

INTERNAL MEMORANDUM

To: Huw Roberts
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 1

Date of Memo #-: -

Date: 28/10/2021

SUBJECT: P/21/0364 | Customer and staff parking area for Merthyr Motor Auctions and associated boundary treatments and hard and soft landscaping | Land North Of Merthyr Motor Auctions Pant Road Pant Merthyr Tydfil CF48 3SH

Comments had already been made at the Pre-App Enquiry stage. Further documentation has now been provided:

1. EcIA of The Hafod, Merthyr Tydfil. Be Ecological Ltd. Issue 1 VA, dated 28/09/21. Date received 18.10.21.
2. Landscape Management Plan. Drawing No. 581/06. Date received 18.10.21.
3. Planting Plan and Schedules Drawing No. 581/04. Date received 18.10.21.
4. General Arrangement Drawing No. 581/01. Date received 18.10.21.
5. Specification, Ground Preparation and Planter Details. Drawing No. 581/05. Date received 18.10.21.
6. Merthyr Motor Auctions, Pant Road, Dowlais, Merthyr Tydfil. Bat Survey of the Hafod, Merthyr Tydfil. BE Ecological. November 2020. Issue 1VC.
7. Lighting Report (2469.R1_13.10.2021). Date received 18.10.21.

Comments below (comments made at Pre-App stage in smaller text).

Section 2.2.1 Desk study, page 4 [Document 1], includes the following sentence:

Please note, the data search was requested for the landholding, not the centre of the site. It is thought that this would cover any species relevant to this site, however, an updated data search will be required prior to full submission.

I'm not sure I understand this comment? Could there please be some clarification?

This statement is still included.

Table 7, page 6 Target note #1 is missing from Figure 3, page 7 [Document 1]?

Not amended.

x6 Replacement Trees have been included on the landscape plans (Documents 2, 3 and 4). Three species have been referred to, two of which are 'Nativars'. These will be replaced by native species. All native species will be of local (if not Welsh) provenance.

Further measures in terms of mitigation, compensation and enhancement for the grassland habitat are therefore required. I would suggest some grassland areas are incorporated around and/or within the site, with appropriate seed mix and maintenance and management measures (with a 5 year plan provided) to benefit pollinators (NB the site is within a Buglife B-Lines area).

4.2.4 refers to grassland enhancement, maintenance and management, addition of seedmix.

Document 1 needs to include all landscaping documents (Documents 2, 3, 4, 5).

Section 4.3.4 Hedges – potential mitigation measures, page 10 [Document 1]

This refers to ‘... a new evergreen hedge ...’. What species is/are proposed?

The landscape plans (Documents 2-5) refer to both a new native hedge and a new evergreen hedge. The species within the new native hedge are acceptable. The species suggested within planters and in the new evergreen hedges – *Thuja plicata* – is non-native. Alternative native species that would do the same job – *Buxus sempervirens* or *Taxus baccata*. Amendments required.

NB All new planting will be native species of local (if not Welsh) provenance.

The landscape plans (Documents 2-5) do not reflect the above and will require amendment. This will include all planting (e.g., hedges, planters, groundcover).

The report [Document 1] does not show the full redline boundary (which extends, for example, northwards from the main body of the site. Has this been fully considered?

No further information on this?

Section 5.1.1 Bats- evaluation, page 11 [Document 1]

This refers to ‘... foraging habitat for bats ...’. Commuting behaviour was also observed during the bat transect surveys.

This has not been amended.

A more detailed Reptile (/Amphibian) Mitigation plan is required (to also include enhancement). [Document 1]

This has been added, However, there is a contradiction in terms of the timing of removal of brash (point 4 ‘*between November and February*’ and point 13 ‘*March-October*’). Also, there is no enhancement.

SEWBRc reference number 0190-241 different to PEA reference 0190-514 [Document 6]? Were two data searches undertaken? Please could there be some clarification?

Clarification still required.

"Dark" corridors are required around entire site. Currently this has only been achieved along the eastern boundary.

The lighting report (2469.R1_15.06.2021) requires an adjustment to demonstrate illuminance of 0.2lux or below on the horizontal plane and below 0.4lux on the vertical plane (<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>) around all boundaries.

Updated lighting report provided (Document 7). The luminaire specification and the lightspill along the northern and eastern boundaries is largely acceptable. A further slight tweak to improve the lightspill along the northern boundary is required.

There is more lightspill at the southern and western boundaries. As Pant Road is already lit with streetlighting and there is a lit carpark to the south of the site, this is not seen as critical, although any improvements that are possible should be considered (see further comment below).

NB are baffles included on the proposed luminaires within the illuminance plans?

Document 7 specifies no baffles. Would the introduction of baffles improve lightspill over the southern boundary?

Lighting will only be acceptable when required - between 8am and 10pm.

This is still a requirement.

NB Documents 2 and 3 seem to include x4 lighting columns (denoted by crossed, orange circles) – x2 on the southern boundary (as specified in the lighting report), but also x2 on the northern boundary. Those on the northern boundary need to be removed.

The redline boundary for the application is not reflected in Document 1 or in the landscaping documents (Documents 2, 3, 4). Is this an issue that requires action? Should there be a redline and a blueline boundary for example?