

INTERNAL MEMORANDUM

To: David Cross
From: Ecologist/Countryside Officer
Ask for: Matt Davies
Ext: 5278
Memo #: 2

Date: 8th November 2019

SUBJECT: P/19/0235 LAND TO REAR OF 9-15 NEWTON STREET, ABERCANAID, MERTHYR TYDFIL

[Proposed detached dwelling, double garage and barn]

A Preliminary Ecological Appraisal (PEA) of the site was undertaken in late September 2019 and a report submitted for consideration.

The survey results and report do not give enough detail regarding the onsite habitats and features, especially given the location of the proposed development site (entirely within the Afon Taf SINC).

There is insufficient detail for full assessment of the impact of the proposed development of onsite habitats and species.

Habitats

The habitat in the centre of the site is clearly grassland habitat with patches of willowherb other areas of dock (indicating local nutrient enrichment of the soil). There are no grass species identified within the report. More detail is required in order to identify the type of grassland present. Were any rush or sedge species present?

I would expect a much more extensive species list to be provided for the site.

The most recent aerial images of the site show what appears to be a large brash pile and a wall near the western site boundary. Neither have been mentioned or described in the report. There are no photographs of these features.

Generally, the photographs within the report are of low quality and are unclear.

The PEA plan is inadequate – there are large unmapped areas (what is the habitat in these areas?) – there is no site boundary – the wall is not mapped – there are no target notes (e.g., for suitable reptile habitat, Japanese knotweed, large brash pile etc).

The report concludes that the site ‘... *does not appear to support any of the habitat types that the SINC is designated for.*’ However, the report identifies for example, tall ruderal habitat, scrub habitat, a stream ... all habitat features in the description for the SINC.

In addition, the report states that ‘... *it is unlikely that there will be an impact on the SINC.*’

The development will clearly have a general impact on the onsite habitat, but also on the habitat types for which the SINC is designated.

Nearby protected sites

There is a SSSI within 2km of the site (not identified within the report). There are a number of SINC sites within the search area listed within the report. No information is provided regarding the distance these are away from the site, what their main features are and there is no interpretation or conclusion regarding whether the development will impact upon them.

Protected Species Records

808 records returned – were these ‘all’ records or just those from the last 10 years?

Badger – there is adjacent woodland, mature hedgerow and onsite grassland habitat that are suitable for commuting and foraging badger. Although there are no records, it is possible that badgers use the site and possible that there may be a nearby sett (within woodland or scrub). There is also plenty of habitat onsite that might be used by badgers to form a couch to lie-up above ground during the night between foraging sessions. In addition, at during the summer badgers often sleep in day nests above ground.

Invertebrates – this seems a low amount of species for 2km surrounding the site. Is this correct? There are larval foodplants for invertebrate species found within the onsite species list as it stands. The impact of the development on invertebrates should therefore be fully considered within the report.

Common dormouse – dormice have been known to create nests in scrub and even in tall ruderal habitat. Further consideration for dormice should be included within the report with guidance on how to remove habitat with consideration for this species.

PHASE 1 HABITAT SURVEY

Summary

Further habitats, e.g., grassland should be added in when identified.

There is also suitable habitat for common dormouse, badger and invertebrates.

Bats

No mention of the impact of loss of habitat on foraging bats.

Reptiles

This section advocates ‘... *pushing animals into safe and / or retained areas of suitable habitat.*’ Where are the suitable areas that the reptiles will be encouraged towards?

Breeding birds

Are there schedule 1 birds in the records?

Other features

Brash pile?

Wall (is this suitable for hibernating reptiles?)?

Recommendations

This section mentions EPS – an explanation of which EPS could be found and where may help here.

Reptile method statement

I find this doesn't read well. It really needs to be re-written and made more concise and clear – a timetable of events would help to describe what will be done and when. The 3-phase vegetation cut needs a period 24 hours between each cut.

Mitigation / compensation / enhancement

The loss of habitat onsite will also require compensation. I would suggest meadow-style green roofs, ideally on all proposed onsite buildings, but at least installed on the workshop and the garage buildings. This would go some way to redressing the balance in terms of compensation and also provide enhancement of the site.

The development should be fenced-off to prevent human access and impacts to the rest of the SINC site following the development. However, access for reptiles and hedgehog should be provided.

Other enhancement measures might include, supplementary planting for any gaps within the surrounding hedgerows, the establishment of a pond, an otter holt – offsite, within the woodland to the east.

The report talks about impacts on the Nant Canaid ('... *a possibility of an indirect impact on the SINC as a result of a pollution incident, e.g., sediment in the stream on the site's north western boundary.*'). I would suggest a dedicated CEMP (Construction Environmental Management Plan) is needed, to minimise any risks, not only to water quality and therefore otter populations, but also to other onsite habitats and species.

The following should be added into the mitigation measures section. 'Any trenches, holes, exposed pipes will be covered over at night or a means of escaping provided (e.g., a plank set at 30°).'

The suggested 5m buffer suggested between the watercourses and the development footprint must be increased to 7m - measured from the top of the southernmost bank of the Nant Canaid.

There will be no lighting of the buffer and no lighting of any of the boundary habitat. Any lighting associated with the buildings will conform to the following guidance:

(2018) Guidance Note 08/18. Bats and artificial lighting in the UK: *Bats and the Built Environment* series. Bat Conservation Trust and Institute of Lighting Professionals.

<https://cdn.bats.org.uk/pdf/Resources/ilp-guidance-note-8-bats-and-artificial-lighting-compressed.pdf?mtime=20181113114229>

Are there plans to landscape the areas outwith the construction footprint? Any planting onsite will be native species of local provenance. Habitats must be retained wherever possible and clearance minimised.

The driveway will be created from ground reinforcement grass grid material.

The patio area seems overly large (especially in combination with the decked area) and should be reduced. It will be constructed from permeable slabs.