

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 4
Date of previous memo: 02/03/2023
Date: 10/03/2023

SUBJECT: P/22/0286 | Erection of four pairs of semi-detached dwellings with associated engineering and landscaping works | Land Adjacent To Kingsley Terrace Aberfan Merthyr Tydfil

Documents submitted in support of the above application:

1. Preliminary Ecological Appraisal. Yr Hen Laethdy, Aberfan. Soltys Brewster Ecology. Draft, **Issue 4, dated 20/02/2023.**
2. TC22081 LA1 Landscape Strategy, **v8, dated 09 March 2023.**
3. TC22081 LA2 Planting Plan, **v8, dated 09 March 2023.**
4. Proposed Site Layout Drawing No. LT2202.04.01 **Rev J**
5. LT2203.04.04 Boundary details, **dated June 22**

Comments (further comments in **green**):

Invasive Non-Native Species (INNS) Method Statement

An INNS method statement, specifically in relation to JKW is *still* required. This must include robust biosecurity and disposal measures.

I see you propose to impose a pre-commencement condition for this. This is acceptable. Written approval from the LPA ecologist required for discharge.

3m Ecology Buffer Protection Measures

Full details of the measures that will be employed to protect the 3m ecology buffer, including the stream, during construction will be provided.

There is nothing included in Document 1 regarding this. A Construction Environmental Management Plan (CEMP) is needed to ensure the buffer zone is properly protected during construction.

A pre-commencement condition for a CEMP is required – written approval from the LPA ecologist required for discharge.

Site Landscape Establishment, Maintenance and Management Plan

This must only use native species of local (if not Welsh) provenance.

The plan will include all new onsite planting including the rain gardens as well as the 3m Ecology Buffer.

The Planting Plan (Document 3) includes non-native/ornamental species. Native species must be used (as above). Therefore, this document requires amendment. NB any lawned areas must also use native species (e.g., <https://wildseed.co.uk/product/mixtures/complete-mixtures/special-habitat-mixtures/flowering-lawn-mixture/#:~:text=EL1%20is%20a%20complete%20mix%20composed%20of%2020%25,10g%2Fm2%20EG1%20or%20lawn%20mixtures%20EG21%20or%20EG22> – or equivalent)

Documents 2 and 3 (as referred to above) are now acceptable.

Lighting Plan

A lighting plan is required. The design of any site lighting as part of the development will reduce light levels along the 3m Ecological Buffer must be demonstrated to be below 0.2lux on the horizontal plane and below 0.4lux on the vertical plane (as per the guidelines cited below).

There must also be dark routes to allow access to bat boxes integrated within the proposed new buildings.

In addition, any luminaires used must conform to the following Bat Conservation Trust / Institute of Lighting Professionals guidelines - <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>. For example, amongst other requirements they will need to have a warm white spectrum (<2700K), a peak wavelength of >550nm, an upward light ratio of 0%, good optical control and be mounted on the horizontal with no upward tilt.

A pre-commencement condition for the lighting plan is acceptable – written approval from the LPA ecologist required for discharge.

Mitigation and Enhancement Measures

Remaining issues:

- 1. Gaps in boundary fences for hedgehogs are detailed within Document 5, but still need to be added to Documents 2 and 4.*

Still required.