

INTERNAL MEMORANDUM

To: Kate Glover
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 1

Date of previous memo: -

Date: 02/09/2024

SUBJECT: P/24/0196 | Erection of Hydrogen Electrolyser Plant Facility (8 Megawatts) including associated storage containers, support infrastructure, CCTV, security fence and landscaping. | Land At Pengarnddu Industrial Estate Dowlais Merthyr Tydfil

DESIGNATED SITES WITHIN 500M OF THE APPLICATION SITE

- ✓ Sites of Importance for Nature Conservation (SINC): x3 (closest, Blaenmorlais, c.190m from site)
- ✓ Within a Buglife B-Lines Area:

PRIORITY AND PROTECTED SPECIES WITHIN 500M OF THE APPLICATION SITE

- ✓ Birds (including Schedule 1¹ and Section 7² species);
- ✓ Invertebrates (including Section 7² species)
 - ✓ Marsh fritillary butterfly (Section 7² species), closest record c.629m from site;
- ✓ Mammals
 - ✓ Bats (European protected species³; some Section 7² species) - closest roost record for lesser horseshoe bat, c.1618m from site);
 - ✓ Otter (European protected species³; Section 7² species);
 - ✓ Hedgehog (Section 7² species);
 - ✓ Water vole;
- ✓ Amphibians
 - ✓ Common toad (Section 7² species)

DOCUMENTS SUBMITTED (related to ecology)

1. Dowlais. Preliminary Ecological Appraisal prepared by Western Ecology. Report reference: WOR 4554.2. Date 31st July 2024
2. Dowlais. Green Infrastructure Assessment prepared by Western Ecology. Report reference: WOR 4747.2 Date 31st July 2024

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

³ Conservation of Habitats and Species Regulations 2017 (as amended)

COMMENTS

Document 1

Trees are referred to in Document 1, but Document 2 does not refer to trees being lost as part of the development, only *ephemeral short perennial, semi-improved neutral grassland* and *scattered scrub* habitat. Clarification is required. If trees are to be lost, PPW12 stipulates a replacement ratio of 3 trees for every tree lost (<https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf>, page 159, 6.4.42).

PPW9 is quoted on page 26, however PPW12 is now in force. Please update.

Document 2

The document is titled Green Infrastructure Assessment, but this should be Green Infrastructure Statement (GIS). Please amend.

The GIS:

- o *will describe how green infrastructure has been incorporated into planning proposals;*
- o ***must be used for demonstrating how the step-wise approach has been applied; and***
- o *should highlight baseline data considered and surveys and assessments undertaken, sustainable drainage statements, landscape and ecological management plans etc.*

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.

Any proposed compensation should take account of the DECCA framework.

*NB each stage of the step-wise approach **must be accompanied by a long-term management plan.** The management plan should set out:*

- o *the immediate and ongoing management of the site;*
- o *future monitoring arrangements for all secured measures;*
- o *the funding mechanisms in place to meet the management plan objectives;*
- o *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.*

There are some elements missing from the GIS. Document 2 therefore needs to demonstrate **how the stepwise approach has been applied** and must **be accompanied by a long-term management plan**.

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.

The bee post enhancement would be the better option as it would be within the linear grassland habitat link. Please amend the document to reflect this.

More detail is required regarding the proposed grassland link along the eastern boundary of the main site continuing northwards. How will the species rich tussocky grassland be created and/or enhanced? Overseeding is recommended, but what will the species mix be for example? This information must

demonstrate an overall increase in biodiversity within the sward compared to the current onsite species. This is important particularly given the reduction in habitat area overall post-development.