

CLIENT:	BL Merthyr Ltd
PROJECT:	Cyfarthfa Retail Park – Drive Through
SUBJECT:	Ecology response to Matt Davies’s Internal Memorandum to David Cross (dated 30/08/2024)
JOB NO.:	CA13316 – 001 V1.0 – FINAL
DATE:	04/03/2025
PREPARED BY:	Abigail Coe (Associate Director)
REVIEWED & APPROVED BY:	Sally Caveill (Technical Director)

Wardell Armstrong LLP part of SLR (WA) was commissioned by BL Merthyr Ltd to prepare a response to the ecological comments provided by Matt Davies (Merthyr Tydfil County Borough Council Ecologist) to David Cross (Principal Planning Officer, Merthyr Tydfil County Borough Council) within an Internal Memorandum dated 30/08/2024 with regards to the planning application P/24/0200 – Erection of Coffee Shop with drive through facility – Land to the south of Cyfarthfa Retail Park, Swansea Road, Merthyr Tydfil.

The comments relate to the following reports:

1. Cyfarthfa Retail Park. Preliminary Ecological Appraisal prepared by Wardell Armstrong on behalf of Corona Vulcan Merthyr Limited. Job number: CA13008. Report number: 001. Version: V5.0. Status: Final. Date issued: August 2024.
2. Cyfarthfa Retail Park, Merthyr Tydfil. Soft Landscape Proposal prepared by Sarah Byrne Ltd. SB/CyfarthfaRP/P/01. Revision B. Date: 8 August 2024.

Therefore, please find below a table detailing the comments and relevant WA response.

Technical Note

Table 1 – Ecological response to Matt Davies’ comments		
Matt Davies’ Comment		WA Response
1.	The <i>Executive Summary</i> outlines a list of receptors upon which may be affected adversely due to the proposed scheme in the absence of mitigation. There is no mention of adverse impacts on the habitats present on site (neutral grassland, scattered scrub, scattered trees, dense scrub). Amendments required.	The areas of these habitats are small in size and considered to be common and widespread habitats. Therefore, the habitats within the site boundary are not considered to be of ecological importance at above the site scale. Therefore, no mitigation for the loss of these habitats is considered necessary; however, these habitats could support protected species and therefore reasonable avoidance measures in respect to the protection of these species will be implemented as per the Preliminary Ecological Appraisal Report (PEAR).
2.	Page 6. Para 2.5.4 – “ <i>The vegetation on Site had been trimmed to ground level which reduced the ability to identify some plant species on Site.</i> ” Technically, this is a pre-emptive clearance prior to a planning application.	No pre-emptive clearance site clearance has been undertaken. Full planning permission is already in place for this site (P/23/0254) and the vegetation on site has been managed under this planning permission. This new planning application (P/24/0200) has been submitted to slightly amend the proposed development design.
3.	Page 30, para 4.2.8 – “ <i>If allowed to regrow, the areas of dense scrub and neutral grassland on Site could have potential to support common reptiles.</i> ”	As per the photographs provided by Matt Davies within his comments, the vegetation on site has been allowed to regrow. As stated within the PEAR, these habitats on site have the potential to support common reptiles. However, given the small size of the site, it is considered that the site would only support

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	An impromptu, but brief site visit by the LPA ecologist (on the 30/08/2024) has confirmed that the site has been allowed to re-grow since the PEA was undertaken in January 2024. An amendment to Document 1 is therefore required regarding reptiles.	individual / low numbers of common reptiles and the site would not support a significant population of any common reptile species. The Reasonable Avoidance Measures stated within the PEAR (Paragraphs 4.2.8 – 4.2.10) are considered reasonable and appropriate to avoid the killing / injuring of individual common reptiles during the construction phase. No further mitigation measures are considered necessary.
4.	Document 1 includes reference to 18 species of plant (mostly native), but stresses the reference is not limited to these species – due to the suboptimal time of year the survey was undertaken (January 2024) and the pre-emptive clearance. NB during the impromptu and brief site visit by the LPA ecologist in August 2024, at least 21 further species were observed over and above those recorded during the January 2024 survey. Taking the total species onsite to at least 39. Document 2 includes 19 species (mostly ornamental non-native or cultivars). Clearly, therefore this does not represent maintenance and enhancement of biodiversity or Net Benefit for Biodiversity. All species within the landscaping plan must be native species of local (if	The Soft Landscape Proposals for this site have been reviewed and amended to include more native species, more woody species within the proposed hedgerow as well as a more species rich grassland seed mix (see the attached revised plan: Cyfarthfa Retail Park, Merthyr Tydfil. Soft Landscape Proposal prepared by Sarah Byrne Ltd. SB/CyfarthfaRP/P/01. Revision D). In detail, the following has been amended: 1. Trees – increase in size of the multi stem hazel and birch trees. 2. Hedging mix 1 – Number of varieties have been increased and the area extended.

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not Welsh/UK) provenance. The number of native species within the final scheme must exceed the number currently recorded to date on site. In addition, whilst there is compensation for the onsite tree and scrub habitat in the form of tree and hedgerow planting, there is no such compensation for the loss of the neutral grassland habitat. Suggestions for improving the number of native species plus compensating for the loss of grassland habitat: • Use of all native species • Use of at least x5 woody species in the proposed hedge • Creation of a green roof • Creation of areas of wildflower grassland.	- Mix S1 and S2 has been simplified and now is native or near native mix. Mostly evergreen and low maintenance. - A native hawthorn hedge has been used to deter crossing over place H2. - A near native holly has been used to screen services area H3. - A native Climate Smart Grass and native flower mix has been used to the front of the site G1 and G2. The requirements for a Net Benefit for Biodiversity do not solely rely on an increase in number of species present within the site. Protected species enhancements can be included within the net benefit. The following species enhancement measures will be included within this development ensuring that overall the development provides a net benefit for biodiversity: • 2x open-fronted nest boxes to be located at approximately 2m height on the southern side of the fence around the refuse store. The open-fronted nest

Technical Note

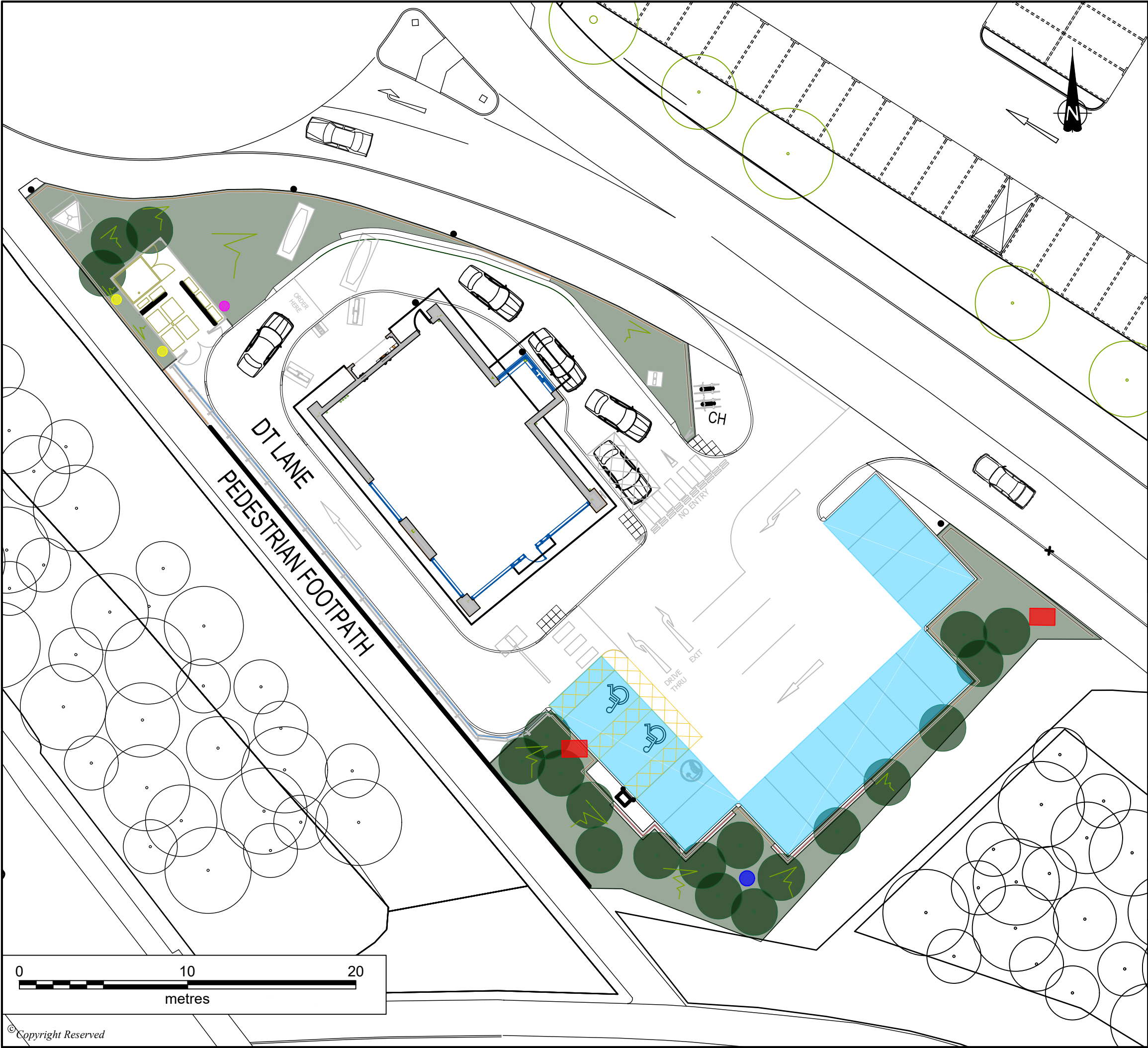
Table 1 – Ecological response to Matt Davies’ comments		
Matt Davies’ Comment		WA Response
		boxes will be placed so that they are hidden by the new proposed hedgerow (H2). • 1x insect hotel to be installed on the eastern side of the fence around the refuse store; • 2x log piles to be placed directly adjacent to the newly planted hedgerow (H1); and • 1x hibernacula to be placed adjacent to the newly planted hedgerow (H1).
5.	<i>Document 2</i> <i>In addition to the other changes required (as outlined in the section above - could the hedge not extend around the whole of the south western boundary?</i>	The hedgerow extend has been extended as far as possible.
6.	<i>Planning Policy Wales 12 (PPW 12)</i> <i>Planning Policy Wales (PPW 12), Chapter 6 must be considered where relevant to this application. The following is required:</i> <i>A Green Infrastructure Statement (GIS) that:</i> • <i>will describe how green infrastructure has been incorporated into planning proposals;</i>	Full planning permission is already in place for this site (P/23/0254). A Green Infrastructure (GI) Statement was not considered necessary for this planning application. Given the small scale of the site and the limited extent of existing green infrastructure present on site, it is considered that a GI Statement is not proportionate or necessary for this application.

Technical Note

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<i>must be used for demonstrating how the step-wise approach has been applied; and should highlight baseline data considered and surveys and assessments undertaken, sustainable drainage statements, landscape and ecological management plans etc.</i> <i>In addition, the policy indicates that the step wise approach is the means of demonstrating the steps taken towards securing a net benefit for biodiversity. The onus is on developers to bring forward proposals in a way that will achieve a net benefit for biodiversity demonstrating how they have used the step-wise approach.</i> <i>NB each stage of the step-wise approach must be accompanied by a long-term management plan. The management plan should set out:</i> <i>the immediate and on going management of the site;</i> <i>future monitoring arrangements for all secured measures;</i> <i>the funding mechanisms in place to meet the management plan objectives;</i> <i>how a net benefit for biodiversity will be achieved within as short a time as possible and be locally responsive and relevant to local circumstances.</i>	

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	<i>Having provided evidence in the Green Infrastructure Statement that the step wise approach has been followed, a scheme of enhancements must also be provided to ensure a net benefit for biodiversity.</i> <i>The resilience of ecosystems must also be considered, in particular, the following attributes, known as the DECCA Framework.</i> <i>Planning Policy Wales 12 also requires that where trees are unavoidably lost due to development - ‘Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost.’</i>	
7.	Enhancements Full details of the enhancement measures are required, including model type, specifications, design, position, orientation etc (i.e., for bat and bird boxes, hibernacula, woodpiles/loggeries, bug hotels). Wildlife box models will be constructed from woodcrete or woodstone for reasons of longevity. Enhancements must be clearly marked on all relevant architect plans/drawings/elevations.	An Ecological Enhancement Plan (CA13316/001) has been prepared which includes the full details and locations of the above detailed ecological enhancement measures (see attached).



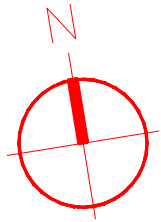
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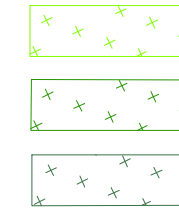
- Open-fronted nest box (such as Eco Robin Nest Box or similar) mounted at 2m height on the south-western side of the wooden fence around the refuse store
- One insect hotel (such as National Trust Insect Tower or similar) mounted at 2m height on the eastern side of the wooden fence around the refuse store
- Log pile directly adjacent to the newly planted hedgerow approx. 1m x 1m
- Hibernacula adjacent to the newly planted hedgerow created from rubble and soil approx. 1m x 1m

REVISION	DETAILS	DATE	DRN	CHK'D	APP'D
CLIENT					
BL Merthyr Ltd					
PROJECT					
Cyfarthfa Retail Park - Drive Through					
DRAWING TITLE					
Ecological Enhancement Plan					
DRG No.	CA13316/001				REV A
DRG SIZE	A3	SCALE	1:250	DATE	19.02.25
DRAWN BY	GR	CHECKED BY	AC	APPROVED BY	SC





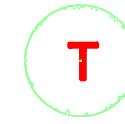
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Grass Mix

Shrub Mix

Hedge Mix



Tree

Exact locations to be agreed on site.



Log walls

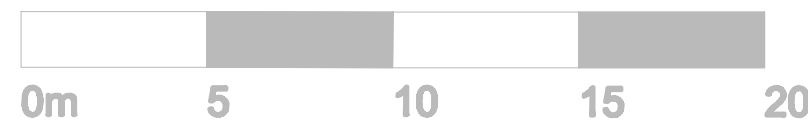
Exact locations to be agreed on site.

TREES					
Tag No	Species	Girth/Height	Root Type	Designation	Qty
T1	Corylus avellana	2-2.5 m HT	Rootball 3 x tr	Multistem	12
T2	Pinus nigra	14 - 16 cm G	Rootball	Standard	3
T3	Betula pendula	14-16 cm G	Rootball	Standard	5

HEDGING					
Tag No	Species	Root type	Density / lin m	Approx %Mix	Qty
H1 (117m ²)	Crataegus monogyna	Bareroot 80-100cm ht 1+1	3/m ²	25	88
	Rosa canina	Bareroot 1+1 40-60 cm ht	3/m ²	10	35
	Ilex aquifolium	2lt pot 40-60 cm ht	3/m ²	5	18
	Lonicera periclymenum	2lt pot cane	3/m ²	5	18
	Carpinus betulus	Bareroot 80-100 cm ht 1+1	3/m ²	35	123
	Acer campestre	Bareroot 80-100 cm ht 1+1	3/m ²	10	35
H2 (9m ²)	Frangula alnus	Bareroot 80-100 cm ht 1+1	3/m ²	10	35
	Crataegus monogyna	100-120 cm ht 1+2	5/lin m	100	45
H3 (19m ²)	Ilex x meserveae Blue Prince	40-60cm ht 5 lt pot	3/m ²	100	57
Note: Mix the species informally through the (H1 hedge) area.					

Shrubs					
Grass	Species	Pot Size or Bareroot	Density / m	Approx %Mix	Qty
S1 (39m ²)	Buxus sempervirens	3lt pot	7	15	18
	Hedera helix Erecta	3lt pot	7	10	27
	Hedera helix Green Ripple	2lt pot	9	25	88
	Alchemilla mollis	2lt pot	7	25	68
	Euonymus fortunei Green Spire	2lt pot	5	25	49
S2 (26m ²)	Hedera helix Erecta	3lt pot	7	10	18
	Hedera helix Green Ripple	2lt pot	9	25	59
	Alchemilla mollis	2lt pot	7	25	46
	Euonymus fortunei Green Spire	2lt pot	5	40	52
G1 (84m ²) and G2 (26m ²)	Supplier: Germinial Grass Seed Mixture Breakdown:	Sowing rate: 5gm per metre			
	30.0% TALL FESCUE (Festuca arundinacea)				
	10.0% CRESTED DOGSTAIL (Cynosurus cristatus)				
	25.0% HARD FESCUE (Festuca trachyphylla)				
	10.0% BROWNTOP BENT (Agrostis capillaris)				
	0.5% BIRDFOOT TREFOIL (Lotus corniculatus)				
	4.5% BURNET (Sanguisorba)				
	4.5% COMMON VETCH (Vicia sativa)				
	7.5% SAINFOIN (Onobrychis viciifolia)				
	0.25% YARROW (Achillea millefolium)				
	0.25% AGRIMONY (Agrimonia eupatorium)				
	0.5% OXEYE DAISY (Leucanthemum vulgare)				
	0.25% YELLOW RATTLE (Rhinanthus minor)				
	1.25% CORN POPPY (Papaver rhoeas)				
	0.1% CORN CHAMOMILE (Anthemis arvensis)				

SCALE 1:100



Rev	By	Date	Description
Drawing Status: PLANNING			

Client:
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sarah byrne limited
MC181

Horticultural and Landscape Design Consultant

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Project:
Cyfarthfa Retail Park
Merthyr Tydfil

Drawing:
Soft Landscape Proposal

Drawn by: **SC** Date: **20 February 2025**
Checked by: **SB** Date: **20 February 2025**
Approved by: _____ Date: _____

SB/CyfarthfaRP/P/01
Drawing Scale: **1:100 @ A1**

Revision:
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