

INTERNAL MEMORANDUM

To: David Cross (Planning Case Officer)
From: Matt Davies (Ecologist)
Ext: 5278
Version: 3

Date: 09th June 2021

SUBJECT: P/16/0077 ERECTION OF 23 DWELLINGS WITH ASSOCIATED HIGHWAY WORKS AT LAND TO THE REAR (NORTH-WEST) OF 53-83 EDWARD STREET AND 1-7 TAIR TWYNAU PANT

The following updated reports have been submitted in support of this application:

1. Ecological Assessment. Land at Trevor Close, Pant, Merthyr Tydfil. **May 2021. Issue 1, VB.** BE Ecological.
2. Bat Survey. Trevor Close, Pant, Merthyr Tydfil. **May 2021. Issue 1VB.** BE Ecological Ltd.

Comments below (comments from memo version 2 are boxed and in grey):

Report 1.

Devils bit scabious observed onsite – no requirement has been included for compensation within the final scheme for the plants lost. This needs to be included.

There are foodplants onsite for a range of butterfly species [includes Section 7 species – Environment (Wales) Act 2016 – see **bold** text]. Examples taken at random:

- Red fescue – **grayling**, marbled white
- Bent spp – gatekeeper, meadow brown, **small heath, wall**
- Ribwort plantain – glanville fritillary, heath fritillary
- Greater bird's-foot trefoil – common blue, **dingy skipper**
- Meadow foxtail – small skipper
- Yorkshire fog – marbled white, small skipper, speckled wood, **wall**

More interpretation required here and more specific habitat compensation measures.

No further information relating to the above has been included.

It is noted that the following *mitigation* measures for invertebrates are been suggested (page 44, 6.7.10):

- *Scrub and shrub habitats*
- *Grass and wildflower areas to benefit pollinators*

This isn't really mitigation unless areas of scrub/shrub and grass/wildflowers are proposed to be retained. If not, the measures will be compensatory.

When the scheme design is finalised, suitable measures will need to be specified that will compensate for any areas of lost habitat of value to invertebrates. These areas will not only include those species of value already present, but also improve the diversity by introducing further species. NB devil's bit scabious will need to be included.

Japanese knotweed and Montbretia – comments needed regarding treatment of INNS.

Comments to this effect have not been added.

Reptile survey effort is inadequate – only 4 visits within an optimum month (September). Despite this, I am willing to accept assumption of presence on this site and the Reptile Mitigation Strategy already included within the report.

Comment stands.

On page 56 there is a metal grill – leading to an underground space. Couldn't see anything in the report describing this? What is this? More detail required.

Still nothing in the report about this.

Detailed Landscape and Ecological Management Plan (LEMP) required for the site post-development.

This will still be required.

NB – it appears as though Report 1 has remained completely unchanged apart from the front page, where the version number and date have been updated (NB the content amendment record still says Issue 1, Revision VA (page iii)).

Report 2.

As previously referred to in my initial comments from June 2019 - bat transect surveys should inform, amongst other things, the final layout of the scheme.

NB the scheme has already been designed before taking into account the results of the survey work.

The results of the bat survey work to date have shown that the site is used by foraging and possibly commuting bat species, including lesser horseshoe bat (one of our more rare species) and *Myotis sp.* NB both lesser horseshoe and *Myotis sp.* are particularly light averse.

The bat transect survey work is incomplete as a 'Spring' element is required and has not yet been undertaken. The ecologists were not engaged in time in 2020 to undertake a Spring visit. This will be required in 2021 as we need to understand exactly how bats are using the site throughout the year.

In addition, there are some other shortcomings of the survey work and report that will require attention. For example, the timings of the bat encounters during the transects have not been provided, there is a culvert structure that does not seem to have been considered in terms of bats (deployment of a static detector might be appropriate here).

The survey work and the proposed scheme is therefore unacceptable in its current form.

Whilst my June 2019 comments echoed Tom Bramley's from April 2016 regarding the possibility of a central area running through the development, the current layout is wholly inadequate with only a narrow band of habitat proposed in close proximity to the main spine road and also spanned by other

roads required for access. This is not really what I had in mind and a wider band of habitat would have provided better protection for the stream and more scope for the enhancement of biodiversity.

In the light of this and put together with the incomplete results of the bat transect survey, I would suggest that the stream should instead be culverted or diverted and a wide band of habitat retained and enhanced along the north western section of the site. This would need to be fully informed by the complete results of the bat transect survey work, i.e., following the final visit in Spring 2021.

The version number and date have been updated on the front page, however the content amendment record still says Issue 1, Revision VA (page iii).

The Non Technical summary has not been updated in the light of the further Spring 2021 survey. Similarly, the Conclusions section on page 18.

Pages 8 & 9 have not been updated with the further Spring survey information.

There are two unlabelled figures (pages 14 & 15) showing bat activity locations, but there were three bat transect surveys. This needs amendment.

The results of the Spring transect survey and static detector survey show significantly more bat activity and also identified an increased number of species. This demonstrates the value in completing the survey work in all three time periods. For example – see summary of the static data below where more than twice as many passes were recorded in Spring than in Summer and Autumn combined):

- Summer (June, July, August) – **36** passes (all common pipistrelle)
- Autumn (September October) – **14** passes (all common pipistrelle)
- Spring (April, May) – **60** passes (29, common pipistrelle; 28 *Myotis* sp; 2 brown long-eared bat; 1 noctule).

Page 16, 4.1.6 Bats – evaluation – x4 species is incorrect, as there were at least 5 species of bat identified.

In the light of the completed data set, my view has remained unchanged:

The proposed scheme is unacceptable in its current form.

Whilst my June 2019 comments (prior to the bat survey work) echoed Tom Bramley's from April 2016 regarding the possibility of a central area running through the development, the current layout is wholly inadequate with only a narrow band of habitat proposed in close proximity to the main spine road and also spanned by other roads required for access.

The stream should instead be culverted or diverted and a wide band of habitat retained and enhanced along the north western section of the site. This section will be protected and remain dark in consideration for nocturnal species including bats.

When the scheme has been redesigned, the ecological reports will need amending to reflect the changes.