

INTERNAL MEMORANDUM

To: Adam Foote
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 3
Date of previous memo: 12/12/2023
Date: 18/03/2024

SUBJECT: P/23/0208 | Construction of mountain bike trails, access trails and uplift track extension and amendments. | Gethin Woodland Centre A470 Pentrebach To Rhydycar Northbound Abercanaid Merthyr Tydfil CF48 1YZ

Documents submitted in support of the application:

1. Landscape and Ecological Management Plan – Bike Park Wales Trail and Access Track Construction.
2. Construction Environmental Management Plan – Bike Park Wales Trail and Access Track Construction.
3. Bike Park Wales Future Forest Vision (Management Plan). Bike Park Wales and Natural Resources Wales.

COMMENTS

Document 1 (LEMP):

- There are no details regarding, for example, the author, their qualifications, version or the date of the document. This information is required?
- The LEMP needs a plan showing the mountain bike trail network and uplift tracks and 'core area' of the woodland in the context of the wider area management.
- There are still concerns regarding the bike trails running through ASNW, which have been replayed to Natural Resources Wales (NRW). NRW have not subsequently raised any concerns.
- When the document refers to wider land management, is this relating to the 'core area' or areas beyond this?
- If the change in management of the core area forms part of the enhancement measures for the application then is this not also material to the application?
- Measures the tenant/developer will undertake – how will these measures be monitored?

- Dangerous trees – not all dangerous trees will need to be completely felled. The risk and danger can sometimes be removed, but cutting major limbs and leaving the trunk in situ as a monolith or standing deadwood.
- Who will manage the mountain bike trail network and uplift tracks and the core area? How will management works be funded? How long will the FFV be in place? 33 year lease, from when until when? Who is ultimately responsible?
- Who will be responsible for water management on the trails – BPW? Will the details of the monthly inspections (for water management and hazardous trees and vegetation growth) be provided to NRW and MTCBC?

Document 2 (CEMP):

- There are no details regarding, for example, the author, their qualifications, version or the date of the document. This information is required?
- The document needs a plan showing:
 - the mountain bike trail network and uplift tracks;
 - the preliminary schedule of trail and track construction;
 - the buffer zones.
- There needs to be a full timetable of works.
- Environmental Aspects and Impacts Register. Will the information in the register be reported back to MTCBC?
- Details of site clearance – a relatively small number of mature conifer trees required to be felled. How many? Where are they? What about trees that will remain – root protection zones etc? How will nearby trees be protected – has there been input from an arboriculturalist? Where are the trees to remain that will need protection? So, definitely no broadleaved trees to be removed? What about suitability for roosting bats – has this been investigated?
- Details of bird nesting checks need to be reported to MTCBC.
- Has the presence of dormice been considered?
- Reptiles – what happens if reptiles are encountered?
- Does this scheme need a SAB?
- Who else would normally be consulted regarding the CEMP? Water engineers?
- *All working areas should be maintained to the narrowest possible width?* This should say 'must' or 'will' rather than *should*.
- *The trails will be engineered to avoid areas of particular botanical interest* – how will this be ascertained?

- How wide are the tracks being proposed? What will be the working area outside of this? What about access routes for vehicles and other plant? Where will the site compound be?
- What about re-instatement of the verges? What will this entail? Is this to be left as natural regeneration? Would planting speed up regeneration to encourage stabilisation and avoid erosion?
- Dangerous trees - – not all dangerous trees will need to be completely felled. The risk and danger can sometimes be removed, but cutting major limbs and leaving the trunk in situ as a monolith or standing deadwood.
- ASNW. Much more detail is required here. What trees might be impacted along the routes running through the ASNW area? Has the route and the impacts on trees been assessed by an arboriculturalist? Where will the RPZs be, not just in terms of the track positions, but also the access routes for vehicles and other plant?
- Ecological supervision will be required for works that could impact great crested newt.
- *Planting of tussocky (or encouraging) species* – details required of the species proposed.
- Will there be reporting of inspections to MTCBC and/or NRW?
- Wildlife Protection Zones? Where will these be? Are they marked on a plan?

Document 3 (FFVMP)

- This document is in DRAFT form. Has NRW signed it off?
- *This allows the core area to be managed with primacy given to the bike park which should be at the heart of all decisions.*

Should not primacy be given to management of the woodland in order to, for example, maintain and enhance biodiversity, whilst at the same time facilitating the needs of BPW as far as possible?
- The document needs a plan showing the Minimum Intervention Areas.
- Can the results of the Annual Review be reported to MTCBC?
- Biodiversity Management Plan – is this available?
- Water Management Plan – is this available? This is also relevant – even at a small scale in relation to the trails and uplift tracks?
- Future Resource Plan (FRP) – can this be provided?
- Natural designations – should this not include SINC?
- Pie charts on page 14 – not labelled properly – no key/legend.

- Broadleaves referred to, but no statement regarding native species of local provenance.
- *Specific areas zoned to be managed for biodiversity?* What/where are these?
- *Evidence of species diversity will be recorded annually and evidenced by SLO?* Will the details of this recording be made available to MTCBC?
- *Existing broadleaved woodland will be used as hubs for expansion of native woodland identified east of woodland?* It would be useful if this was shown on a map?
- *... the long-term objective of expanding and connecting the native woodland area and riparian zones.* Again, it might be nice to see a plan that illustrates this long term objective?
- *Potential ASNW restoration currently identified equates to 0.22Ha, which will offset the lost ASNW in the Development of the Bike Park Wales Masterplan.* What is the area of the lost ASNW? Is this due to the proposed works in P/23/0208?
- Management of rides – broad aims, but no real detail – no plan of where the rides are, no timetable for the management measures.
- Management of ponds – again, broad aims, but no details
- Management of Open Spaces – refers to Plan XX? – broad aims, but no real detail – no plan of where the open spaces are, no timetable for the management measures.
- Management of walls? – has the presence of protected species been considered here, e.g., reptiles, amphibians, birds, bats?
- Management of other species – what other species? More detail would be welcome/
- Maintenance of rides – *flailed every 2-3 years* – what time of year?
- *20 YEAR CORE AREA PLAN table*
 - Series of tasks on and when they will be undertaken within 4 yearly intervals – so quite broad with little detail.
 - First column labelled 'Cpt'? What does this stand for? Specific things included in this column – e.g., 1015a/c – what does this refer to? Also, Masterplan – is this available?
- *IMPLEMENTATION OF 5 YEAR PLAN table*
 - First column labelled 'Cpt'? What does this stand for? Specific things included in this column – e.g., 1016g – what does this refer to? Again, Masterplan – is this available?

- Other references to Accommodation Masterplan and Trails Masterplan. Does this mean more accommodation and trails are planned?
- Yearly series of operations and who is responsible – no timetable (aside from the year). No associated plan?
- Examples of insect and mammalian pests provided, but no real actions proposed?
- Is there an INNS – method statement to prevent spread?
- Natural Reserve – where will this be – plan?
- Supporting plans – some of the plans supplied by NRW do not have keys/legends. It is not clear how these supporting plans compliment the text of this document.

Planning Policy Wales 12 (PPW 12)

The commissioned ecologist must take new Planning Policy Wales (PPW 12), Chapter 6 into account where relevant to this application.

The main changes to policy (that are or may be relevant to this application) are as follows:

Green Infrastructure: *stronger emphasis on taking a proactive approach to green infrastructure, the submission of a proportionate green infrastructure statement with planning applications and signposting Building with Nature standards.*

Net Benefit for Biodiversity and the Step-wise Approach: *further clarity is provided on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and, the need to consider enhancement and long-term management at each step. The use of the green infrastructure statement as a means of demonstrating the stepwise approach is made explicit. A simplified diagram of the policy approach has been developed (which will be further refined in the consolidated version of PPW12). The importance of strategic collaboration to identify and capture larger scale opportunities for securing a net benefit for biodiversity is recognised.*

Protection for Sites of Special Scientific Interest: *strengthened approach to the protection of SSSIs, with increased clarity on the position for site management and exemptions for minor development necessary to maintain a 'living landscape'. Other development is considered unacceptable as a matter of principle. Exceptionally, a planned approach may be appropriate where necessary safeguards can be secured through a development plan*

Trees and Woodlands: *closer alignment with the stepwise approach, along with promoting new planting as part of development based on securing the right tree in the right place.*
