

INTERNAL MEMORANDUM

To: Caroline Pulley
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 1

Date of previous memo for pre-app

(PA/21/0016): 29/03/2021

Date: 14/10/2021

SUBJECT: P/21/0352 | PROPOSED SINGLE STOREY BUILDING TO ACCOMMODATE DAY CARE FACILITIES WITH ASSOCIATED NEW FOOTPATH, LANDSCAPING AND PLAY AREA | DOWLAIS PRIMARY SCHOOL HIGH STREET CAEHARRIS MERTHYR TYDFIL CF48 3HB

Proposed development site on grassland, with adjacent broadleaved woodland habitat.

The following [updated] arboricultural report has been submitted in support of the application:

1. Arboricultural Implications Assessment and Method Statement. Flying Start Dowlais. Revision 1 - August 2021. Steve Ambler and Sons Tree Specialist Ltd.

Previous comments at the Pre-App enquiry stage can be seen below in black – further comments for full application shown in **green**:

Trees

Planning Policy Wales (PPW) Edition 11 - 24th Feb 2021 states that planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly **avoided**, then minimized, mitigated, and as a last resort compensated for; enhancement must be secured wherever possible. The first priority for planning authorities is to avoid damage to biodiversity and ecosystem functioning. Where there may be harmful environmental effects, planning authorities will need to be satisfied that any reasonable alternative sites that would result in less harm, no harm or gain have been fully considered.

This policy is mirrored within the MTCBC Replacement Local Development Plan (2016-2031) - Policy EnW1: Nature Conservation and Ecosystem Resilience.

In order to **avoid** the ecological issues in relation to the loss of trees, the scheme should be adjusted in order to retain the trees. I am in agreement with the comments below as set out on page 8 of the Arboricultural report:

'The repositioning of the proposed building several metres beyond the limits of the RPA to the northwest is likely to remove all the present conflicts with T1, T7 and G2.'

The scheme has now been amended with the building repositioned. There is still an element of conflict between the building position / paved areas and the RPAs and

canopies of T1 and G2. In addition, the report states that the close position to T7 will become problematic as its crown develops to maturity.

Page 6 states:

'Under the current proposal, no trees are lost to this proposal.'

I welcome the change in terms of no loss of onsite trees, however, I would recommend MTCBC's tree officer (Andrew Taylor) assesses the Arboricultural report in terms of tree health.

NB in addition, trees requiring pruning will need an assessment (by a suitably qualified ecologist) of those parts of the tree to be removed. Further measures may be required if the tree parts include features suitable for roosting bats. Works will be undertaken outside of the bird breeding season (generally from 1st March until 31st August, although birds are known to nest outside of these dates in suitable conditions).

Reptiles

The grassland habitat has suitability for reptile species. Therefore, a Reptile Mitigation Strategy must be submitted for approval in writing prior to determination of planning.

Could this be supplied for consideration please? The report is referred to within the Access Statement, but I can't see it on Information @ Work?

Lighting

If there is to be external lighting, a lighting plan must be submitted (demonstrating consideration for nocturnal species such as bat and invertebrate species) for approval in writing prior to determination of planning. The plan must comply with the following guidelines:

<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

Is there any information regarding lighting? NB internal lighting must also comply with the above guidelines.

Enhancements

In accordance with the Environment (Wales) Act 2016, enhancements will be required.

- Integrated bat and bird boxes within the new building (bat box will not be illuminated)
- Hedgehogs – gaps will be created in boundaries (13cm x 13cm) to allow free passage across the site. This includes the fencing associated with the new building.
- Creation of a wildflower area for the benefit of pollinators. Area and seed mix must be specified.
- The Arboricultural report describes mitigation for tree losses in the open space to the west and the north – see page 14. Assuming the scheme is amended to

avoid impacts and therefore loss of the trees, this mitigation for tree loss will still be instigated as an enhancement, rather than a mitigation measure. In contrast to the recommendation within the report, a mix of 5 or more different species will be used that are not currently present onsite, e.g., hornbeam, hazel, beech, silver birch, sessile oak, willow sp.

The enhancement features must be fully specified and added to all relevant plans for the site.

I can't see any reference in the submitted documents to the enhancements set out above.

Landscaping

The 'Site Modifications' drawing (11 October 2021 | TS1428 PA-03) shows '*Swales with biodiversity*', but with no further detail is provided. This detail is required – specifically, an establishment, management and maintenance plan covering at least the first 5-years. NB – all planting will be native species of local (if not, Welsh) provenance.