from T3 & T4 to pass under the Willey Cross Road. The report does not consider this construction at all.
- 4.2.4. PWSPP 4.3.2 re Cooks House drinking water spring says *'The metalled road which is located between the proposed turbine and the water supply may, through possible drainage features, capture any surface runoff and divert from natural flow patterns'*. 4.9.2 re Carter's farm supply no. 6 says *'it is likely that the road running along the Western boundary of the proposed site would divert any surface flow from construction to the water supply depending on localised track drainage'*.
- 4.2.5. PWSPP 5 says, *'in line with relevant regulatory guidance, as detailed in Section 4, there will be no excavations or construction within the 250m of any abstraction springs, wells or boreholes'*. Cooks House spring 2 (in deeds of property) is within 250m of cable trenches.
- 4.2.6. Cooks House and Carters farm have the most vulnerable supplies. Note that both these supplies are at extra risk from cable trenches at least 1m deep and from unpredictable runoff from the Powys road which, in the case of Cooks House, is exacerbated by extensive construction of bound surface at site entrance 3.
- 4.2.7. We are aware that the EA has accepted the PWSPP but they were not sent details of the site entrances construction or cable trench construction, nor were they concerned with the unreliable assumption that the Powys verge would absorb all runoff. This discussion is in the SW&GWMP, which the EA did not address. We repeat our concern that no hydrology mitigation for Llanshay Lane and Stonewall Hill has been supplied for the Powys application.
- 4.2.8. Four shallow boreholes are to be sunk 10m downslope from the proposed turbine foundations. *'If no shallow groundwater is present, no monitoring of PWS abstraction is required.'* No time scale is given for the monitoring of boreholes, which could therefore take place over a short dry summer period. There is no undertaking to dewater the foundation excavations if there is ground water present. These are significant deviations from the ES/SEI.
- 4.2.9. The Scott Wilson letter 29.9.10, in FSEI Hydrology appendix (Doc.D), recommends observation boreholes saying *'it would be useful to obtain readings in the autumn/winter and spring to evaluate the likely seasonal maximum water level prior*

to construction' and the EA response to Herefordshire Council 3.2.11 following a site visit reports the commitment to collect baseline information from such boreholes during the autumn through to spring (bottom of p. 3). Dewatering is mentioned in the EA response (top of p. 4), the FSEI 5.2.6, and in Hydrology Appendix letter above.

- 4.2.10. Various local residents have complained of their PWS drying up in recent hot summers and are concerned that site works could diminish their supplies. We see no reference to quantitative monitoring of supplies.
- 4.2.11. **The PWSPP has retreated from protective undertakings for observation borehole monitoring and dewatering excavations. It fails to address the threat from runoff from highways, for which no mitigation has been proposed. It fails to take the impacts of cable trenches and site entrance construction into account and the extra risk caused for the most vulnerable two PWS. Once again there has been no cross-border work. Condition 14 should not be discharged.**

5 Ecological Reports

- 5.1. There are no valid baseline ecological surveys because the Phase 1 surveys are mostly 8 to 9 years out of date. For EIA purposes, ecological surveys are usually regarded as out-dated after two years.

The existing surveys are:

Habitat surveys	2006 & 2007	ES 2008	6.4.1.1
Winter birds survey	2006 Oct, Nov, Dec	ES 2008	6.4.2.8
Breeding birds survey	2006 & 2007	ES 2008	6.4.2.1
Reptile survey	2007 (6 days May, June)	ES 2008	6.4.4.9
Bat survey	2007 Summer	ES 2008	6.4.3.1
Autumn bat survey	2008	SER 2008	5.11
Badger & otter survey	2007 May	ES 2008	6.5.4.1
Pond site walk-over	2010	FSEI 2010	Ch.6.

In addition, Herefordshire is unable to locate the 2008 Autumn bat survey, which was never made public. No pre-construction surveys to establish valid baselines have taken place and none are proposed.

- 5.2. Parts of Phase 1 and Phase 2 development are in Powys and have not been approved. There is no evidence of cross-border co-operation between LPA Officers or between NE and NRW in the protection of habitats and species. Surveys for birds and mammals are proposed up to 500m from each turbine base and therefore require recording in Powys. The ES Phase 1 surveys did not achieve these 500m radius areas. They relied on sightings from the public road and a close parallel footpath and were mainly confined to Herefordshire. Quite apart from being out of date, the limited area surveyed in 2006 & 7 would not provide a comparable baseline for these proposed wider surveys.

- 5.1. Ecological Mitigation Statement (EMS) (Condition 16)
- 5.1.1. The EMS sets out Phase 1 '*enabling works*' which are, in fact, construction works: construction of access stubs from the highway, construction of one quarter of the construction compound and a construction of a track to connect the construction compound from Site Access 1. These were expected to begin mid-April and end mid-May. They are distinguished from Phase 2 '*construction works*', which are all the rest of the construction, including further work on the site entrances, up until site restoration.
- 5.1.2. The Phase 1 land take of habitat is said to be '*of site value only*' but the habitat involves road verges and destruction of 25m of stone wall known to harbour great crested newts and will take place in the nesting season close to zones favourable for skylark nesting (Doc.E & Doc.F). The EMS is '*targeted at the construction stage of the development*' so that Phase 1 construction in the May nesting season will presumably not be subject to mitigation for nesting birds as recommended in EMS 4. No doubt the Phase 1 and 2 distinction has some legal ulterior motive, but for ecological purposes, both phases are construction and both have ecological impacts on protected species. Both also include work within Powys, which has not been approved. The EMS should cover both construction Phases and should have been the result of collaborative work with Powys.
- 5.1.3. The Ecological Clerk of Works (ECoW) will be full time for Phase 1 and '*at least one day*' for Phase 2, although the duties suggest on-site presence is needed on many days. There is no application to discharge Condition 15, which covers the appointment of the ECoW. If site-works begin on 24.4.15, which is the intention of the landowner as communicated to Herefordshire Council, this may well be without an ECoW in post, which would contravene the undertakings to survey the land before the start of any vegetation clearance (EMS 4.2).
- 5.1.4. EMS 3. outlines three mitigation measures specific to Phase 2 including protection of the dry stone wall - yet 25m of dry stone wall will already have been removed in Phase 1. Roadside verges will be removed to facilitate access. This loss is described as '*insignificant*' although the verges are great crested newt, and possibly also nesting bird, habitat. It is explained that the verges will be reinstated, but figs. JU110-001, -002 & -003 show that they will be covered in bonded hard-standing.
- 5.1.5. Birds: EMS 4.1 refers to '*pre-construction and construction*' monitoring of birds to '*establish the baseline for breeding bird and/or wintering bird (depending on the time of construction) use of the site*'. These are not pre-construction surveys because they take place after Phase 1 construction when populations have already been disturbed. They will not establish baselines. Nor is there a commitment to cover all species: it is clear that the pressure of the construction time-table will override the need to survey both breeding and wintering birds.
- 5.1.6. Bats: similar criticisms apply to the plans for so-called '*pre-construction*' monitoring of bats after Phase 1 construction, in May/June, July/August and August/September.

- 5.1.7. SHCG has submitted a separate report on bats, giving the results of a 2013 bat survey on Stonewall Hill. We do not consider that the site is of 'low risk to bats' (EMS 5.2) considering that 7 species have been recorded including Noctules and Leisler's (rare in Herefordshire) which are particularly at risk from wind turbine fatalities.
- 5.1.8. Great Crested Newts: like Bats and Birds, GCN will be surveyed only after Phase 1 construction.
- 5.1.9. The Ecology Mitigation Statement (EMS 6.2 - 6.3) assumes impact on GCN will be minimal during Phase 1 and greater during Phase 2. Assumptions behind the claimed minimal impact of Phase 1 include: no works within 100m of known breeding ponds; road verges as poor terrestrial habitat; small population affected; wall destruction only during Phase 2 (6.4.3). All these are wrong: ES fig. 15 shows breeding pond 5.2 within approx. 50m of site access 2: compared with the alternative habitat of grazed grass, road verges provide good GCN habitat: EMMP p.5 describes '*the ubiquitous presence of GCN across the site*'; and 25m of wall will indeed be destroyed in Phase 1.
- 5.1.10. Proper use of Natural England's Generic Rapid Risk Assessment Tool would indicate a 'Red' result for **both** Phase 1 and Phase 2 in contrast to the EMS 'amber' result for Phase 2. Natural England has referred Herefordshire to their standing advice in their 15.04.15 response. Although EMS 6.4.3 describes removal of '*small areas*' of dry stone wall in Phase 2 at site entrances for T3 & T4, there will be no removal for the relocated T3 but a total of 58m for T4 of which 25m will have already been destroyed in Phase 1 prior to the assessment by means of 60 nights of pitfall-trapping (EMS 6.3.1)
- 5.1.11. NE's standing advice would indicate the need for a Protected Species Licence before the start of Phase 1.
- 5.2. Ecological Management and Monitoring Plan (EMMP)(Conditions 17 & 18)
- 5.2.1. The EMMP uses data from 2006/2007 and quotes extensively from the 2008 ES. In particular Table 1: Habitat Coverage and Land Take Calculation is probably very inaccurate. The habitats are likely to have changed with changing land-management and land take has been considerably increased in the new plans (see 2.7).
- 5.2.2. We note that possible negative impacts are discussed exclusively in terms of land-take and habitat. There is no reference to the well-documented negative impact, through direct kill on bats, raptors, and swallows, house martins and swifts. The population of red kites has increased considerably over the past 9 years. A long-term monitoring plan should discuss these impacts and consider ways to monitor them.
- 5.3. **The EMS and EMMP rely on survey data mostly from 2006 and 2007 which are not valid for EIA purposes. Pre-development surveys of protected species are required by planning regulations. The proposed so-called 'pre-**

construction' surveys will follow Phase 1 construction and give a distorted base-line with reduced populations, therefore subsequent monitoring would not accurately show any ecological change due to development. The early post Phase 1 surveys are likely to be further distorted by running concurrently with Phase 2 construction and therefore would not accurately show any ecological change due to the existence of an operating wind farm. Conditions 16, 17 and 18 should not be discharged.

6. Cross Border Impacts of Construction (Conditions 13, 14, 16, 17, 18 & 26)

- 6.1. Parts of both phases of development described in the application are in Powys - over which Herefordshire has no jurisdiction. The two access points from the Powys highway are continuous with development in Herefordshire and yet new Plans JU110-001 to -006 for these were only made available 6 days ago and had not been seen by Powys Officers or consultees.
- 6.2. The Developer has had a large role to play in the confusion over this application by submitting inconsistent information to the two authorities, in particular inconsistent plans for the same bits of development.
- 6.3. We are not even sure who 'The Developer' is. Sir Simon Gourlay, landowner, is commissioning environmental reports. He is also providing legal advice to the LPAs, which Herefordshire does not make available to the public but Powys does. The authors of the reports seem ignorant of the location of site access 2, the removal of borrow pits from the application by Bolsterstone, the existence of the border, and much other important information. The agent apparently does not know a permission was revoked.
- 6.4. The division into 'Access' in Powys and 'Wind Farm' in Herefordshire becomes impossible to sustain on the border. We have referred above to the failure of the LPAs and English and Welsh consultees to consult and co-operate over what is clearly a single development, with disastrous results for ecological and hydrological issues and serious environmental impacts. The responsibility for ensuring development complies with regulations plans and seeing that undertakings are adhered to is bound to be an administrative nightmare, in which natural species and local people will be the innocent victims.
- 6.5. Herefordshire will make a decision on the discharge of conditions although:
- the construction and mitigation described is partly in Powys
 - the new construction plans do not accord with either the Herefordshire approved plans or the plans submitted to Powys
 - the EMMP Habitat Management Plan includes management of species-rich verge vegetation in Powys
 - planned Phase 1 surveys extend onto Powys land
 - Powys considers that the Developer still needs to submit satisfactory EPS surveys
 - the travel plan ignores the required access route through Powys

SHCG believes that, under these circumstances, full discharge of conditions 13, 14, 16, 17, 18, 24, 25 & 26 makes a mockery of due procedure, will result in unlawful, unapproved, and uncontrollable development, and is an invitation to legal challenge.

(cont.)

Documents Attached

Doc. A: (13.06.11) Dulas to Herefordshire: Withdrawal of Lewis Land from application

Doc. B: (02.08.10) Bolsterstone to Herefordshire: Developer agrees no borrow pits

Doc. C: (07.02.11) EA report to Herefordshire after site visit

Doc. D: (21.10.10) Developer Hydrology Consultant letter with undertakings

Doc. E: (ES 2008) 2007 Phase 1 survey of GCN ponds

Doc. F: (ES 2008) 2007 Phase 1 survey of Skylark nesting sites

Stonewall Hill Conservation Group

23rd April 2015