



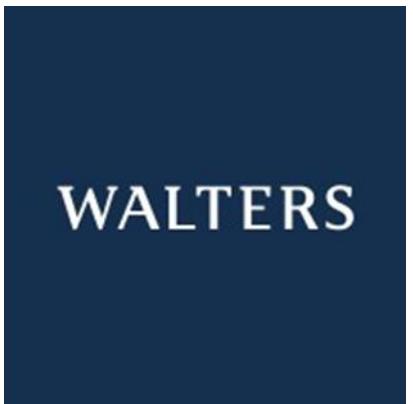
Sylvan Ecology

PRELIMINARY ECOLOGICAL APPRAISAL

HOOVER SITE,

MERTHYR TYDFIL

For:



WALTERS

Project: Hoover Site, Merthyr Tydfil

Project Number	K001	
Title	Preliminary Ecological Appraisal	
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Executive summary

Site	The site is considered to be of low-moderate ecological value. The habitat on site with the highest ecological value are the small areas of woodland on site.
BATS	Potential High Impact – There are multiple buildings within the survey site that may potentially support bats. Further survey is required to determine whether bats are present on site before any work can commence. There are many trees within and surrounding the site. No trees were noted to have PRFs at time of survey.
REPTILES	Potential Low Impact – Potential habitat to support reptile species was observed on site and along the site boundaries. Further survey may be required if works have the potential to impact these species. – Recommendation: impacts negated through mitigation.
DORMOUSE	Negligible Impact – Dormouse are considered unlikely to be present within the site.
BIRDS	Moderate Impact – There are known colonies of gull species which have been previously recorded nesting on the rooves of multiple factory buildings within the site. The surrounding area is used by a number of commoner birds and the trees and scrub on site provide suitable nesting habitat. Old nests were noted within trees around the site boundary. – Recommendations: impacts negated through mitigation.
GCN	No Impact – No potential for GCN on site.
INVERTEBRATES	Negligible Impact – Very limited potential for priority species on site – Recommendation: Potential enhancement opportunities.

Conclusion

Providing the recommended mitigation measures are adopted, relevant legislation will not be contravened, and Ecological issues will not preclude the development.

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1 INTRODUCTION

Background

1.1 Sylvan Ecology was commissioned to carry out a *Preliminary Ecological Appraisal* survey and desk study for a proposed development at the *Hoover Site, Merthyr Tydfil*.

Ecological Context

1.2 The site is comprised of one large site and two smaller secondary sites. The largest area is located to the west of Merthyr Road and is an industrial unit. The site is mainly comprised of several large buildings and areas of hard standing. Multiple small buildings are located throughout the site. Around the site boundaries are scattered broadleaved trees, scrub, and semi-improved grassland. The south of the site is comprised of a cricket club which has a large area of amenity grassland, bare ground, two buildings and areas of scrub, woodland and introduced shrubs. A smaller site is located to the northeast of the largest site. The site is an old car park comprised mainly of hard standing with borders of scrub and woodland. The smallest site is located to the south of this site. It comprises two buildings, hard standing and boundaries of scrub and woodland.

1.3 The site lies approximately 2km to the southeast of Merthyr Tydfil. All associated land for the proposed development (herein referred to as the site) is located at:

- central OS grid reference: SO 05768 04156;
- nearest post code: CF48 4TU.

1.4 The immediate surrounding landscape is mainly industrial and commercial units. In the wider surrounding area there are residential areas, fields, and wooded areas. The Cardiff to Merthyr railway line is adjacent to the west of the site. The River Taff is located on the far side of the railway line approximately 30m to the west of the site boundary. The town of Merthyr Tydfil is located to the northwest.

Aims of Study

1.5 The aims of the study are to:

- determine the types of habitat that are present within the site;
- assess the likely presence of protected species and species of principal importance for nature conservation within the site;
- identify any potential ecological constraints to development within



- the site;
- identify requirements for any additional ecological surveys needed to determine potential ecological impacts; and
- describe measures to mitigate or compensate for any impacts on the ecological interest of the site.



2 METHODOLOGY

Desk Study

2.1

Existing ecological and nature conservation data relevant to the site were collated from various sources:

- Information relating to protected and notable species within 2km of the site was provided by *LERC Wales' Biodiversity Information & Reporting Database*, who also provided information relating to statutory designated sites;
- The Data Map Wales website (<https://datamap.gov.wales/>) was reviewed to determine whether there are any internationally important statutory designated sites for nature conservation, and for other statutory designated sites for nature conservation, within 2km from site; and
- Google Earth was used to review aerial photographs of the site and surrounding area in order to better understand the setting and ecological context of the site.

Field Survey

2.2

An ecology walkover was undertaken in accordance with the methodology set out in JNCC, 2010¹ by David Price MCIEEM in March 2025 and Alice Wheeler on 4th June 2024 . The survey was carried out under optimal weather conditions, so the ground was soft enough to identify species specific prints.

2.3

The survey involved a site walkover of the area falling within site boundary shown on the map in Appendix A, in order to map the main habitat types present. Detailed target notes were made in relation to any notable features considered important to the ecology of the site: these are referred to by the prefix TN in order to assist cross-reference to the habitat map provided in Appendix A.

2.4

The survey was extended to include assessment of the potential of the site to support protected or notable species. Although this approach supports an initial analysis of the likely presence of protected or notable species, a comprehensive assessment may require specialist expertise and/or season-critical survey techniques, which fall beyond the scope of

¹ JNCC (2010) *Handbook for Phase 1 habitat survey - a technique for environmental audit*, Revised reprint 2010, JNCC. Peterborough



this study. The presence of protected species was noted where possible, but walkthrough surveys cannot usually confirm species presence or absence; only the likelihood of presence can be assessed.

2.5 This is a standard technique for obtaining baseline ecological information for areas of land, including proposed development sites.

2.6 The dominant and readily identifiable higher plant species identified in each of the various habitat parcels were recorded and their abundance was assessed on the DAFOR scale:

- D: Dominant
- A: Abundant
- F: Frequent
- O: Occasional
- R: Rare
- L: Locally, appended to any of the above five categories to reflect local distribution within the site.

2.7 (These scores represent the abundance within the defined area only and do not reflect national or regional abundances).

2.8 Additionally, incidental records of fauna were also made during the survey and the habitats identified were evaluated for their potential to support legally protected species and other species of conservation concern, including species of principal importance for the purpose of maintaining and enhancing biodiversity, listed in Section 7 of the *Wales Environment (Wales) Act 2016*.

Limitations

2.9 The field survey was conducted at an optimal time of year for botanical recording. However, it cannot be discounted that further species may be present later in the year, which were not apparent at the time of survey. Nonetheless, the purpose of this report is not to compile a comprehensive species list but to establish habitat type and potential ecological constraints. Due to the nature of the site, it is considered that sufficient information was gathered for the purposes of this assessment.



3 RESULTS

Desk Study

3.1

Information relating to designated sites, protected and notable species within 2 km of the site was provided by LERC Wales' Biodiversity Information & Reporting Database, who also provided information relating to statutory designated sites; LERC Reference: 0256-437.

Desk Study - Habitats

Statutory & Non-Statutory Designated Sites for Nature Conservation.

3.2

The site was subjected to a search for designated sites within a 2km radius of the site using data supplied by the Aderyn and online desk-based resource MAGIC. The data supplied identified one statutory SSSI and 14 non-statutory SINCs within a 2km radius of the site. Table 1 below shows all the non-statutory sites within 1km of the site.

Table 1. Summary of Designated Sites within a 2 km radius of the application site

Site Name	Designation	Reason for Designation	Approximate distance from the project site	Importance
Cwm Glo a Glyndyrys	SSSI and SINC	Extensive areas of marshy grassland, species-rich neutral grassland, acid grassland, woodland, and heath. Great crested newts have been recorded in ponds on site.	0.5km	National (SSSI) and Local (SINC)
Afon Taf/River Taff	SINC	River corridor including areas of bankside habitats. Known to support otters.	Directly adjacent to western site boundary	Local
Maes Abercanaid/ Abercanaid Fields	SINC	Fields containing marshy grassland and small areas of semi-natural woodland, scattered scrub and trees.	0.2km	Local
Maes Pentrebach/ Pentrebach Fields	SINC	Species-rich semi-improved neutral grassland alongside disused railway embankment. Scattered dense scrub, bracken slopes, dry heathland, and acid grassland are also present.	0.3km	Local
Rhydycar West	SINC	Extensive mosaic of 'ffridd' habitats and former mine spoil. Great crested newts occur in small ponds on site.	0.5km	Local
Pentrebach Tip	SINC	Large colliery spoil tip, dry heathland and 'ffridd.'	0.6km	Local
Glynmil	SINC	Mosaic of 'ffridd,' old colliery spoil tips, purple moor-grass pastures, acid flush, unimproved acid grassland, woodland and several ponds and small streams.	0.6km	Local
Graig Gethin	SINC	Wooded 'ffridd,' extensive ancient semi-natural oak woodland, bracken slopes, and scree areas.	0.8km	Local



Desk Study - Species

Bats

3.3 Aderyn provided 86 records for at least six species of bat within 2 km of the site. These are common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*), noctule (*Nyctalus noctula*), Greater horseshoe bat (*Rhinolophus ferrumequinum*), Lesser horseshoe bat (*Rhinolophus hipposideros*), and brown long-eared bat (*Plecotus auritus*). In addition, Aderyn also provided records of unidentified pipistrelle bat species (*Pipistrellus spp.*), unidentified Myotis species (*Myotis spp*) and unidentified bat species (*Chiroptera*).

3.4 The nearest bat records provided by Aderyn is located approximately 350 m from site on the Taff Trail and is for a common pipistrelle bat recorded in 2011.

Otter

3.5 LERC provided eighteen records for otter within 2 km of site, the closest record is 0.2 km from site (dated 1992).

Great Crested Newt (GCN)

3.6 Aderyn provided fourteen records for GCN (*Triturus cristatus*) within 2km of the application site, the closest record is 1.2km west of the site.

Reptiles

3.7 Aderyn provided fourteen records of reptiles within 2km of the application site. These comprised of common lizard (*Zootoca vivipara*), grass snake (*Natrix helvetica*), and slow worm (*Anguis fragilis*). The closest of these records was for grass snake located on the railway embankment adjacent to the former Hoover site.

Badgers

3.8 Aderyn provided six badger (*Meles meles*) records within 2km of the site. The badger was roadkill found 629m southwest of the site.

Dormouse

3.9 Aderyn provided no records for dormice (*Muscardinus avellanarius*) within 2km of the application site.

Invertebrates

3.10 Aderyn provided fifty records for priority species of invertebrates within 1km of the application site. The species are *Eugnorisma glareosa*, *Timandra comae*, *Ceramica pisi*, *Bombus humilis*, *Spilosoma lutea*, *Xanthorhoe ferrugata*, *Apamea remissa*, *Amphipoea oculea*, *Agrochola helvola*, *Hipparchia semele*, *Allophyes oxyacanthae*, *Acronita rumicis*, *Euphydryas aurinia*, *Xestia castanea*, *Hydraecia micacea*, *Cirrhia icteritia*, *Scotopteryx chenopodiata*, *Leucania comma*, *Coenonympha pamphilus*,



Ecliptopera silacea, Crambus patella, Bombus monticola, Bombus pascuorum, Craniophora ligustri, Bom Diarsia rubi and Spilosoma lubricipeda.

Habitat assessment

3.11 A map showing the habitats present within the site is given in Appendix A. Photographs depicting the main ecological features may be found below.

3.12 Eleven habitat types were identified within, or immediately adjacent to the boundary of the site, as follows:

- Bare ground;
- Hard standing;
- Scattered broadleaved trees;
- Semi-improved grassland;
- Amenity grassland;
- Broadleaved woodland;
- Introduced shrub;
- Dense scrub;
- Scattered scrub;
- Invasive species; and
- Buildings.

Bare Ground

3.13 A small area of bare ground was present to the rear of the cricket club. This bare ground formed a dirt road from the entrance to the club to behind the bowling green.

Hard Standing

3.14 Areas of hard standing were present throughout the site. These areas were mainly roads, car parks, or walkways. Sparse vegetation was present within these areas. Species present included herb Robert (*Geranium robertianum*), nettle, willowherb species, buddleia (*Buddleja davidii*), dandelion species, St John's wort (*Hypericum* spp.), creeping buttercup (*Ranunculus repens*), dog rose (*Rosa canina*), bramble, nettle (*Urtica dioica*), thistle species (*Cirsium* spp.), gorse (*Ulex europaeus*), ivy (*Hedera helix*), white clover (*Trifolium repens*) and ragwort (*Senecio jacobaea*).



3.15

Scattered Trees

Scattered trees were present throughout the site. The majority of these trees were located along the eastern site boundary and were predominantly *Acer spp.* Two birds' nests were recorded in scattered trees at the time of survey. A full list of the tree species and their locations can be found in bat tree report.

Photo 1: Row of *Acer spp* along the eastern site boundary of the main Hoover site.



3.16

Semi-Improved Grassland

Semi-improved grassland was mainly present around the boundaries of the site. The species compositions varied between areas and are listed below.

- SI-1- Grass species present included perennial ryegrass (*Lolium perenne*) (D), Yorkshire fog (*Holcus lanatus*) (A) and cock's-foot (*Dactylis glomerata*) (A). The grassland was relatively species-poor. Species present included dandelion species (R), daisy (*Bellis perennis*) (R), ribwort plantain (*Plantago lanceolata*) (R), white clover (F), broad-leaved dock (*Rumex obtusifolius*) (R), nettle (R), ragwort (R), creeping buttercup, herb Robert, lesser celandine (*Ficaria verna*), thistle species (O), yarrow (*Achillea millefolium*) (R), cuckooflower (*Cardamine pratensis*) (R), red dead nettle (*Lamium purpureum*) (R), bird's-foot-trefoil (*Lotus corniculatus*)



(R), common field speedwell (*Veronica persica*) (R), vetch species (*Vicia* spp.) (R), wild strawberry (*Fragaria vesca*) (R), barren strawberry (*Potentilla sterilis*) (R), germander speedwell (*Veronica chamaedrys*) (R) and field madder (*Sherardia arvensis*) (R).

- SI-2- Grass species present included perennial ryegrass, Yorkshire fog (D), and cock's-foot (D). The grassland was relatively species-poor. Species present included dandelion species (R), daisy (R), ribwort plantain (R), white clover (O), broad-leaved dock (O), cleavers (R), nettle (R), ragwort (R), creeping buttercup (R), herb Robert (R), lesser celandine (R), thistle species (R), square-stalked willowherb (R), wild strawberry (R), germander speedwell (R), field madder (R) and common-field speedwell (R).

Photo 2: Area of semi-improved grassland present in the northern corner of the main Hoover site (SI-1).



Amenity Grassland

3.17

Amenity grassland is present within the site located within the cricket club grounds. The species compositions varied between areas and are listed below.

- AG1- The grassland is regularly managed, and sward height was short which may have limited identification of species present. Grass species present included perennial ryegrass (D) and Yorkshire fog (D) . The grassland was relatively species-poor. Species present included creeping buttercup (R), dandelion species (R), daisy (R), ribwort plantain (R), broad-leaved dock (R),



barren strawberry (R), cranesbill species (*Geranium* spp.) (R), thistle species (R), white clover (A), field forget-me-not (O), and herb Robert (R).

Photo 3: Amenity grassland (AG1) comprising the majority of the cricket club to the south.



Broadleaved Woodland

3.18

Broadleaved woodland was located around the site boundaries in several areas. The species compositions varied between areas and are listed below.

- BW1- Species present included ash (*Fraxinus excelsior*), silver birch (*Betula pendula*), willow species (*Salix* spp.), alder (*Alnus glutinosa*), hazel (*Corylus avellana*), and Norway maple (*Acer platanoides*). The understorey comprised of creeping cinquefoil (*Potentilla reptans*), bramble, nettle, cleavers, ivy, blackthorn (*Prunus spinosa*), dogwood (*Cornus sanguinea*), cherry laurel (*Prunus laurocerasus*), holly (*Ilex aquifolium*), wild privet (*Ligustrum vulgare*), and hawthorn.
- BW2- Species present included ash (O), alder (A), silver birch (A), willow species (O), oak species (R), and sycamore (R). The understorey comprised of bramble (A), nettle (A), cleavers (O), ivy (A), hazel (R), blackthorn (R), and hawthorn (R).



Photo 4: Broadleaved woodland present within the water pumping site to the east (BW2).



Introduced Shrub

3.19

There were two areas of introduced shrub within the site boundaries which were both located in the cricket club grounds. The first area was located in the southern corner of the site. The second was located in the form of a hedgerow around the bowling green. The species compositions varied between areas and are listed below.

- IS1- Species present included cherry laurel (D), snowberry (*Symporicarpos albus*) (O) and Wilson's honeysuckle (*Lonicera nitida*) (O) .
- IS2- Species present included cherry laurel (D), shasta daisy (*Leucanthemum* spp.) (O), and montbretia (*Crocosmia* spp.) (O).



Photo 5: Introduced shrub hedgerow surrounding the bowling green to the south of the site (IS2).



Dense Scrub

3.20

Dense scrub was present throughout the site, mainly along the site boundaries. Species composition varied between locations and descriptions of the habitats present can be found below.

- DS1- Species present included rockspray cotoneaster (*Cotoneaster horizontalis*) (A), oak species saplings (R), sycamore saplings (R), hawthorn (R), dog rose (R), bird's-foot-trefoil (R), field forget-me-not (R), ash saplings (R), silver birch saplings (R), red clover (*Trifolium pratense*) (R), willow species saplings (R), buddleia (D), bramble (D), square-stalked willowherb (R), rosebay willowherb (R), ribwort plantain (R), elder (*Sambucus nigra*) (R), holly (R), gorse (R), broad-leaved dock (R), cleavers (R), nettle (R), alder saplings (O), barren strawberry (R), bracken (*Pteridium aquilinum*) (R), forsythia (*Forsythia* spp.) (R), hogweed (*Heracleum sphondylium*) (R), firethorn (*Pyracantha coccinea*) (R), yarrow (R), cherry laurel (R), Franchet's cotoneaster (*Cotoneaster franchetii*) (R), bearberry cotoneaster (*Cotoneaster dammeri*) (R), coralberry (*Symporicarpos orbiculatus*) (R), dogwood species (*Cornus* spp.) (R), dandelion species (R), Norway maple saplings (O), perennial ryegrass (R), common



chickweed (R), creeping cinquefoil (R), ivy (F), wild parsnip (*Pastinaca sativa*) (R), creeping buttercup (R), thistle species (R), horsetail species (*Equisetum* spp.) (R), white clover (R), common field speedwell (R), germander speedwell (R) and cock's-foot (O).

- DS2- Species present included buddleia (F), bramble (D), square-stalked willowherb (R), rosebay willowherb (R), ribwort plantain (R), broad-leaved dock (R), cleavers (R), nettle (O), creeping buttercup (R), coralberry (R), dandelion species. (R), perennial ryegrass (O), hogweed (O), ivy, white clover (O), common field speedwell (O), germander speedwell (O), cock's-foot (O), ash saplings (R), and sycamore saplings (R).
- DS3- Species present included rockspray cotoneaster (D), bird's-foot-trefoil (O), hawthorn (O), creeping buttercup (O), rose species (*Rosa* spp.) (O), white clover (O), buddleia (O), bramble (A), square-stalked willowherb (R), rosebay willowherb (R), ribwort plantain (R), broad-leaved dock (R), cleavers (R), coralberry(R) , dandelion species (R) and nettle (R) .
- DS4- Species present included bird's-foot-trefoil (R), hawthorn (R), foxglove (*Digitalis purpurea*) (R), thistle species (R), vetch species (R), dog rose (R), white clover (R), buddleia (F), bramble (A), square-stalked willowherb (R), rosebay willowherb (R), common field speedwell (R), germander speedwell (R), ribwort plantain (R), broad-leaved dock (R), cleavers (R), creeping buttercup (R), dandelion species (R), nettle (R) and mullein (*Verbascum thapsus*) (R).
- DS5- Species present included hawthorn (F), thistle species (O), vetch species (R), dog rose (O), white clover (R), buddleia (O), bramble (A), square-stalked willowherb, rosebay willowherb (A), bittersweet (*Solanum dulcamara*) (R), divaricate cotoneaster (*Cotoneaster divaricatus*) (R), rockspray cotoneaster (R), creeping buttercup (R), oak saplings(R) , sycamore saplings (R), oxe-eye daisy (*Leucanthemum vulgare*) (R), bird's-foot-trefoil (R), foxglove (R), mullein (R), common field speedwell (R), germander speedwell (R), ribwort plantain (R), grass vetchling (*Lathyrus nissolia*) (R), herb Robert (R), field forget-me-not (R), broad-leaved dock (R), cleavers (R), Himalayan balsam (*Impatiens glandulifera*) (O), dandelion species (R) and nettle (F).



Photo 6: Dense scrub along the western boundary of the cricket club adjacent to the railway (DS5).



Scattered Scrub

3.21

Scattered scrub was present in areas throughout the site. The species compositions varied between areas and are listed below.

- SS1- Species present included rockspray cotoneaster (F), hawthorn (O), dog rose (O), buddleia (D), bramble (F), square-stalked willowherb (R), rosebay willowherb (R), ribwort plantain (R), gorse (F), Franchet's cotoneaster (F), bearberry cotoneaster (O), coralberry (R), dogwood species (R), ivy (R), birch saplings (R), thistle species (R) and horsetail species (R),
- SS2- Species present included buddleia (R), bramble (D), square-stalked willowherb (R), rosebay willowherb (R), and sycamore saplings (R).
- SS3- Species present included buddleia (F), bramble (D), square-stalked willowherb (F), rosebay willowherb (F), hazel (A), nettle (O), and thistle species (O).



Photo 7: Scattered scrub present within the old car park to the northeast (SS1).



Buildings

3.22

There were multiple buildings throughout the site. The majority of buildings on the site were in a state of disrepair and contained gaps, holes, cracks in brickwork and lifting materials that provided potential for roosting bats.

Invasive Species

3.23

Several stands of invasive species were located throughout the site. All of these areas have been marked on the map using target notes. Rockspray cotoneaster was located in multiple areas throughout the site. The greatest density of stands was located along the southern boundary of the old car park to the east (TN2). A smaller stand was located along the eastern boundary of this car park (TN1) along with snowberry (*Symporicarpos albus*). Two small areas of rockspray cotoneaster were found along the site boundaries of the main Hoover site. One was located on the eastern site boundary (TN4) and the other was located on the western site boundary (TN5).



Photo 8: Large area of rockspray cotoneaster present in the old car park to the north of the site (TN1).



3.24 In an area of scattered scrub behind the cricket club main building there were several small areas of bamboo shoots (TN10). It was not possible to identify the species at the time of survey because there was very limited growth.

3.25 Montbretia was located within the introduced shrub hedgerow around the bowling green (TN11). It was interspersed within the understorey vegetation in this location.

3.26 Himalayan balsam was found within the dense scrub bordering the cricket field along the western site boundary (TN12). It was noted throughout the scrub in patches. Full mapping of its extent within the scrub was not possible due to the density of the vegetation present.

Photo 9: Himalayan balsam present within the dense scrub on the western boundary of the cricket field (TN12).





Target Notes

3.27

Target notes for site are summarised below:

- TN1: Small area of rockspray cotoneaster located along the eastern boundary of the car park.
- TN2: Large area of rockspray cotoneaster located along the southern boundary of the car park.
- TN3: Old woodpigeon nests identified in the previous survey in a tree along the eastern site boundary of the main site.
- TN4: Area of rockspray cotoneaster located along the eastern boundary of the main site.
- TN5: Small area of rockspray cotoneaster located along the western boundary of the main site.
- TN6: Nesting gull species present on the roof of the main site buildings.
- TN7: Cardiff to Merthyr railway line running adjacent to the west of the site.
- TN8: Bees nest located in a crack in the brickwork of one of the buildings in the main site.
- TN9: Birds nest in a lime tree behind the cricket club building.
- TN10: Small shoots of bamboo growing within the scattered scrub beneath the trees behind the main cricket club building.
- TN11: Montbretia present within the cherry laurel hedgerow surrounding the bowling green to the south of the site.
- TN12: Himalayan balsam present in areas throughout the dense scrub along the western site boundary of the cricket field.
- TN13: Area of Japanese knotweed on the east back of the River Taff. This was identified in doc: *GC4005-RED-74-XX-RP-L-0001* and was found to still be present.

Fauna

3.28

The following species' evidence of their presence were incidentally recorded during the course of the survey:

- Wood pigeon (*Columba palumbus*);
- Carrion crow (*Corvus corone*);
- Jackdaw (*Coloeus monedula*);
- Magpie (*Pica pica*);
- Herring gull (*Larus argentatus*);
- Lesser black-backed gull (*Larus fuscus*);
- Blackbird (*Turdus merula*);
- Starling (*Sturnus vulgaris*);
- Robin (*Erithacus rubecula*);
- Red kite (*Milvus milvus*) seen circling above the site and;
- Rabbit droppings located in some of the semi-improved grassland.



4 SITE EVALUATION

Baseline Evaluation Criteria

4.1 Based on the site survey results, an ecological evaluation of the site was undertaken using a combination of evaluation criteria for habitats and species, although the general framework follows that provided by CIEEM² (see Table 2 below).

4.2 Where relevant the evaluation was made with reference to the statutory protection afforded to species and habitats.

4.3 Legal protection does not always correspond to conservation value. Some species (e.g., badgers) are protected for reasons of animal welfare rather than conservation. Others are of national conservation value but are not protected by law (e.g., *Environment (Wales) Act 2016*. Section 7 Priority species).

Table 2: Determination of ecological value.

Evaluation Value	Example of Habitat or species
International	An internationally designated site or candidate site, including habitat or species included within Special Protection Areas (SPA) / Special Areas of Conservation (SAC), Ramsar Sites, listed under Annex 1 of the Habitats Directive.
National	Sites designated at UK level, e.g., Sites of Special Scientific Interest (SSSI), supporting species considered nationally threatened or rare. A regularly occurring regionally or county significant population/number of any nationally important species A feature identified as of critical importance within Section 41 of the NERC Act (2006).
Regional	Key Habitat type included within BAP. A regularly occurring, locally significant number of a regionally important species.
County	A site designated as a Site of Importance for Nature Conservation (SINC); or A regularly occurring, substantial population of a species scarce in the County
Local	Habitats or species populations of value in a local (i.e., within 5 km of the site) context. Habitats of poor to moderate biological diversity e.g., established conifer plantations, species poor hedgerows and un-intensively managed grassland which supports species which are common to the local area and whose loss can be easily mitigated.
Negligible	A habitat which offers little value for nature conservation, e.g., arable field

² CIEEM (2019) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Chartered Institute of Ecology and Environmental Management, Winchester.



4.4

The ecological evaluation of the habitats on site is summarised in Table 3 below. The habitats recorded on the site are relatively common and considered to be of medium ecological value.

Table 3. Summary of Ecological Evaluation of the Habitats on the Site.

Habitat	Reason for Valuation
Low Value	
Bare ground	Provides limited potential for flora and fauna.
Hard standing	Provides limited potential for flora and fauna.
Introduced shrub	Provides limited potential for flora and fauna.
Dense scrub	Provides some potential for fauna. May support low numbers of reptile species. Common habitat type.
Scattered scrub	Provides limited potential for flora and fauna. Common habitat type.
Amenity grassland	Provides limited potential for flora and fauna. Common habitat type.
Semi-improved grassland	Provides limited potential for flora and fauna. Common habitat type.
Moderate Value	
Scattered broadleaved trees	Provides suitable habitat for nesting birds and may potentially support bats. No trees were recorded to have PRFs at time of survey.
Broadleaved woodland	Provides suitable habitat for nesting birds and may potentially support bats. No trees were recorded to have PRFs at time of survey.

Site evaluation

4.5

The key ecological features on site are the buildings, scattered broadleaved trees and the broadleaved woodland. This habitat is considered to be of moderate ecological value at Local level. The remaining habitats, including the semi-improved grassland, are considered to be of low ecological value at Site level.



5

HABITAT CONSTRAINTS

Designated sites

5.1

There is one statutory and 13 non-statutory designated sites within 2km of the application site. The River Taff SINC lies adjacent to the western site boundary. The SINC and the proposed development site are separated by the Cardiff to Merthyr railway line. The area of network rail land between the site and the river is over 30 m wide in places; at its widest point, the distance from the proposed development site to the river is over 60 m. Any proposed development would have no direct impact on the SINC, due to the railway separating the two sites. The proposed development will not have any indirect impact upon the SINC from lighting and disturbance; as currently lighting levels on site are very high because whole areas are lit up with floodlighting. Also the site is currently operational, meaning lorry and other heavy machinery are utilised on site 24hrs a day. The development of the site would allow opportunities to greatly reduce light levels in the area and add more green spaces. Examples of the high light levels on site are shown in the photos below.

5.2

The remaining designated sites consist primarily of designated grassland and woodlands over 0.5 km from site so no direct or indirect impact will occur.

Photo 10: Examples of the high light levels on site.





6

PROTECTED SPECIES CONSTRAINTS

Bats

Building

6.1 Multiple buildings within the site were noted to provide potential for roosting bats as they were in poor condition and contained many gaps and lifted boards. These buildings will require further survey to determine if they support roosting bats.

Trees

6.2 None of the trees within or around the site were noted to have PRFs at the time of survey.

Foraging and commuting habitats

6.3 The site is considered to have low suitability for foraging bats. The vast majority of the site is hard standing and industrial buildings offering negligible foraging potential. The railway line runs the length of the western site boundary, the trees along the railway were removed as part of the electrification of the railway, greatly reducing its foraging and commuting suitability.

6.4 To the east of site is Merthyr Road, one of the main roads into the city centre. Merthyr Road is tree lined, though its foraging potential is limited due to the large surrounding areas of hard standing. The only areas on site where foraging is likely is to the west of the cricket club where the poplar trees and scrub are present, and light pollution is lower. Bat activity surveys will be undertaken to better understand how bats use the proposed development site.

Legislation

6.5 All bat species are fully protected under *The Conservation of Habitats, & Species Regulations (amendment) (EU exit) 2019*. Taken together, this makes it an offence to intentionally or deliberately capture, kill or injure or disturb bats (whether in a roost or not), and intentionally or recklessly damage, destroy or obstruct access to their roosts

Birds

Habitat

6.6 The scattered trees, broadleaved woodland, and dense scrub present around the site boundaries and within the site are considered suitable for common species of nesting birds. Two inactive bird nests were recorded within scattered trees in the site. A gull colony is known to roost on the



roof of the main Hoover factory buildings and high activity was observed at the time of survey. To reduce the potential impact on birds, mitigation measures will be introduced to ensure the conservation of nesting birds. Assuming that the recommended precautionary mitigation measures will be adopted (See section 8: Mitigation), it is not anticipated birds will preclude the sites development.

Legislation

6.7

Birds, their eggs and active nests are protected under the *Wildlife and Countryside Act 1981*, as amended, with the exception of a number of species considered as pests. This protection includes the birds themselves. Their nests are also protected from damage or destruction, both whilst the birds are constructing and using them.

Reptiles

Habitat

6.8

Reptiles prefer to reside in areas with a network of longer vegetation (for cover) adjacent to suitable basking habitat such as shorter vegetation and hard standing. In addition, reptiles like to hibernate in complex structures such as hedge banks, which are sheltered from the elements and less susceptible to fluctuations in weather conditions. Suitable reptile habitat occurs throughout the boundary habitat of the cricket club.

6.9

Based upon the desk study records and the habitats present on site, there is a low possibility of reptiles being present within the boundary vegetation. To reduce the potential impact on reptiles, mitigation measures will be introduced to ensure there conservation (See section 8: Mitigation).

Legislation

6.10

All British reptiles are protected under the *Wildlife & Countryside Act 1981*, as amended, from killing and injury. Following the revision of the UKBAP priority species list in 2007, all native reptile species are now listed as UK priority species.

Otter

Habitat

6.11

Suitable otter habitat (i.e., river and riparian vegetation) occurs off site to the west. The otter habitat is off site so there will be no direct impact on the habitat.

The riparian habitat and the proposed development site are separated by the Cardiff to Merthyr railway line. The disturbance from the running of the trains would prevent otters from establishing holts adjacent to the



railway line. At its widest point there is 46m of riparian habitat for otters to utilise before they come into contact with the railway. The proposed development will not have any indirect impact upon otters from lighting, due to the already high light levels on site; in fact with a sympathetic lighting plan and planting strategy light levels would be reduced.

Legislation

6.12 Otters are fully protected under *The Conservation of Habitats, & Species Regulations (amendment) (EU exit) 2019*. This makes it an offence to intentionally or deliberately capture, kill or injure or disturb otters and intentionally or recklessly damage, destroy or obstruct access to their holts.

Dormice

6.13 There is very limited suitable habitat for dormice present on the site. Very few of the trees present are coppiced, resulting in large canopy gaps. It is considered unlikely that dormice are present within the site. Based upon the desk study records, dormice would not be present on site.

Legislation

6.14 Dormice are fully protected under *The Conservation of Habitats, & Species Regulations (amendment) (EU exit) 2019*. This makes it an offence to intentionally or deliberately capture, kill or injure or disturb dormice and intentionally or recklessly damage, destroy or obstruct access to their nest.

Invertebrates

6.15 The habitats within the site provide suitable habitat to support a range of common and widespread invertebrates.

6.16 Based upon the desk study records and the habitats present on site, the site is considered unlikely to support any large or important populations of notable invertebrate species. No *Devil's-bit-Scabious* (*Succisa pratensis*) or tussocky damp grasslands dominated were found on site, so Marsh Fritillary (*Euphydryas aurinia*) is not considered a constraint.

6.17 Invertebrates are not therefore anticipated to preclude development of the site.

Badger

6.18 Although the badger is not strictly protected under nature conservation legislation, badgers and their setts are nonetheless afforded protection in relation to ill-treatment under the *Protection of Badgers Act 1992*.



6.19 No evidence of badger setts or badger foraging were recorded within the site and the site is considered to have low suitability for badger sets due to its open nature. However, it is possible that badgers occasionally access the site at night to forage.

Wild mammals

6.20 No mammal signs were noted during the survey; however, the site may be used by other wild mammals such as hedgehog, which, in 2007, were added to the UK BAP priority species list, on account of its rapid decline. Based upon the desk study records, other notable species which have been recorded include polecat.

6.21 Wild mammal species are currently given limited protection under the *Wild Mammals (Protection) Act 1996*. This makes it an offence to intentionally cause this species unnecessary suffering by certain methods, including crushing and asphyxiation. To reduce the potential impact on mammals, mitigation measures will be introduced (See section 8: Mitigation).

**7**

RECOMMENDATIONS FOR FURTHER SURVEY

Bats

Trees

7.1 It is recommended that woodland habitat be incorporated into the new design, however if trees are scheduled to be lost, any trees which may be impacted should be inspected for their suitability for bats.

7.2 If trees with High to Moderate bat roost potential are scheduled to be felled and/or subject to surgery, surveys will be necessary to confirm the presence or likely absence of roosting bats. This survey work would encompass detector surveys and possibly a climb and inspect survey, using endoscope and torch, assuming it is safe to do so.

7.3 For trees with Low potential, suitable mitigation may be put in place to ensure no bats are harmed.

Buildings

7.4 Bat emergence surveys will be undertaken to determine if bats are using the building on site; the nature of the potential use and the species of bat. The survey methodology will be in accordance with the Bat Conservation Trust Bat Surveys Good Practice Guidelines³.

7.5 Should bats be identified on-site, the survey findings (i.e., species present, abundance and distribution across the site) would be used to devise a suitable mitigation strategy

Site activity

7.6 A bat activity survey will be undertaken to determine if bats are using the woodland / hedgerows / wall etc; the nature of the potential use and the species of bat. The survey methodology will be in accordance with the Bat Conservation Trust Bat Surveys Good Practice Guidelines.

³ Bat Conservation Trust, 2016. *Bat Surveys: Good Practice Guidelines*. Bat Conservation Trust, London.



8

RECOMMENDATIONS FOR MITIGATION

Breeding bird habitat

8.1

Although it is recommended that every effort be made to design existing habitats into the new development, wherever practicable, the loss of some nesting bird habitat may occur to accommodate the development. It is recommended that clearance of nesting bird habitat should be undertaken in the period August to February inclusive. Should it prove necessary to remove any breeding bird habitat during the breeding season, the area should be checked in advance for the presence of birds' nests. Once checked, if there is no evidence of breeding birds, clearance work should be completed within 48 hours of inspection. If any active nests are found in this area, then works must cease, and an appropriate buffer zone should be established. This buffer must be left intact until it has been confirmed that the young have fledged, and the nest is no longer in use. This applies to vegetation clearance and to any works affecting the Hoover factory buildings which are utilised by gull colonies.

Bat Lighting Mitigation

8.2

The proposed mitigation to prevent impacts to commuting and foraging bats is focused on avoidance of artificial lighting impacts on areas within the site and in the local vicinity that may contain high value bat habitats.

8.3

All lighting on site should be in accordance with the guidance set out in: Bat Conservation Trust and Institute of Lighting Professionals (2018) Guidance Note 08/18: Bats and artificial lighting in the UK. ILP, Rugby.

Wild Mammals

8.4

It is recommended that good building practices are adopted during the construction phase to safeguard any individual animals which venture onto the proposed development area. Such practices would include covering of all deep holes and trenches overnight and/or the provision of planked escape routes for any trapped wildlife.

**Invasive Species**

8.5

Before starting work, measures must be taken to prevent the spread of invasive species like montbretia, Himalayan balsam, and cotoneaster within the site.

Reptiles

8.6

Reptile and amphibians typically hibernate at/or beneath ground level where temperatures are more constant. The majority of on-site reptile habitat will remain intact, that said, the new access route is scheduled to pass through areas of hedge with its adjacent grasslands.

8.7

It is not necessary to entirely and permanently remove reptiles from the site, only to ensure that injury is not caused to individuals by the works. It is likely that reptiles will forage around the Shrubs and scrub around the perimeter of the site.

8.8

A simple means of making the site unsuitable for reptiles is habitat manipulation. All grassy areas suitable for reptile basking and foraging affected by the proposed works (regardless of their location) should be strimmed to ground level (under supervision by a suitably qualified ecologist) to make them unsuitable for reptiles and all suitable refugia removed. A strimming regime over 2 weeks would discourage reptiles from work areas so that they avoid injury during works. Once the area has been strimmed to ground level and all potential refugia removed then reptiles are extremely unlikely to be present in the area and works can proceed.



9

ENHANCEMENT OPPORTUNITIES

Retention of existing habitats

9.1 It is recommended that effort be made to design existing habitats into the new development, as well as the provision of appropriate buffer zones along and around sensitive ecological habitat.

9.2 Scattered trees, broadleaved woodland, mixed woodland, and hedgerows all priority habitats and efforts should be made to incorporate them into the design and minimise potential impacts.

Enhancement

9.3 Measures to enhance the ecological value of the new development include the following:

Mammals and birds

9.4 A total of ten Vivara Pro Build-in WoodStone Bat Boxes or similar will be integrated at the apex into the new walls of the buildings, facing boundary habitat, to allow suitable roosting alternatives for the bats on site. The drawing below shows the location of the bat tubes.

9.5 Bird boxes can be installed on the trees surrounding the site, the final location of any bird boxes will be included in the landscape plan.

9.6 The provision of hedgehog boxes and incorporation of gaps into all ridged boundaries (13 cm x 13 cm) to allow free passage of hedgehogs across the site.

Invertebrates

9.7 It is recommended invert coils be included into any landscape plan. Invertebrate coils are small bound coils of sticks and twigs about the size of a football, that are partially buried within areas of introduced shrubs and act like small beetle banks/insect hotels. These will eventually be colonised by mosses and invertebrates increasing the carrying capacity of the site for invertebrates.

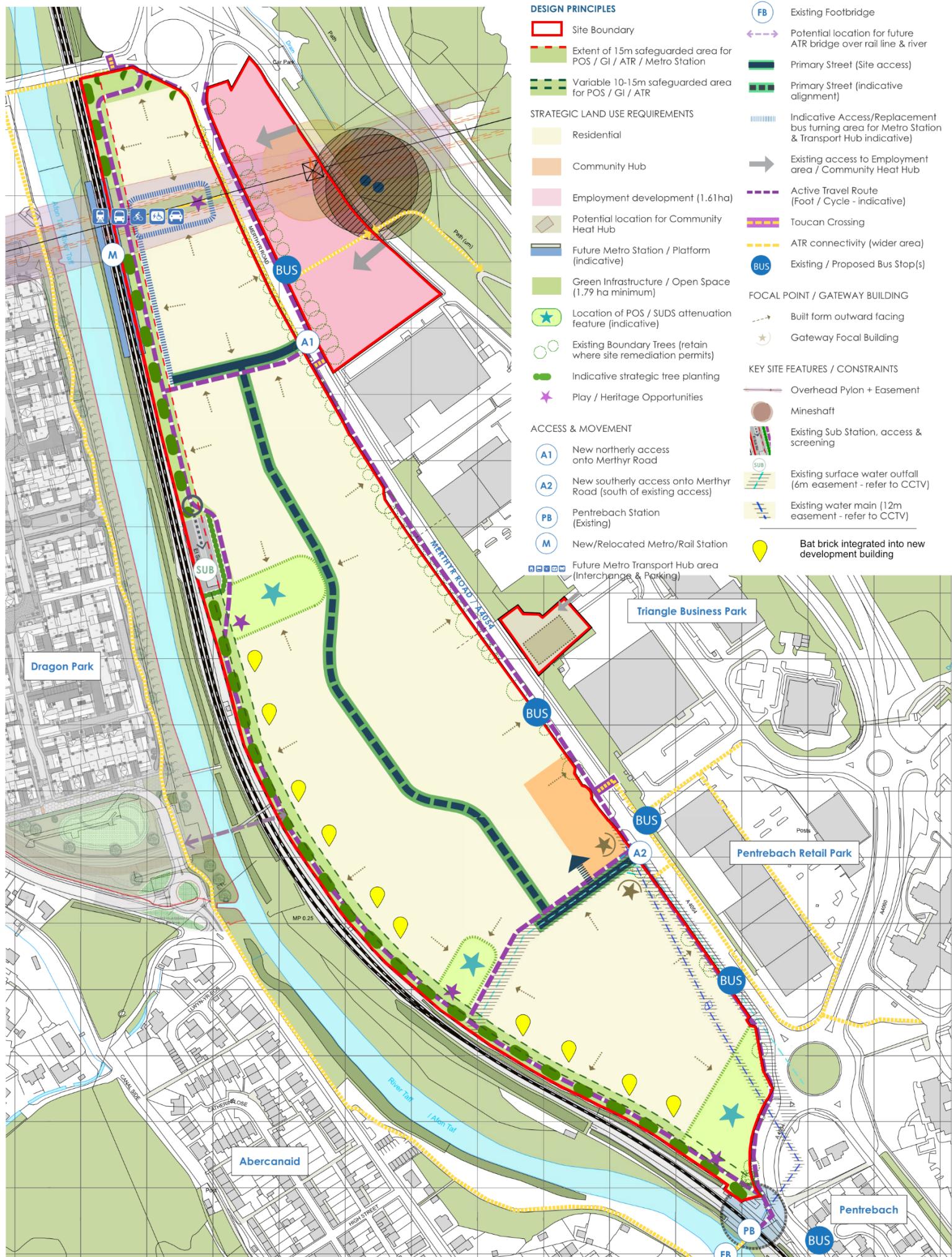
9.8 Wildflowers will be planted to benefit pollinators. Birds foot trefoil and white clover should be planted throughout any new grassy areas. Birds foot trefoil will continue to flower after being mown and offers nectar to honeybees, short tongued bumbles, long tongued bumbles and solitary



bees. White clover will also continue to flower after mowing, it is a good source of pollen for honeybees and supplies nectar to honeybees, short tongued bumbles, long tongued bumbles and solitary bees.

Tree planting and dark wildlife corridors

9.9 The final design for site enhancement (including the location of invert coils, planting strategy and dark corridors) will be included in the final proposed landscape plan.





10 CONCLUSION

10.1 Providing the recommended mitigation measures and surveys are adopted, relevant nature conservation legislation will not be contravened, ecological impacts of the development will be reduced to a minimum and ecological issues are not, based upon the available information, anticipated to preclude the sites development.



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LEGEND

Semi improved grassland	
Amenity grassland	
Hard-standing	
Building	
Dense Scrub	
Introduced shrubs	
Bare ground	
Scattered scrub	
Scattered trees	
Target Note	

HOOVER SITE, MERTHYR TYDFIL

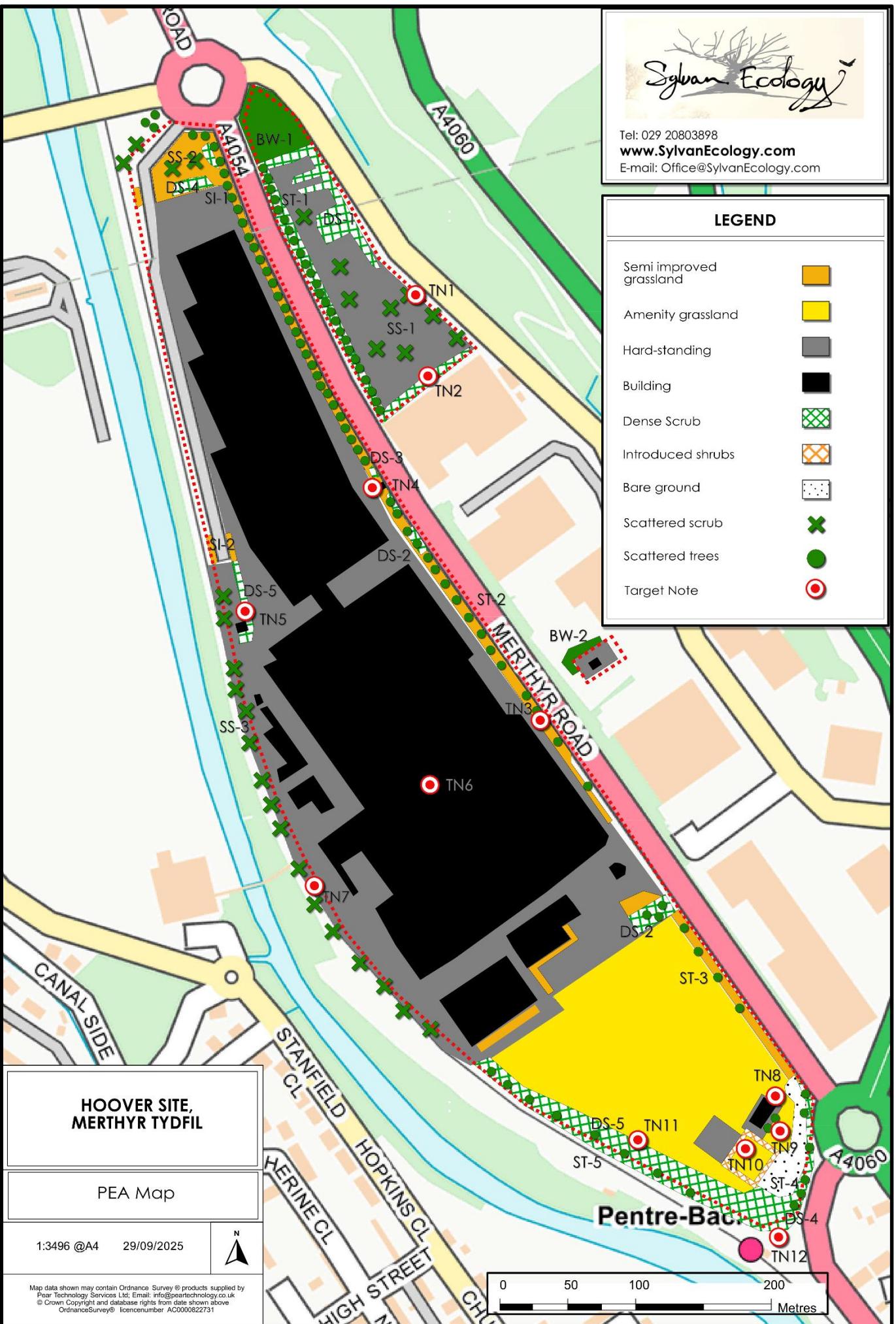
PEA Map

1:3496 @A4 29/09/2025



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