

INTERNAL MEMORANDUM

To: Adam Foote
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1
Date of previous memo: -
Date: 16/05/2024

SUBJECT: P/24/0032 | Discharge of conditions 2 (details of proposed soft landscaping works) and 4 (landscape management plan) of planning consent P/23/0125. | Quakers Yard Railway Station Treharris CF46 5NJ

Documents submitted in support of the above application:

1. Series 3000 Specification. Quakers Yard. CODWBD15EMER / -AMEY-ELS-XX-SP-001 / P01. Dated: 19/01/2024
2. Quakers Yard Location Plan & Planting Schedules. Drawing No: CODWBD15EMER-AMEY-ELS-XX-DR-LL-001. Rev: 01. Dated 02/02/24
3. Landscape Management and Maintenance Plan for Quakers Yard Footbridge. Report number: CODWBD15EMER-AMEY-00-XX-LX-RP-0001 /P01. Dated 06/02/24
4. Quakers Yard Landscape Plan. Drawing No: CODWBD15EMER-AMEY-ELS-XX-DR-LL-002. Rev: 01. Dated 02/02/24

COMMENTS

Non-Native Species

Documents 1-4 above all include the following species: Japanese Rose. *Rosa rugosa*. This is an Invasive Non-Native Species (INNS) found on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

This species must either be removed or replaced with a native species of local (if not Welsh or UK) provenance. This change must occur in Documents 1-4 above and also in any and all other documents where it may be included.

Document 4 includes a reference to the nativar *Salix caprea* 'Kilmarnock'. This must be replaced with *Salix caprea*.

Herbicide Use

Document 1 includes many references to the use of herbicides. This is not acceptable.

Chemical intervention must ONLY be used for the control of INNS (included in Schedule 9 of the Wildlife and Countryside Act 1981, as amended) and then only when no other

method can be employed. For example, Himalayan Balsam can be effectively be controlled by hand pulling before plants have flowered and set seed.

Appendix 30/7 Grass and Wildflower, Action number 8, page 24 refers to Ragwort. Is there a risk of grazing animals in these areas? If not, this is not an issue and in fact ragwort is the main larval food plant of the cinnabar moth, a living organism of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales (Section 7 of the Environment (Wales) Act 2016).

Clarity of Text

Document 3:

- the text seems to be missing the letter 'i' in many places. This makes it quite difficult to read.
- the text in the tables right at the end of the document is blurry and cannot be read.

Please rectify.

Bat and Bird Boxes

Document 4 refers to bird and bat boxes – specification/model information required with hyperlink. NB these must be constructed from woodstone or woodcrete for reasons of longevity.

Control of Rabbits:

Section 4 of the Animal Welfare Act 2006 should be referred to within Document 1.

Contradictory Information

Some of the information in Document 1, between actions is contradictory. For example:

Document 1, Appendix 30/7 Grass and Wildflower, Action numbers 2 and 6, pages 23 and 24.

Action 2 (p23)

Grassed areas shall be cut to the following heights:

*For Verges – **Do not cut from 1st May to 1st October** inclusive to allow for flowering period. Then regular cuts to 50mm height.*

All other grass and wildflower mixes:

Year 1:

- *In the first spring following sowing cut to a height of 50mm and remove arisings.*
- *In September once flowering is over cut again to 50mm. Leave arisings in-situ for 3-5 days and then remove.*

Year 2 onwards:

Cut annually in September once flowering is over to 30mm. Leave arisings in-situ for several days and then remove.

Action 6 (p24)

Grass verges cutting requirements shall be as follows or as otherwise stated in Appendix 30/7:

- a) *First Cut after Winter/Spring. The areas shall be cut when the grass reaches a height of 100 – 150 mm to a height between 50 – 75 mm and the cuttings removed off Site.*
- b) *Subsequent Cuts. **The areas shall be cut** to a height between 50 – 75 mm **at least 3 times per year during the growing season** and the cuttings evenly dispersed.*
- c) *Grassed areas within visibility splays and verges should be cut to a height of 25-40mm;*
- d) *Where there are footpaths remote from the carriageway edge where grass between the road and footpath receives a low frequency cut, the outside edge of the footpath shall be subject to the same regime for a width of 1m.*
- e) *Additional selective cuts shall be undertaken as necessary to maintain visibility. The areas subject to additional selective cuts shall be extended beyond the minimum area required to maintain visibility in order that they appear naturalistic with smoothly curving edges, avoiding straight lines and abrupt angles.*

Actions 2 and 6 are contradictory – for one example, see sections highlighting in **bold** for comparison.

In addition, there are also contradictions and inconsistencies between the information in Document 1 (as above) and Document 3 – see below:

Document 3, page 17:

*Establishment Period Years 0-1 (0-12 months) Cut down to 70-100mm from **mid-July to early September**. Remove arisings. If possible lightly mow the sward down to 70-100mm as required throughout the winter months until March*

*Maintenance Period Years 1-10 (12-120 months) Cut down to 70-100mm **from mid-July to early September**. Remove arisings. If possible lightly mow the sward down to 70-100mm as required throughout the winter months until March. Performance Indicator and End Target at Year 10 - Wildflower areas shall have good, well knitted sward without obvious bare patches.*

The information when compared within and between documents must be consistent. NB the above just constitute some examples, but all information must be consistent. Amendments will be required.

NB the text in bold is highlighted by way of an example, but there are other inconsistencies present.

A further point – devil's bit scabious is included in the seed mix and this species flowers and sets seed quite late in the season, therefore cuts should be avoided until mid-October at the earliest.

Information presented in Documents 1 and 3 must be consistent. Only then can a full evaluation of the content be undertaken.