

Our ref: P22-004 Kenfig Turbine Stakeholder Response Ecology

04 January 2022

Laura Tomos Harry
Planning Associate
Infinite Renewables Ltd
Bridgend

Dear Laura

Re: Kenfig Turbine Ecology Comments

Thank you for asking BSG Ecology to provide a response to comments from Bridgend and Neath Port Talbot County Borough Councils with regard to the planning application for a turbine on the Kenfig Industrial Estate, Neath Port Talbot.

The comments received from the respective County Borough Councils are set out below. Responses to each of the points raised follow.

Comments from Bridgend County Borough Council

In a letter to Neath Port Talbot County Borough Planning Department (Reference P/21/852/OBS) dated 26 October 2021, Jonathan Parsons (Group Manager Planning and Development Services) stated:

"I can confirm Bridgend County Borough Council has NO OBJECTION to this proposal but request that:

- consideration is given to the cumulative visual impact of the proposed turbine with others that have previously been approved/erected in the wider area;*
- an assessment of the impact of this turbine on birds travelling between Kenfig National Nature Reserve Pool and Eglwys Nunydd Reservoir is undertaken along with mitigation measures as required;*
- an assessment of the impact of this turbine on bats is undertaken along with mitigation measures as required."*

Cumulative Visual Impact

This is not an ecological matter and is not addressed in this letter.

Assessment of Impact of Turbine on Bird Flight Lines

Seventy-two hours of vantage-point survey were completed to determine bird flight lines in relation to the proposed turbine. Dates and times of watches are provided in Appendix 1 of the Ecological Appraisal. All target species flight lines are shown on Figures 2 and 3 of the report.

This survey work did not establish a narrow front flight line of waterfowl (or any other target species) over the proposed turbine location, albeit it did record a flight line of gulls moving towards / from Eglwys Nunydd in the wider landscape. A summary account of flight activity is provided in Sections 4.26 – 4.45 of the Ecological Assessment, with specific comment on gull flight lines in Sections 4.45 and 5.15 of the document, the latter as part of the assessment of likely impacts. As no issue was identified, mitigation was not proposed.

It is therefore considered that this comment has been addressed in the Ecological Assessment.

Assessment of Impact of Turbine on Bats

The Ecological Assessment includes the following information:

- Details of desk study data requested / obtained (Section 3.1)
- Approach to collection of baseline bat survey data (Sections 3.19-3.23 inclusive)
- Approach to bat data analysis (Section 3.24)
- Review of (bat-related) desk study information received (Sections 4.11 and 4.12)
- A summary of bat activity based on survey data (Sections 4.46-4.52 inclusive)
- An assessment of the likely impact of the turbine on bats (Sections 5.5-5.13 inclusive).

5.12 *et seq* of the Ecological Appraisal states:

“The overall risk assessment for the Site based on bat activity levels and Site risk (habitat quality and relative activity) is low. For pipistrelle species it is likely that collision risk will be further mitigated through the location of the turbine, which is well away from any linear features likely to be preferentially used for foraging and commuting. For noctule the distance from linear habitat features is unlikely to significantly mitigate risk, but habitat quality is low and detected activity was not high (and was lowest during autumn), indicating overall risk is low (based on the SNH et al approach).

While fatality of noctule, common and soprano pipistrelle is possible, it follows that there is no indication that this will be regular or predictable or that the local or favourable conservation status of these species will be affected.”

The location of the turbine is the most important factor in limiting the potential impacts on bats of the proposed turbine. No further mitigation is considered proportionate given the bat activity levels recorded. This is entirely consistent with guidance concerning bats and wind farms (as far as this applies to single turbines).

It is therefore considered that this comment has been addressed in the Ecological Assessment.

Comments from Neath Port Talbot Ecologist

In addition to requesting that Bridgend's above comments were addressed, two further comments were made by Neath Port Talbot ecologist Megan Price¹. These are (direct quote with numbering added):

- i. *What is the impact on Nathusius Pipistrelles from the Turbine – the species has been recorded and then not further discussed anywhere else and they are at risk of collision (and they are a migratory sp)*
- ii. *Clarification on why the turbine will not affect the nesting gulls on the adj. roof – it is just stated as being unlikely to have an impact (also will young gulls be more at risk of collision when they are learning to fly – this has not been mentioned)*

Nathusius' pipistrelle

Nathusius' pipistrelle was not definitively recorded at the site. The species has partially overlapping call parameters with (the considerably more abundant / ubiquitous) common pipistrelle, which was confirmed as using the area and roosting locally from survey and desk study data respectively, and is intuitively very likely to account for the records that could not be definitively assigned to pipistrelle species.

If the assumption is made that all of the undetermined records refer to *Nathusius' pipistrelle*, however (which seems extremely unlikely based on the previous rationale), the species was recorded once every 50 hours in spring and once every 100 hours overall (see Table 2 of the Ecological Assessment). It

¹ In an email to Steven Jenkins, Senior Development Manager at Neath Port Talbot County Borough Council.

cannot be assumed from the data that bats either passed over the turbine location (as detectors have omni-directional microphones) or were flying at collision risk height; further, only a proportion of bats passing through the rotor blades will be killed. The data collected indicate that occasional transitory (directional) flights through the area by (indeterminate) pipistrelles occur; the habitat around the proposed turbine is hard standing with little foraging potential; there is very little potential for individual bats to linger in the area elevating the risk of fatality. This result, in terms of use by pipistrelle species, is therefore as expected.

Nathusius' pipistrelle is considered to be of Least Concern (Red List of the IUCN 2006) in conservation terms, and occurs across much of Europe. The species undertakes seasonal migratory movements, and overwinters in western / south-western Europe (Dietz *et al.*, 2009). It is both a localised resident and seasonal migrant in South Wales (the species occurs throughout much of Europe), albeit no known breeding roosts close to the site were returned by the desk study.

Given the fact that records are likely to relate to common pipistrelle, recorded activity levels in indeterminate pipistrelle species were very low, the turbine will be located away from linear features likely to be used by bats, immediate foraging potential is minimal and only a proportion of bats recorded by detectors are likely to be affected by the turbine, any impacts on Nathusius' pipistrelle are considered negligible.

Gulls

With regard to gulls, it is considered unlikely that the breeding colony will be affected as gulls are a feature of many industrial sites / those subject to regular disturbance and readily habituate to the presence of people and plant. The roof space is also very large (at approximately 72,000 m²), the colony size is relatively small (45 active nests were noted), and the turbine will be located on hard standing to the south-west of the building such that the tips of the blades will be no closer than approximately 54 m to the west and 79 m to the south-west of the roof at their closest points. It follows that if localised displacement of breeding gulls from those areas of roof closest to the turbine occurs, there is considerable potential for nesting on other areas of the roof. However, there is no reason to suggest this will occur.

The rationale for assuming high rates of turbine avoidance by gulls are set out in Section 5.17 of the ecological assessment. The avoidance rate applies to gulls irrespective of age and is based on empirical data. Juvenile gulls are intuitively more likely to die from a range of causes than more experienced adult birds (as survival rates of all first year birds are lower than older birds / adults in normal circumstances); conversely, as both herring and lesser black-backed gulls are long-lived species the loss of adult birds would be far more likely to have a demonstrable impact on the colony size and wider population than first year birds with less likelihood of being recruited to the breeding population.

I trust this addresses the queries adequately.

Yours sincerely

Owain Gabb

Director

For and on behalf of BSG Ecology

