



Cyfarthfa Retail Park, Merthyr Tydfil

INNS Strategy

BL Merthyr Limited

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	Click to enter a date.			

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1.0 Introduction

1.1 Terms of Reference

- 1.1.1 Wardell Armstrong LLP (part of SLR) was commissioned by BL Merthyr Limited (the 'client') to produce an Invasive Non-Native Species (INNS) Strategy and updates to baseline habitats following a site walkover.
- 1.1.2 The client has been granted planning permission (P/24/0200) for development of an area of land south of Cyfarthfa Retail Park, Merthyr Tydfil, CF48 1HY (hereafter referred to as the 'Site') into a drive through coffee shop.
- 1.1.3 Planning permission has been granted under conditions, including:

Condition 12:

"Before any site clearance works commences on site, a Non-native Invasive Species Strategy shall be submitted to and approved in writing by the Local Planning Authority. The Non-native Invasive Species Strategy shall be fully implemented in accordance with the approved details prior to the commencement of any works.

Reason - To prevent the spread and ensure the eradication of a highly invasive species to accord with Policy EnW4 of the Merthyr Tydfil County Borough Replacement Local Development Plan."

1.2 Scope of Technical Note

- 1.2.1 This technical note details, a) the results of an update UK Habitat (UKHab) walkover completed in September 2025, addressing seasonal limitations and b), an INNS Strategy inclusive of all INNS identified on the site.
- 1.2.2 The aims of the INNS strategy are to, a) reduce the risk of spreading INNS into offsite areas as a result of the works, and b) reduce the risk of INNS reemerging or propagating from adjacent habitat on site following the works.

1.3 Quality Assurance & Environment Management

- 1.3.1 The report has been prepared, reviewed and approved by members of the Chartered Institute of Ecology and Environmental Management (CIEEM), who are bound by its code of professional conduct. British Standard (BS) 42020 and appropriate specialist guidance has also been referenced in the preparation of this report.



2.0 UKHab Baseline – January 2024

- 2.1.1 The 2024 UKHab Survey was undertaken in January which is outside the optimum recommended time for habitat surveys (April to August) and therefore survey data may not be representative of other times of the year. Additionally, at the time of the survey, the vegetation on site had been strimmed to ground level which reduced the ability to identify some plant species on site. However overall, it was possible to identify the broad habitat types within the Site and make an assessment of their likelihood to support ecological receptors.

Habitats

- 2.1.2 The UKHab survey undertaken in January 2024 identified two habitat types on site;
- *g3 – neutral grassland* covered the majority the site, extending from the northwest to the southeast corner;
 - two areas of *h3 - dense scrub*, one near the centre of the site and another in the northeast corner of the site; and,
 - a *u1e – fence* line in the interior of the site, roughly following the margins of the site.

Invasive Non-Native Species

- 2.1.3 Three INNS were identified during the 2024 UKHab survey;
- box honeysuckle *Leycesteria formosa*, identified along the northern site boundary
 - multiple stands buddleia *Buddleja davidii*, identified along the northeast boundary of the site; and,
 - cherry laurel *Prunus laurocerasus*, identified along the northeast boundary of the site.



3.0 UKHab Baseline – September 2025

3.1 Methods

- 3.1.1 The updated site walkover was undertaken by Cassian Wigley, Project Ecologist at SLR on 5th September 2025. For the survey, habitats within the site were either confirmed as still present or absent in comparison to the previous findings in terms of broad habitat category and extent.

3.2 Survey Results

Habitats

- 3.2.1 The update habitat survey identified no significant or substantial changes to the habitat types on site compared to the UKHab survey undertaken in January 2024; however, the area of *h3 – scrub* had significantly increased and the area of *g3 – neutral grassland* had significantly decreased.

Scrub

- 3.2.2 The species present within the *h3 – dense scrub* areas that had extended include young grey alder *Alnus incana* locally dominant in the southwest of the site. Abundant bramble *Rubus fruticosus* agg., frequent dogwood *Cornus sanguinea*, dog-rose *Rosa canina* agg. and rosebay willowherb *Chamerion angustifolium*, occasional hawthorn *Crataegus monogyna*, gorse *Ulex europaeus* and ash *Fraxinus excelsior* was also present throughout. On the ground, wild strawberry *Fragaria vesca*, yarrow *Achillea millefolium* and Yorkshire fog *Holcus lanatus* were abundant, and coltsfoot *Tussilago farfara* was occasional.

Grassland

- 3.2.3 Species present within the *g3 – neutral grassland* remained largely the same as reported in 2024, with the addition of occasional wild carrot *Daucus carota*.

Invasive Non-Native Species

- 3.2.4 Additional INNS were identified in both habitats that had not been recorded during the January 2024 UKHab survey;
- Himalayan honeysuckle *Leycesteria formosa* was identified along the northern boundary of the site;
 - red osier dogwood *Cornus sericea* was also identified along the northern boundary of the site, each of these species could also extend into the *h3 – dense scrub* area, although this was not confirmed due to access being restricted by the dense scrub vegetation; and,
 - endive chicory *Cichorium intybus* was identified within the *g3 – neutral grassland* within the south / southwest part of the site.



4.0 INNS Strategy

4.1 Legislation and Policy

4.1.1 The INNS identified on site are not listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and are therefore not legally regulated; however, the biodiversity duty under Section 6 of the Environment (Wales) Act 2016 requires public authorities in Wales to actively maintain and enhance biodiversity and promote ecosystem resilience when performing their functions, so long as it is consistent with the proper exercise of those functions.

4.1.2 Additionally, Policy EnW4: Environmental Protection of the Merthyr Tydfil County Borough Replacement Local Development Plan states that:

“Development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from either:

- *Pollution of land, surface water, ground water and the air;*
- *Land contamination;*
- *Hazardous substances;*
- *Land stability;*
- *Noise, vibration, dust, odour nuisance and light pollution; or*
- *Any other identified risk to public health and safety.*

Where impacts are identified the Council will require applicants to demonstrate that appropriate measures have been incorporated to reduce, or minimise the impact identified to the lowest possible acceptable level.”

4.1.3 All INNS should therefore be controlled to reduce the risk of their spread into the wider environment thereby maintaining and minimising the impact to biodiversity.

4.2 Distribution of INNS

4.2.1 The locations of the identified INNS on site are shown on Drawing CA13316-002 provided in Appendix 1.

4.2.2 There are multiple small buddleia plants distributed among the scrub (*h3 - dense scrub*) throughout interior of the site and along most of the northern site boundary.

4.2.3 Low numbers of small cherry laurel plants are present along the north-eastern site boundary, and at least one larger plant is located just south of these further within the scrub.

4.2.4 A linear series of small box honeysuckle plants are present along the northern site boundary near the midline of the site.

4.2.5 There is a stand of several mature Himalayan honeysuckle plants are located along the north-eastern site boundary.

4.2.6 A large stand of red osier dogwood comprising multiple plants is located along the north-eastern boundary of the site.

4.2.7 Multiple endive chicory plants are distributed within the grassland (*g3 – neutral grassland*) area south of the scrub.



4.3 Approach of INNS Strategy

- 4.3.1 Buddleia has been highlighted as having the greatest invasive potential as it has been identified site-wide with the highest frequency on site. It is well understood that buddleia has potential to spread widely through seed dispersal, especially into areas of disturbed ground, and asexually via propagation of arisings such as roots, stems and branches in contaminated earth.
- 4.3.2 Endive chicory, red osier dogwood, Himalayan honeysuckle, box honeysuckle and cherry laurel share these traits but to a lesser degree, as they have been identified at much lower frequencies on site and are also considered less prolific.
- 4.3.3 Published research on the invasive biology of buddleia¹ and guidelines on the management of buddleia^{2, 3} have been used to inform the INNS strategy for the most part. The approach is to manage each of the INNS to the same standard.

4.4 Description of Works

- 4.4.1 WA (part of SLR) understands that the entire site will be cleared of vegetation and soil stripped to facilitate the planned development. This will include the removal and correct disposal of INNS identified on site.

4.5 Removal of INNS

- 4.5.1 Each INNS plant will be identified by a supervising Ecological Clerk of Works (ECoW) as the works progresses through the site.
- 4.5.2 Non INNS vegetation will be removed first, arisings stored and processed as though they are contaminated as a precautionary measure, as described in Section 4.7.
- 4.5.3 INNS individual plants will be removed as follows and in line with advice provided by the ECoW on site.
- 4.5.4 Larger plants such as buddleia, red osier dogwood, Himalayan honeysuckle and larger a cherry laurel will be hand cut as close to the primary stem/s as practical to expose the point from where it exits the ground.
- 4.5.5 Arisings will be collected on pre-laid tarpaulin sheet or directly into a sealed container such as a skip, whichever is practical. If necessary, arising will be transported across site wrapped in tarpaulin to be stored in a sealed container such as a skip ahead of processing (Section 4.7).
- 4.5.6 Once the initial arisings have been removed from the area, the ground surrounding each INNS plant stem will be excavated to expose and remove as much of root system as possible. Hand tools will be sufficient for the INNS identified on site although mechanical such as small plant vehicles will be required should a substantial root system be uncovered. Roots should be treated in the same way as arisings.

¹ Tallent-Halsell, N.G. and Watt, M.S., 2009. The invasive *Buddleja davidii* (butterfly bush). *Botanical Review*, **75**(3), pp.292–325. <https://doi.org/10.1007/s12229-009-9033-0>[1]

² Property Care Association. (2018). *Practical management of invasive non-native weeds in Britain and Ireland*. Property Care Association. Available at: <https://www.property-care.org/resources/manual-practical-management-of-invasive-non-native-weeds-in-britain-and-ireland> [Accessed 5 Sep. 2025].

³ National Roads Authority. (2010). *Management of noxious weeds and non-native invasive plant species on national road schemes* (Rev. 1). Transport Infrastructure Ireland. Available at: <https://www.tii.ie/media/rtmi2ebi/management-of-noxious-weeds-and-non-native-invasive-plant-species-on-national-road-schemes.pdf> [Accessed 9 Sep. 2025]



- 4.5.7 Smaller INNS plants identified on site, box honeysuckle, small cherry laurel plants and endive chicory can be hand pulled if the ground is loose and / or moist enough. The use of a garden fork will be used to facilitate this process by loosening of the soil at the base of these plants. All arisings and root material should be transported across site, stored and processed as described above.

4.6 Control of INNS

- 4.6.1 Soil stripping of the site will be completed shortly after removal of INNS. Stripped soils will be stored and processed, see Section 4.7.
- 4.6.2 High-density woven polypropylene or non-woven polypropylene 'anti weed' fabric will be installed across the entire site to suppress an INNS emergence from the soil on site or spread adjacent from offsite until such a time as the development can commence.

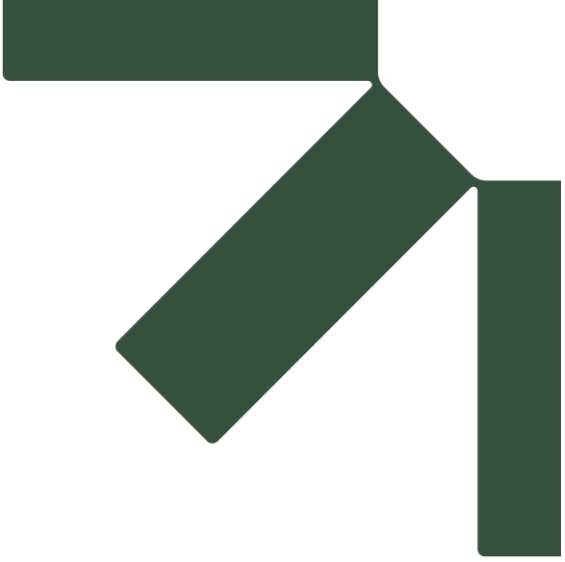
4.7 Processing Contaminants

- 4.7.1 All arisings, roots and contaminated soil will be stored on site in a water and light sealed container such as a skip until it is collected by an appropriate waste disposal company.

4.8 Biosecurity Protocol

- 4.8.1 To avoid cross contamination into off-site areas, the following biosecurity protocol will be implemented.
- 4.8.2 Before leaving site;
- all site vehicles will be cleaned, in particular tires and wheel arches that could have picked up soil will be thoroughly washed;
 - boots of all site personnel and contractors will be washed and picked clean of any potentially contaminated soil; and,
 - clothing will be brushed down to remove any potential seeds or arisings of INNS.





Appendix 1 UKHab Baseline Map (CA13316-002)

Cyfarthfa Retail Park, Merthyr Tydfil

INNS Strategy

BL Merthyr Limited

SLR Project No.: 407.V13316.00WA1

12 September 2025



- KEY**
- Planning Boundary
 - g3 neutral grassland
 - h3 dense scrub
 - u1e Fence
 - Box Honeysuckle
 - Buddleia (throughout h3)
 - Cherry Laurel
 - Himalayan honeysuckle
 - Endive chicory (throughout south / southwest g3)
 - Red osier dogwood

Secondary Codes

10 Scattered scrub
525 Invasive Non-native species:
612 Fence

Notes:

Boundaries are indicative. Aerial imagery shown for context purposes only.

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A	FIRST ISSUE	12/09/25	BL	CW	SC
REVISION	DETAILS	DATE	DRAWN	CHKD	APPD

CLIENT

BL MERTHYR LIMITED

PROJECT

CYFARTHFA RETAIL PARK

DRAWING TITLE

UKHAB PLAN – SEPTEMBER 2025

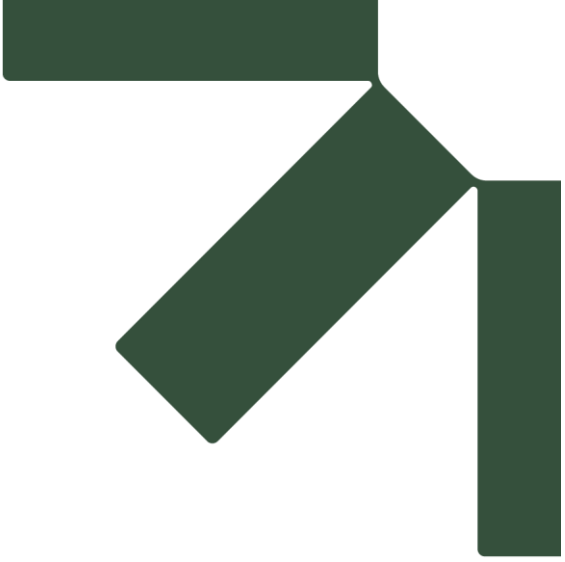
DRG No.	CA13316-002	REV	A	SUIT. CODE	--
DRG SIZE	A3	SCALE	1:250	DATE	12/09/2025
DRAWN BY	BL	CHECKED BY	CW	APPROVED BY	SC



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Appendix 2 Buddleia Identification Sheet

Cyfarthfa Retail Park, Merthyr Tydfil

INNS Strategy

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SLR Project No.: 407.V13316.00WA1

12 September 2025

Buddleia

Species Description

Scientific name: *Buddleia davidii*

AKA: Buddleja, Butterfly Bush

Native to: Central and South-western China

Habitat: Grows in a wide diversity of habitats, but most commonly found along riversides and urban infrastructure e.g. buildings, railroad tracks, etc.

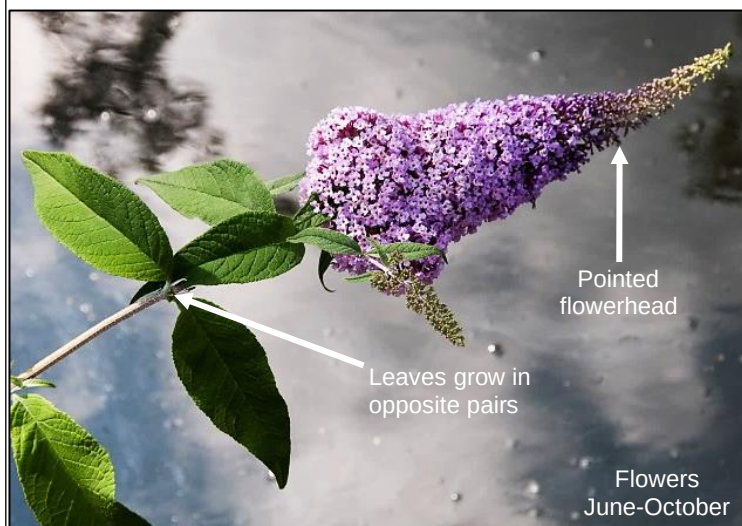
Buddleia is an evergreen perennial shrub growing to a maximum height of five metres. Introduced into UK cultivation in 1896 as an attractive ornamental due to its many small, densely packed lilac/purple flowers, it has since become a favourite among gardeners, horticulturalists and public officials owing to its strongly sweet-scented flowers and its popularity with butterflies.

The plants' benefits for invertebrates (particularly butterflies) are notable, although its wider effects on both society and the environment should not be overlooked. The most prominent environmental impact is its ability to outcompete all native vegetation in a given locale, often resulting in monotypic stands that contain little (if any) floral diversity. Economic and social costs of Buddleia include the extensive damage inflicted to historic buildings as caused by the plants' capacity for growing in crevices and weakening the stonework. Railway tracks are also threatened by the shrubs' encroaching tendencies.

With few natural controls in the UK, and an ability to produce three million seeds per year, Buddleia can rapidly spread throughout the countryside, including areas of significant ecological importance. These incursions lower both the human amenity and wildlife values of invaded areas by outcompeting, and potentially eradicating, native fauna and flora, drastically reducing the overall biodiversity.



Key ID Features



Identification throughout the Year

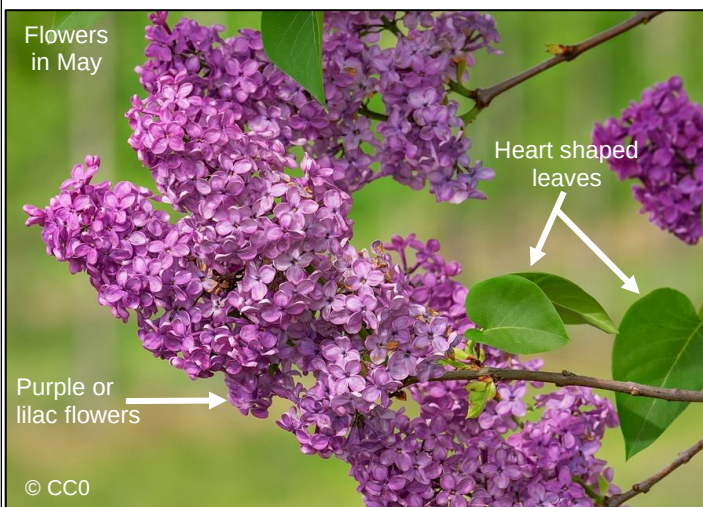
Buddleia is readily identified throughout the year, yet is most easily recognisable between June and October when in flower. During this period, it is a favourite among butterflies and other pollinating insects and can often be seen hosting swarms of these invertebrates. From September to December the plant fruits, with the flowerhead appearing as a mass of seed pods. The bark has a distinctive ridged texture year-round.



Similar Species

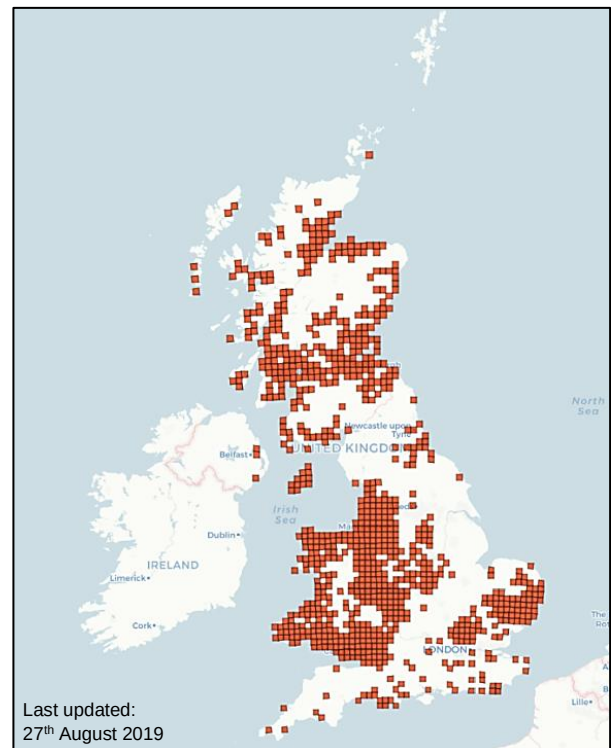
Lilac (*Syringa vulgaris*)
[Non-native]

Within the UK there are few plants which could be confused with Buddleia. The Lilac Tree however is an exception, as its flowers are similar in both appearance and colour. The most distinguishing characteristic of the lilac tree is its heart shaped leaves which are both smaller and rounder compared to those of Buddleia. Further differences include the Lilac Tree growing to a taller height of seven metres and an earlier flowering period, typically lasting throughout May.



Distribution

Buddleia is a common plant found throughout the UK and although it appears largely absent in the eastern and southwestern counties, it is likely underreported.

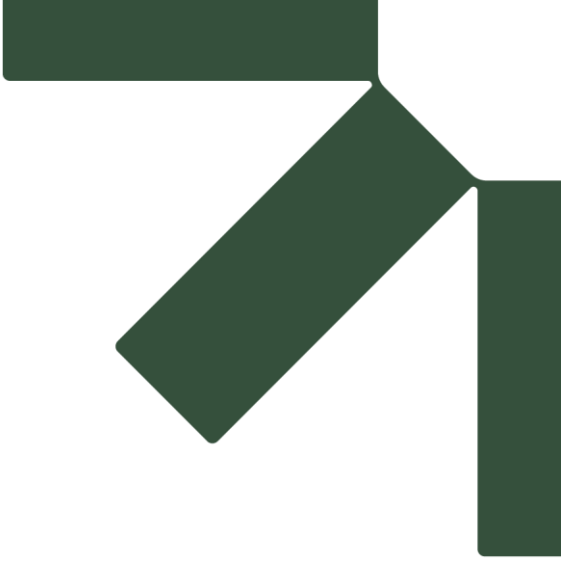


References and Further Reading:

Global Invasive Species Database (2018) *Species profile: Buddleja davidii*. Available at: <http://www.iucngisd.org/gisd/species.php?sc=650> (Accessed: 05th May 2019).

Squirrell, J. (2016) *Buddleia, Buddleja davidii*. Available at: <http://www.nonnativespecies.org/factsheet/downloadFactsheet.cfm?speciesId=581> (Accessed: 05th May 2019).

Streeter, D. (2009) *Collins flower guide : the most complete guide to the flowers of Britain & Europe*. London: Collins.



Appendix 3 Photographs of INNS on site

Cyfarthfa Retail Park, Merthyr Tydfil

INNS Strategy

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INNS	Photographs
Endive chicory	
Box honeysuckle	

INNS	Photographs
Red osier dogwood	
Cherry laurel	

INNS	Photographs
Buddleia	
Himalayan honeysuckle	



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