

INTERNAL MEMORANDUM

To: Caroline Pulley
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1
Date of previous memo: -
Date: 07/09/2022

SUBJECT: P/22/0215 | Erection of a dwelling | Land Off Cardiff Road A4054 And To The North Of 21 Mount Pleasant Cardiff Road Merthyr Vale

Ecological report submitted in support of the above application:

- Preliminary Ecological Appraisal and Preliminary Roost Assessment Survey. Land at Oakfields, Merthyr Vale, Merthyr Tydfil, South Glamorgan, CF48 8TA. Arbtech Consulting Ltd. Final. Issue 2

Comments:

Age of the report

NB at 18 months old, the age of this ecological report is currently acceptable, but on the cusp of being out-of-date¹.

Cover page

Missing information within the table (names, dates). Please could this be added?

Page 9

1.4 Project Description – ‘*The development proposals are for the substantial restoration of a farmhouse and outbuildings. A planning application is being considered by Carmarthenshire County Council.*’

Please can this be amended?

Biodiversity data

No biodiversity data purchased? This was requested at the Pre-App Enquiry stage. Omission of the data has not agreed with the LPA ecologist prior to submission of the report. There may be data within the records that could provide information needed to inform the assessment. Hypothetically, the stable block assessed within the above report as having negligible suitability for roosting bats could be highlighted within the records as a night roost. The general point being that without reviewing the data, it is very difficult to demonstrate that a data search would not have provided relevant information². Data should either be supplied, analysed and interpreted within the report or a full and more robust justification as to why it is not required should be offered for consideration.

Locally Designated Sites, page 13

¹ Advice Note. On the Lifespan of Ecological Reports and Surveys. CIEEM. April 2019

² Guidelines for accessing, using and sharing biodiversity data in the UK. CIEEM. March 2020

The redline boundary for the application is found immediately adjacent to the Merthyr Vale SINC, this SINC site is referred to, but there is no information presented regarding any other nearby locally designated sites (for example, there are at least 3 SINC's within 500m of the site). See page 9 (*'The desk study included a 2km radius review of statutory and non-statutory designated sites'*).

Bats

The stable block is assessed within the above report as having negligible suitability for roosting bats. Does this include night roosting bats? There may be some suitability for this type of roost. However, this is possibly a moot point as it seems to be the case that the stable block is proposed to remain post-development.

Reptiles

A presence or likely absence survey for reptiles is required prior to planning determination.

Invertebrates

More interpretation regarding what impacts the scheme may have on invertebrates.

Lighting

Is onsite lighting proposed? If so, the negative impacts of lighting on site need to be addressed.

Redline boundary

The report encompasses the area within the redline boundary for the application plus the wider site to the north. Could a more detailed PEA plan be supplied focussing on the redline boundary area? Within this area, what habitats will be impacted by the proposed scheme? How will any removed habitat be compensated for (see also section on Environment (Wales) Act below).

Management Plan

The detailed management plan for the SINC site, as recommended, is welcomed; however, this is required for consideration prior to planning determination. This must also demonstrate how the adjacent SINC will be buffered from any impacts of the development within the redline boundary.

Environment (Wales) Act 2016

What measures will there be to ensure biodiversity is maintained following the development of the area within the red line boundary? Measures for maintenance of biodiversity are required.