

INTERNAL MEMORANDUM

To: David Cross
From: Ecologist
Ask for: Matt Davies
Ext: 5278
Memo number: 1
Date: 15th July 2020

SUBJECT: P/20/0121 – LAND TO THE NORTH OF CRABTREE WALK AND TO THE WEST OF SWEETWATER PARK TREFECHAN MERTHYR TYDFIL

(Demolition of bungalow, construction of residential development, landscaping, parking and associated works).

A series of ecological surveys have been undertaken onsite and reports submitted in support of this planning application. See below:

- A. Extended Phase One Ecology Survey. Land at Trefechan. January 2019. Ecological Services Ltd.
- B. Biodiversity Strategy. Proposed residential scheme. Land to the north of Crabtree Walk, Trefechan. 29th October 2019. Ecological Services Ltd.
- C. Bat Scoping Survey. Caerllwyn Bungalow, Trefechan. 24th February 2020. Ecological Services Ltd.

In addition, a related application for proposed highway engineering and access works had been submitted with the following report produced in support:

- D. Situation report – Land off Crabtree Walk, Trefechan. Access Road Application to facilitate future development. 3rd October 2019. Ecological Services Ltd.

NB Ideally, the reports (A-C) would be amalgamated into a single document (an 'Ecological Impact Assessment' as per CIEEM Guidelines). This should include all survey work required, plus all appropriate avoidance, mitigation, compensation and enhancement measures for the site. At present there are discrepancies, for example, both documents A and B outline different enhancement measures. A single document, with a single set of enhancement measures would clarify this. This will also make later assessment of the impacts of the proposed development on the natural features of the site (when the issues set out below have been dealt with) much easier.

The comments that follow are split into those for each document (there may therefore be some repetition).

COMMENTS/ISSUES:

A. Extended Phase One Ecology Survey.

Onsite buildings

At the time of writing (the pre-application stage), the onsite buildings were not included in the planning application and were all to remain.

Badgers

Given the dense bracken reported onsite – there needs to be a line in the report with advice if a badger sett is encountered.

Nesting birds

The habitat is suitable for ground nesting birds. Specific mitigation measures to protect ground nesting birds must be added to the report.

Trees

There are specific trees targeted for removal from site to facilitate the development. More detail of the ground based preliminary roost assessments of these trees (or any trees that require major works) is required including photographs. This is to demonstrate their suitability or otherwise for roosting bats. See also later comments regarding document B.NB the fewest number of trees possible should be removed from site.

Lighting

More information is needed regarding lighting. An onsite lighting plan will be required to be agreed by the LPA ecologist prior to determination of planning. There will need to be dark links created across the site (particularly light averse bat species, for example *Myotis* sp and lesser horseshoe bats were detected during the bat transect surveys – document B). More detailed information regarding the results of the transect survey will be required (see later comments regarding document B) to inform the lighting plan. All onsite lighting will conform to the following guidance note:

<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

Enhancements

In addition to those enhancements already suggested within the documents, integral bat boxes within the building will also be required. All enhancements will be specified (including heights and orientations for the bird and bat boxes) and marked up on all relevant plans submitted for the planning application (as well as included and referred to in the ecological report). The seed mix for the Wildflower borders needs to be specified. In addition, a suitable seed mix for the gardens needs to be specified (see further comments on this in the document B section).

The enhancements specify a 5cm gap under the fence NB this would likely be too low for hedgehogs on its own - 13cm x 13cm gaps at a set distance apart (3m) along all onsite fence lines would be more appropriate for hedgehogs in addition to a 5cm continuous gap at the base of the fence allowing free passage for reptile species.

B. Biodiversity Strategy

Bats

Bat transect survey – pre-app advice requested one transect visit per season (Spring, Summer, Autumn). Only a Summer and Autumn transect was undertaken on site. Further, more detailed information regarding the completed transects is required to include a plan to demonstrate where and when the different bat species were encountered along the transect route. This will be required to fully inform the onsite lighting plan.

This further, more detailed information will determine whether a Spring bat transect survey and static bat detector survey will be required to complete the data set.

NB all required surveys must be completed prior to the determination of planning.

For the full planning application one of the onsite buildings (Caerllwyn Bungalow) and associated outbuildings is earmarked for demolition. A Preliminary Roost Assessment (PRA) for bats and nesting birds of these buildings has been undertaken – see comments regarding this in Section C.

Reptiles

The following amendments to the Reptile Mitigation Plan are required.

Retained onsite areas are specified as being around the northern and western boundaries, however, there also appears to be a retained area at the south eastern corner of the site.

The retained areas should be separated from the construction footprint by reptile-proof fencing and Heras fencing.

All vegetation clearance should be undertaken by hand (using strimmers or brush cutters). In addition, the cuts should be directional, starting within the centre of the site and moving towards the retained areas to the west, north and south east. A plan demonstrating the direction of the cuts will be included.

The dismantling of the dry-stone walls or rubble piles must also be supervised by a suitably qualified and experienced ecologist.

Woodland, Trees & Tree Roots

This section outlines the process for removal of woodland and trees. Those *specific* trees targeted for removal must have a ground level preliminary roost assessment. The report results showing their suitability for roosting bats must be provided along with photographs. See further comments in section A.

Enhancements

See Section A. NB Integral bat boxes will be required in similar numbers to the numbers of bird boxes – 25% of all new onsite properties.

Lighting

See Section A. NB Bat boxes will not be illuminated. There will be dark routes from the bat boxes around and away from the site. A lighting plan must be agreed prior to determination of planning (see further comments within document A section).

Wildflower/grass seed mixes

An appropriate seed mix for the wildflower are must be specified. The garden areas of the properties will require an appropriate grass seed mix that both most closely matches the existing grassland and introduces other appropriate species by way of

enhancement. The seed mixes will be detailed within the Habitat Management Plan (see below).

Habitat Management Plan (HMP)

The HMP will detail all vegetation to remain on site together with all new planting. The plan will cover measures for planting and establishment of new planting and maintenance and management of all onsite vegetation (both existing vegetation to remain and new planting) for a period of 5 years.

The HMP must be submitted and agreed by the LPA ecologist and landscape architect prior to determination of planning. This will be a condition of the planning permission (if granted).

Data records

All data for species recorded on site will be submitted to SEWBRcC.

C. Bat scoping survey

There is no discussion regarding local bat records. This needs to be rectified.

Whilst the survey classed the building as having negligible suitability for roosting bats, there are still some PRFs. In addition, the outbuildings have suitability, not only for day roosting bats, but also as night roosts that might be used for example by brown-long eared bats and lesser horseshoe bats – both species picked up during the bat transect surveys – see document B).

Therefore, a single bat activity survey of the buildings and the outbuildings is required. In addition, static detectors will be deployed within the outbuildings for 10 consecutive nights.

This will be required prior to determination of planning.