

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 1

Date of previous memo: -

Date: 01/11/2021

SUBJECT: P/21/0358 | Residential development and associated engineering, access and landscaping works | Land Off Elm Tree Grove Twynyrodyn Merthyr Tydfil

Reports detailing onsite survey work undertaken in 2019 have been submitted in support of the above application. All survey work (and therefore biological data) is out of date (see Table 1 below).

Table 1 – age of survey data.

Survey	Date of Survey	Approximate age of survey data on 29 th October 2021
Preliminary Ecological Assessment (PEA)	January 2019	2 years, 10 months (assuming work was undertaken at the start of January – no definite date in report)
Reptile Survey	12 th June 2019 (NB last date of survey)	2 years, 4.5 months
Invertebrate Survey	27 th July 2019 (NB last date of survey)	2 years, 3 months
Bat Activity Survey	21 st July 2019 (NB last date of survey)	2 years, 3 months

The recommendations set out within the following advice note will be followed:

Box 1

CIEEM Advice note. On the Lifespan of Ecological Reports & Surveys. April 2019.

This document states the following for survey data that is between 18 months and 3 years old:

A professional ecologist will need to undertake a site visit and may also need to update desk study information (effectively updating the Preliminary Ecological Appraisal) and then review the validity of the report, based on the factors listed below. Some or all of the other ecological surveys may need to be updated. The professional ecologist will need to issue a clear statement, with appropriate justification, on:

- The validity of the report;
- Which, if any, of the surveys need to be updated; and
- The appropriate scope, timing and methods for the update survey(s).

NB – up-to-date ecological data will be required. Aderyn data search from SEWBReC (Package C 2km).

Specific comments regarding the individual existing reports:

Table 2: PEA

Page 5	Information regarding nearby designated sites requires amendment. Up-to-date Aderyn search will provide accurate data. Please also check this in all other ecological reports for this site.
Page 6	Reference to CIEEM Guidelines for EclA Assessment out-of-date (latest update September 2019)
Page 7	Limitations point to sub-optimal survey period for id of plant species. NB as further daytime survey work was undertaken subsequent to the PEA (i.e., reptile survey and invertebrate survey). This provided ample opportunity to assess the site in a more optimal period up until the end of July. The survey visit to update the survey work should therefore be undertaken in at a more optimal time for plant id.
Page 15	Statement regarding nationally designated sites within a 2km radius is incorrect.
Page 18	The habitat has been assessed as suitable for bat foraging and commuting and bat activity surveys are recommended. The habitat has not been assigned a level of suitability (Low, Moderate or High) as per BCT Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins 2016). This site appears to have at least Moderate suitability in terms of bat commuting and foraging habitats (<i>‘Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.’</i>).
Page 7	Is there more information about the anthills? Where exactly are they? Can their age be estimated based on their size?
General	No mention of fungi or lichens in the report. For example, are there suitable areas for waxcaps?

Does the data in these reports appear in the records search??

Table 3: Reptile Survey

General	Following any updates that may be required following the review (Box 1), a Reptile Mitigation Strategy for the site will be required for review and approval prior to determination.
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Table 4: Invertebrate Survey

General	No interpretation in the report regarding the impact of the scheme on invertebrates. In addition, no mitigation, compensation or enhancement measures are recommended. These are all required.
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Table 5: Bat Activity Survey

Page 6	Legal status: out-of-date reference to Conservation of Habitats and Species Regulations. Please amend.
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General

The onsite habitat has not been assigned a level of suitability (Low, Moderate or High) as per BCT Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins 2016). As referred to in Table 2, the site appears to have at least Moderate suitability in terms of bat commuting and foraging habitats. Survey effort for habitat of Moderate suitability (from Collins 2016) is highlighted below:

Table 8.3 Guidelines on the number of bat activity surveys recommended to achieve a reasonable survey effort in relation to habitat suitability.			
Survey type	Low suitability habitat for bats ^a	Moderate suitability habitat for bats	High suitability habitat for bats
Transect/spot count/timed search surveys	One survey visit ^b per season (spring – April/May, summer – June/July/August, autumn – September/October) ^c in appropriate weather conditions for bats Further surveys may be required if these survey visits reveal higher levels of bat activity than predicted by habitat alone	One survey visit ^b per month (April to October) ^c in appropriate weather conditions for bats. At least one of the surveys should comprise dusk and pre-dawn (or dusk to dawn) within one 24-hour period.	Up to two survey visits ^b per month (April to October) ^c in appropriate weather conditions for bats. At least one of the surveys should comprise dusk and pre-dawn (or dusk to dawn) within one 24-hour period.
AND			
Automated/static bat detector surveys ^d	One location per transect, data to be collected on five consecutive nights per season (spring – April/May, summer – June/July/August, autumn – September/October) ^c in appropriate weather conditions for bats	Two locations per transect, data to be collected on five consecutive nights per month (April to October) ^c in appropriate weather conditions for bats	Three locations per transect, data to be collected on five consecutive nights per month (April to October) ^c in appropriate weather conditions for bats

Further survey effort is therefore required.

NB recent research has indicated that collecting data from static bat detector surveys over 5 consecutive nights is likely only to detect common species of bat (Richardson et al, 2019¹). I would therefore like to see data for 10 consecutive nights to give the results of the surveys more weight.

NB records of, *for example*, reptile, invertebrate and bat species identified on or close to the site during the 2019 surveys have not yet been passed on to SEWBRc. All data should be passed submitted.

¹ Richardson, S.M., Lintott, P.R., Hosken, D.J and Mathews, F. (2019). An evidence-based approach to specifying survey effort in ecological assessments of bat activity. *Biological Conservation* 231 (2019) 98-102.