

INTERNAL MEMORANDUM

To: David Cross
From: Ecologist
Ask for: Matt Davies
Ext: 5278
Memo number: 4
Date: 19th June 2020

SUBJECT: P/20/0076 – Plot 4, Land Adjacent to 39 Park Place, Troedyrhiw
(Construction of 2x detached dwellings with garages, 1 granny annex and a bin store).

Update following NRW responses.

1. **Proposed scheme:**

Will be added to the report.

2. **SEWBRcC:**

Will be added to the report.

3. **Tree report:**

Will be added to the report.

4. **SINC buffer**

NRW had no comments regarding the Ancient Woodland element. In terms of the SINC, there will need to be a protective buffer along the boundaries of the site that bound the SINC with appropriate fencing. The buffer will be a minimum of 2m. Within the 2m buffer, a bund (500mm high) will be created with 1.8m close-boarded fence running along the top of the bund. The bund to be seeded with an appropriate wildflower mix to be specified within the ecology report.

5. **Ecologist experience and qualifications**

Will be added to the report.

6. **Lighting**

Apologies if this was unclear – I can see my comment was not worded very well. A lighting plan for all external lighting will be required. The plan is required in order to show consideration for nocturnal species (e.g., bats, dormice, invertebrates). The plan will be submitted for approval by the LPA ecologist prior to determination of planning. The plan will demonstrate that:

- a. the boundary habitat will remain unlit
- b. the bat box entrances will remain unlit
- c. there will be dark flight lines to and from the bat box enhancements
- d. any other onsite lighting conforms to the following guidelines:

- i. <https://cdn.bats.org.uk/pdf/Resources/ilp-guidance-note-8-bats-and-artificial-lighting-compressed.pdf?mtime=20181113114229>

In addition to the plan for the external lighting outlined above, there must be no windows on building elevations near boundaries to prevent illumination of the adjacent SINC habitat.

7. **Fencing:**

Will be added to the report.

8. **Bats:**

I welcome your further comments regarding the onsite building (Building 1). The further information represents the level of clarity of results, photographic evidence and interpretation that I would have expected to see in the original report. Comments can only be made based on the information available.

I will now accept works to be carried out under supervision with a robust method statement in place. A bat method statement will be submitted for approval prior to determination of planning.

NB the following points are still to be addressed.

6.1.4.3 Winter use (page 24) – there is no justification provided for this conclusion. More information is required.

Internal assessment (page 23) – *‘There is no roof space to the annexe type building on the western boundary’*. Is this from another report/site?

9. Birds:

Will be added to the report.

10. Reptiles:

Thanks for your comments. I am still of the view that a reptile presence or likely absence survey is the best course of action for this site. This would allow a population size class assessment of onsite reptiles (if present). Further actions in terms of mitigation, compensation and enhancement could then be appropriately formulated based on the results of the survey.

Without a survey and with a reptile population assumed to be present, I would require a strategy (to be agreed in advance or planning determination) that would either retain habitat onsite, or remove any reptiles present to a suitable offsite receptor site. The onsite area or the receptor site would need to be agreed in advance and also enhanced for reptiles (e.g., management of the site, hibernaculum added) prior commencement of works.

The following still requires addressing:

6.5.1 Summary (page 36) states that ‘No reptile survey was undertaken on the site due to the time of year the visit was carried out’. The site visit was undertaken in May (an optimal month for reptile surveying). This statement therefore needs amending

NB for future reference, the reptile method statement refers to spraying the habitat following clearance. This would not be acceptable – repeated cutting should be used.

11. Dormice:

NRW had no comments to make regarding dormice on this site. No survey work for dormice will therefore be necessary. However, due to the proximity of higher value habitats for dormice to the site, and using the precautionary principle, the mitigation measures as stated within Section 6.2.5 of the ecological report will be undertaken. Clearance work will be undertaken in the active season for dormice (April – November).

12. Hedgehog:

Will be added to the report.

13. Invertebrates:

Again, apologies if my comments were not clear. I would like the adverse impact on invertebrate species to be more thoroughly examined in the report appropriate mitigation/compensation/enhancement measures provided.

14. Compensation:

Will be added to the report.

15. Enhancement:

Will be added to the report.

16. LEEMP:

My comments stated that the information from points 14 and 15 *could* be combined into one document in the form of a LEEMP. This was a suggestion rather than a requirement.

17. Site plan:

To be amended as requested.

18. 5.5.1.3 Ephemeral/Short perennial/bare ground (page 14):

Will be added to the report.

19. Grassland:

Will be added to the report.

20. Species list:

Will be added to the report.

21. Terms

Will be simplified as requested.