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Date: Wednesday, 23 October 2024

Midlothian Council Reference: 23/00795/S36

ECU Reference: ECU00004661

Dear Martin,

MIDLOTHIAN COUNCIL REFERENCE 23/00795/S36 FOR THE PROPOSED TORFICHEN WIND FARM IN THE PLANNING AUTHORITY AREA OF MIDLOTHIAN COUNCIL.

Thank you for your interim response (dated 1 March 2024) to the above planning application. I am writing to provide further detail and clarification on ecology and biodiversity enhancement matters raised in your response, adopting the respective queries unique identifiers for ease of referencing.

Query #BEMP1 – the applicant is invited to review the oBEMP to examine ways in which the enhancement measures can be improved to address the requirements of NPF4 Policy 3 b) iv).

Query #BEMP2 – the applicant is invited to amend the oBEMP to signal their intent to pursue more substantial enhancement opportunities. These can then be secured by condition, requiring the engagement with statutory bodies and examining the potential for significant enhancement measures resulting from development.

Response to Query #BEMP1 and Query #BEMP2

The OBEMP is undergoing review and a revised and updated OBEMP with associated revised Biodiversity Net Gain (BNG) Metric will be submitted along with Further Environmental Information (FEI) for the Proposed Development in due course.

Query #BEMP3 – the applicant is invited to re-assess the potential impact on the natural heritage assets of Midlothian from the delivery of abnormal indivisible loads to the site.

Response to Query #BEMP3

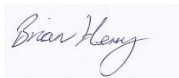
The interim response states that potential for tree and vegetation removal along the abnormal indivisible load delivery route has not been picked up in the ecology chapter of the EIAR. This results in a miscalculation of the net biodiversity gain, the extent and significance of this is unknown.

The transport assessment in Appendix 11.1 of the EIAR has been reviewed from an ecology perspective. A limited number of areas are predicted to be subject to a small amount of vegetation trimming or clearance, these are all very narrow verge areas immediately flanking the existing public carriageway (generally from around Pathhead and along the minor roads to the site), as show in the respective drawings in Appendix 11.1. Photographs of several of these areas are also provided in Appendix 11.1. Vegetation trimming in road verge habitats such as this is not expected, or predicted, to have any notable effects on ecology. Vegetation clearance may take the form of verge habitat removal and/or tree removal. Verge habitats along roads such as these, and as can be seen in several photographs and aerial/Streetview imagery of the potential minor land-take locations, primarily contain low conservation value habitats; predominately neutral grasslands and weedy/ruderal communities, which are also likely subject to negative impacts from traffic and road run-off and spray. The minor scale of land-take impacts on these low value verge habitats from the Proposed Development is considered negligible/minor and not significant. The transport assessment also indicates that some limited tree removal may be required in a few locations. Trees will only be removed where necessary, and ecological checks of any trees identified for removal will be conducted prior to any works, being managed through the presence of an Ecological Clerk of Works (ECoW) and application of the Species Protection Plan (SPP; outline provided in Appendix 8.5 of the EIAR). With such standard mitigation in place, no significant effects are predicted.

The losses of lower value verge habitats as discussed above is of such a scale as to have a negligible impact on the BNG calculations. The OBEMP as it stands, and as highlighted through the BNG metric, already fully mitigates/compensates for habitat losses associated with Proposed Development and provides further enhancement of 11.8% above the pre-development baseline value. Any additional minor loss associated with the abnormal indivisible load delivery route does not affect the delivery of significant biodiversity enhancement at the site. Furthermore, as noted above, a revised and updated OBEMP will also be present with the FEI.

Yours sincerely,

Brian Henry,



Principal Ecologist

MacArthur Green is helping to combat the climate crisis through working within a carbon concious and biodiversity positive business model. Read more at www.macarthurgreen.com.



E-mail: brian.henry@macarthurgreen.com

Date: Tuesday, 16 July 2024

NatureScot Reference CDM173439

ECU Reference ECU00004661

Dear Paul,

RE. THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 ELECTRICITY ACT 1989: APPLICATION FOR SECTION 36 CONSENT FOR THE PROPOSED TORFICHEN WIND FARM IN THE PLANNING AUTHORITY AREA OF MIDLOTHIAN COUNCIL.

Thank you for your consultation response (dated 21 February 2024) to the above planning application. I am writing to provide detail and clarification of our proposed approach and gain further guidance from you on the issues you raise specifically regarding peatland and biodiversity net gain.

Peatland Habitat

Importance of Peatland at Torfichen

Quality and Condition of Peatland at Torfichen

The consultation response considers the peatland at the site to fall within the priority peatland category and that this has been very broadly defined in the letter as, “*both blanket bog, wet modified bog and dry modified bog to be priority peatland habitats. The ‘blanket bog’ habitat category is used for relatively undamaged blanket bog, with Sphagnum usually abundant. Significantly damaged blanket bog, in which Sphagnum is much reduced or absent, is classified as modified bog*”. However, the [guidance](#) defines priority peatland as, “*Priority peatland is peatland that corresponds to the below habitat communities and shows evidence of being undisturbed and actively forming peat*”. The EclA (Chapter 8) and associated NVC and Habitats Survey Report (Technical Appendix 8.1) provide detailed consideration of the condition of peatland at the site undertaken as part of NVC surveys (detailed vegetation surveys which are not completed as part of a Peatland Action application). Chapter 8 of the EclA (paragraphs 8.6.8-8.6.10) explains that the site lies within an area of Class 1 priority peatland according to the [Carbon and Peatland Map](#) however this habitat “*has become heavily degraded M2ob/M2o dry modified bog and in poor condition. Some areas have been heavily grazed upon by livestock and have transitioned to a degraded form of M15d wet dwarf shrub heath*” (paragraph 8.6.26). Furthermore, relatively higher value blanket bog habitat (i.e.,

M19) has been avoided completely through design and the NVC habitat communities impacted by the Proposed Development fall within the guidance category of “*unlikely to raise issues of national interest*” and are not undisturbed in nature due to a long history of livestock grazing on the site as noted above.

The peatland at the site also does not exhibit key ‘near-natural’ characteristics and, at best, would be considered ‘modified’. When comparing the peatland onsite to the guidance and the assessment criteria for determining if the peatland is potentially of national interest, then the site does not meet these criteria, for example there is reduced peatland forming vegetation, high levels of disturbance, lacks a natural surface pattern, lacks abundant Sphagna-rich ridges and lacks the specific species mentioned in the guidance assessment.

Therefore, considering the above, the peatland at the site does not raise issues of national interest and given its degraded nature would fall within the Class 2 Peatland category which has restoration potential.

Compensation Area

NatureScot advise that a 1:10 compensation ratio should be achieved at the site along with a 10% enhancement of the baseline area in accordance with their [guidance](#). Further opportunities may be explored with the landowner; however, it is likely to be the case that a 1:10 ratio will not be achieved at the site based on the criteria specified in NatureScot’s letter for determining the ‘restoration footprint’ which excludes grazing management and only allows a 10m buffer around areas restored by damming or restoring hagsgs. We disagree that the area benefiting from grazing management (and regenerating tree/shrub removal) should not be included within the compensation package given that it is the primary factor that has historically driven, created, and now continues to maintain the degradation of the modified peatland at the site. Furthermore, NatureScot’s position is inconsistent from the Peatland Code which allows carbon units to be claimed for moving between peatland condition categories of ‘[Modified Bog](#)’ to ‘[Rewetted Modified Bog](#)’ where the composition of the vegetation is improved. Claiming this condition change is possible as it meets [Test 1](#) of the Peatland Code Additionality Rule ‘A peatland restoration project passes the legal test when there are no laws, statutes, regulations, court orders, environmental management agreements, planning decisions or other legally binding agreements that require restoration, or the implementation of similar measures that would achieve equivalent levels of GHG emissions reductions’. NatureScot do advise that including the land management measure of grazing in the OBEMP is ‘advisable’, presumably given the importance controlling grazing levels to achieving successful peatland restoration.

The consultation response also states that ‘*the application site has a total priority peatland habitat extent of 131.82 ha (i.e. 19.05 ha blanket bog plus 6.16 ha of wet modified bog, plus 106.61 ha of dry modified bog), we would expect another 13.1 ha to achieve enhancement (i.e. 10% of the baseline extent of priority peatland habitat on the application site)*. As has been discussed above, the peatland impacted at the site is not considered priority peatland due to its characteristics and condition, and furthermore in line with guidance it would be unlikely to raise issues of national interest.

In terms of the next steps, we will provide more detail on grazing management in the revised OBEMP (to be included in the future submission of Further Environmental Information (FEI)) which will allow, along with other measures, the restoration of bog at the site to re-wetted modified bog. Based on our above justification, we propose that this area will contribute to the compensation package for the site. Furthermore, we note that the prescription of tree and scrub removal from the wider bog is a recognised enhancement measure which is important to consider in the compensation plans for the site.

Restoration Information Provided in OBEMP

NatureScot advise that the information provided in the OBEMP should be similar to a Peatland Action application. This level of information to inform the detailed restoration of the site represents an additional significant cost at the pre-consent stage and so a reasonable balance needs to be struck between information necessary to inform the planning application at this stage versus the detailed level required to inform site restoration activities. It is also important to bear in mind that NVC surveys and associated target notes have been completed to provide detailed information on the peatland communities at the site in addition to their condition. This level of detailed survey is not required as part of a Peatland Action application, where instead a simplistic categorisation of peatland is required to inform the restoration plan.

As has been noted above, none of the peatland within the site would be considered near-natural, and at best is generally considered modified. Further information will be provided in the updated OBEMP, including further information on grazing densities and practices at the site. With regards to describing restoration methods, these would follow [best practice](#) as noted in the OBEMP.

Biodiversity and OBEMP

Ornithology

A number of comments were made with respect to the current measures proposed within the OBEMP and mitigation and compensation for predicted ornithological impacts. It should be noted that the OBEMP was not designed to specifically address mitigation and compensation measures for ornithology, rather to provide compensation for habitat losses and provide additional habitat creation and restoration to enhance general biodiversity at the site where opportunities allow, seeking to achieve biodiversity net gain overall. For example, the purpose of the species-rich grassland creation proposal was primarily for floral biodiversity and benefits to pollinators etc, rather than curlew. However, although not the primary aim, several of the proposals within the OBEMP may have secondary beneficial effects for ornithology and the local bird assemblage.

The Applicant is preparing an FEI to be submitted in due course, this will include further measures and details on the planned mitigation and compensation related to ornithological impacts.

Positive Effects for Biodiversity

The consultation letter states, *“biodiversity enhancement measures should go beyond mitigation and compensation to ensure that net positive effects for biodiversity are achieved”* and also advises *“that the OBEMP should go further and that proposals to deliver positive effects should be clearly*

distinguished from mitigation and compensation measures to ensure that all requirements are fulfilled". As detailed in the EclA (Chapter 8) there were no significant effects predicted on habitats. However, compensation for habitat loss, regardless of habitat types, and further significant enhancement of the site would be delivered through the OBEMP – a suitable metric was used to demonstrate this.

In simplistic terms, the metric calculates the amount of baseline 'biodiversity units' (BU) present on the site and considers all habitat types. During construction habitats are permanently lost, or temporarily impacted and restored, this results in a loss of BU from the baseline total. Habitat creation, restoration and enhancement measures are then formed and proposed to create higher value or higher distinctiveness habitats relevant to and suitable/appropriate/achievable for the site, which generates additional BU. The BU generated initially count towards and compensate for the BU lost during construction, in order to get back to the baseline BU value. Additional BU generated above the baseline and pre-development value are then delivering a biodiversity net gain. The amount of net gain is reflected as a percentage of the BU gain on the baseline value. The proposals in the OBEMP as submitted create enough BU to compensate for all habitat losses and impacts during construction. The OBEMP submitted at the application stage predicted the delivery of 11.8% net gain above pre-development value from the restoration and enhancement measures contained within. Clarifications have since been received from the BNG team at SSER on certain aspects of the metric tool and the appropriate BNG assessment area (which has been agreed in their consultations with NatureScot). As a result, the percentage net gain at the site from proposed OBEMP measures has likely been greatly underestimated, a revised BNG metric calculation will be presented within the FEI OBEMP. It should also be noted that at the time of application, and as yet, there is no mandatory requirement to undertake or provide a biodiversity net gain metric (although it is acknowledged that this will likely be a requirement in the future), nor is there a percentage gain threshold that requires to be met. The Applicant voluntarily included information using a metric to demonstrate biodiversity enhancement can and would be delivered at the site, furthermore the percentage net gain represents a significant enhancement (bearing in mind the statutory significant net gain requirement in England is 10%, for comparison), and revised metric numbers will be presented in the FEI OBEMP.

The consultation letter also states, *"the OBEMP also proposes delivery of enhancement in distinct parcels and indicates the use of fencing to control or exclude livestock. However, a more progressive approach, which may benefit the entire site, would be to carry out a Herbivore Impact Assessment, and adjust the livestock (and deer) pressure accordingly, so that habitat condition improved across the entire development site"*. The land parcels proposed are where it is considered that measures or proposals are suitable/appropriate/achievable for the site, it has to be acknowledged that only certain parts of a site may be suitable for restoration or enhancement, and other constraints and landowner concerns/agreements must be factored in. Adjusting deer pressure across the entire site is also likely to be an unrealistic aim for the Applicant and respective landowners; deer management is only effectively managed at a regional level and requires coordinated control over a large area, for instance through Deer Management Groups (DMG), and therefore the use of fencing at the site cannot be ruled out.

Yours sincerely,

Brian Henry,



Principal Ecologist

MacArthur Green is helping to combat the climate crisis through working within a carbon concious and biodiversity positive business model. Read more at www.macarthurgreen.com.



Brian Henry
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20 September 2024

Our refs: CDM173439 & CDM176341

Dear Brian

RE. THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 ELECTRICITY ACT 1989: APPLICATION FOR SECTION 36 CONSENT FOR THE PROPOSED TORFICHEN WIND FARM IN THE PLANNING AUTHORITY AREA OF MIDLOTHIAN COUNCIL

Many thanks for your letter received 16 July 2024.

In response to the points you have raised:

Peatland habitat

As per our guidance (<https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management>), communities M20, M15, M16 and M25 are described in the following way:

- M20 - Eriophorum vaginatum is a **degraded form of M19 where the heather and most of the Sphagna have been eliminated by heavy grazing**, repeated burning and/or atmospheric pollution.
- M15 - Trichophorum-Erica, M16 Erica-Sphagnum and M25 Molinia-Potentilla are classed as blanket bog when they are on deep peat, as **they are almost always a replacement for the original bog vegetation following unfavourable management such as burning on too short a rotation followed by heavy grazing**.

Both are clearly defined as “**priority peatland communities that are unlikely to raise issues of national interest**”. Our guidance therefore confirms that “impacts on these communities are unlikely to raise issues of national interest **but should still follow the mitigation hierarchy**”.

We can confirm therefore that M20, M15, M16 and M25 communities are priority peatland and the following mitigation hierarchy (<https://www.nature.scot/doc/developing-nature-guidance>) should therefore be followed:

- Avoid - by removing the impact at the outset wherever feasible
- Minimise – by reducing the impacts that are unavoidable
- Restore – by repairing and enhancing damaged habitats and disturbed species
- Offset – by creating new habitat, preferably on-site but can be off-site, to compensate for any residual impact that remains

Compensation Area

As per our guidance (<https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management>):

“The HMP, or outline HMP, should be sufficiently detailed and should identify restoration areas for offsetting and enhancement, using site survey data to demonstrate the areas are appropriate and are likely to result in the outcomes proposed. Our current recommendation is that restoration to achieve offsetting (i.e. compensation rather than biodiversity enhancement) would be in the order of 1:10 (lost:restored), i.e. 1ha loss of peatland should result in measures to restore 10ha of peatland, **using the same buffer to assess loss and restored areas** (e.g. 30m). The basis of this recommendation is:

- Peatland is an important habitat type, supports biodiversity, and is a key carbon store, especially in a climate and nature crises.
- Peatland cannot be created in areas where it doesn't already exist. Peatlands only exist in limited situations where the physical (climatic, topographic, hydrology) and chemical (pH and low nutrient availability) conditions allow. In addition peat soils accumulate at a rate of approximately 1mm per year, as such take a long time to recover.
- Degraded peatland can still be capable of storing carbon and supporting rare species. If the condition is assessed as being degraded, restoration to improve condition and functioning is recommended.
- Peatland restoration can improve the condition and function of an existing peatland, but crucially it does not increase the extent of peatland. As such, restoration of an area of peatland to offset that which is lost, needs to be greater to that which is lost. It is also important that areas of restoration will restore equivalent habitat to that which will be lost as a result of the development, to ensure that it does not equate to the overall loss of a peatland.
- Improving habitat and hydrological condition and function is a long-term objective as it can take many years to achieve. It is also not possible to guarantee successful restoration, even when following best practice.

We advise that applications proposing less than 1:10 restoration should clearly address the factors noted above as part of their reasoning.”

Therefore, our original recommendations on the hectareage of restoration needed to achieve compensation and biodiversity enhancement still apply (please see letter dated 21 February 2024).

In relation to areas of grazing management being included within the compensation package, we note the points you have raised but our original recommendations as per our guidance still apply (<https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management>):

- **Proposals to only manage/reduce grazing and browsing levels or other impacts on peatland are not considered as offsetting.** Damage caused by overgrazing and trampling by livestock and wild deer numbers should be managed through **GAEC 5** and **Code of Practice on Deer Management**. However including this land management measure **in combination with restoration** would be advisable.

Restoration Information Provided in oBEMP

As outlined by the Scottish Government, and as per our guidance, (<https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management>) our role requires that:

- For **consultations under section 36 or 37 of the Electricity Act** we should provide advice on whether the mitigation hierarchy has been followed and, following our assessment of the impacts on priority peatland habitats, whether impacts have been sufficiently offset, whether or not they raise issues of national interest.

To be able to carry out such an evaluation of your peatland restoration proposals, we require sufficiently detailed information at application stage as outlined in our original response and in Appendix 2 of the guidance.

Biodiversity and oBEMP

In the submitted EIA, it is stated that the proposed site is of national importance as a habitat for breeding birds:

- “The overall conservation value of the breeding bird community, measured from the core survey data as the breeding bird assemblage score, was 46. This is above the threshold for national importance (40) for the main habitat within the survey area, ‘Upland moorland and grassland with water bodies’ (Drewitt et al. 2020). The core survey area therefore supports a nationally important breeding bird community.”
- 22 red-listed species were found breeding on site.
- Regionally important numbers of certain species including curlew and snipe were found breeding on site.
- Although not covered correctly in the EIA, black grouse are also breeding on site in regionally important numbers.

As outlined in the EIA, the “key issues for the assessment of potential ornithological effects relating to the Proposed Development” (SNH 2018a) are:

- Direct loss of bird habitat through construction of the Proposed Development
- Disturbance of birds during construction and operation
- Collision risk to birds during operation.

It is recognised in the EIA that:

- “Direct habitat loss will reduce habitat availability to the species breeding and foraging on the site, including one high value breeding key species (golden plover), two medium value (lapwing and curlew), one low value species (greylag goose), and six high value species recorded foraging (red kite, hen harrier, goshawk, peregrine, merlin and short-eared owl).”
- “The Proposed Development is not likely to result in any significant ornithological effects in EIA terms, but nonetheless, the best practice measures described below would be followed throughout all of the Proposed Development, and to ensure compliance with the nature conservation legislation. **Mitigation is also required to ensure that the development is compliant with the biodiversity objectives of NPF4.**”

Mitigation aims of the project are then explained:

- Mitigation of the Construction Phase: **“An oBEMP will be delivered to offset habitat loss, including for the breeding waders on site (given the potential for displacement from the Proposed Development). This will deliver the biodiversity gain required under NPF4.”**
- **“Mitigation of the Operational Phase: The operational ornithological impacts of the Proposed Development will be mitigated (in order to deliver a net gain in line with NPF4) through a combination of the enhancements that will be delivered through the oBEMP, and further measures that RES provide that will be developed and implemented in consultation with RSPB, NatureScot and the Southern Uplands Partnership (SUP). These will include the development and implementation of a regional plan for breeding waders, and contribution to the SUP Black Grouse project.”**

Also, it is recognised in terms of cumulative impacts for curlew:

- The **“worst case does not take into account the fact that there are habitat management measures in place or planned for most of the developments that would at least partially offset the loss through disturbance”**.

And the EIA in response to the RSPB scoping comment “with NPF4 now approved by the Scottish Parliament and soon to be adopted we would expect the outline Biodiversity and Enhancement Management Plan (oBEMP) to include proposals for mitigation and enhancement of habitats and species on site and discuss opportunities for development and enhancement of wider Nature Networks”, states the “oBEMP includes such measures”.

In light of the above, it is recommended that commitments made in the EIA be reflected fully in the oBEMP and as per the following guidance (<https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-enhancing-biodiversity>).

- “Development proposals should clearly set out the type and scale of enhancement they will deliver, ensuring that applications clearly distinguish between those elements mitigating or compensating for adverse effects and those delivering enhancement.”
- “Enhancement requires consideration of all biodiversity (including birds and other protected species), not just the significant effects that are the focus of EIA.

Please note that black grouse have not been properly considered in the EIA (please see our previous response from 21 February 2024) but are breeding on site in regionally important numbers. It is recommended therefore that impacts on the species should be taken into full consideration in the oBEMP.

SSE Renewables have made the following statement about the metric you have chosen to use in your biodiversity enhancement calculations

<https://www.sserenewables.com/media/vgsdoav3/sser-biodiversity-net-gain-report-nov-2022-final.pdf>):

- “Using a metric to quantify Biodiversity Units based on habitat type is a ‘proxy’ for understanding the wider biodiversity value of a site. While this is fundamental to our approach on BNG, **we also recognise that our developments have the potential to affect**

protected (or priority) species, wider ecosystem services and people, either directly or indirectly.”

However, DEFRA, upon whose metric the SSE Renewables metric is based, recommend (https://assets.publishing.service.gov.uk/media/669e45fba3c2a28abb50d426/The_Statutory_Biodiversity_Metric_-_User_Guide_23.07.24_.pdf) following up to date industry good practice principles principles (CIRIA, CIEEM and IEMA) (<https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>) including:

- “Principle 6. Achieve the best outcomes for biodiversity - Delivering compensation that is **ecologically equivalent in type**, amount and condition, and that accounts for the location and timing of biodiversity losses”

While CIEEM (<https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practical-guide-web.pdf>):

- Directs that compensation of biodiversity loss be “as close as possible to the location where effects have occurred and **benefit the same habitat and species as those affected**”. (<https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practical-guide-web.pdf>)
- Recommends avoiding pitfalls when quantifying losses and gains in biodiversity such as “missing opportunities to **benefit key species that are affected by a project but not directly accounted for within a biodiversity metric**”.

As per NatureScot guidance (<https://www.nature.scot/doc/developing-nature-guidance>):

- “Offsetting for residual impacts should **seek to replace with ‘like for like or better’, taking into account the distinctiveness and functionality of the lost habitat and species, and any identified priorities for biodiversity action.**”
- “Wherever possible measures for enhancing biodiversity should be provided within the development site, where the loss of, or damage to, biodiversity is taking place. This is an equitable approach, that seeks to ensure that areas of development do not become ‘nature poor’ as a consequence of **the loss of habitat reducing habitat connectivity and species range, to the detriment of both people and biodiversity.**”
- “For development with nature to work, an understanding is required of the main natural assets of the site and its surroundings (particularly the ability of soils to support proposed species and habitats), the opportunities they provide for enhancement, and how the development will be used. **Consideration should be given to any opportunities to contribute towards restoring or enhancing any habitats and species identified as national, strategic or local priorities.**”

Therefore, we recommend that the oBEMP does specifically address mitigation and compensation measures for ornithology and in particular for the species of conservation concern whose habitat availability will be reduced.

We look forward to receiving your Additional Information on the project.

Yours sincerely,

Paul Anderson

Operations Officer South

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