

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 3
Date of previous memo: 27/11/2023
Date: 08/01/2024

SUBJECT: P/23/0197 | Proposed residential development (42 dwellings) with new access | Land Adjoining (South Of) Swansea Road To The East Of Waunbant Court And North West Of Old Winchfawr Road Swansea Road Merthyr Tydfil

The following documents have been submitted in relation to the above named site and planning application:

1. Swansea Road, Merthyr Tydfil. Ecological Impact Assessment, V3. Ethos Environmental Planning. **December 2023.**

REQUIREMENTS

LEMP

A detailed Landscape and Ecological Management Plan (LEMP) will be required (secured via an appropriately worded planning condition requiring written approval from the LPA ecologist for discharge).

The LEMP must be agreed in writing by the LPA ecologist prior to commencement of any onsite works.

All species must be native and of local, if not Welsh or UK, provenance.

Details included within Document 1 will require amendment within the LEMP – see below:

- Balance between *acid grassland* and *dwarf shrub heath* change significantly comparing pre-construction to post-construction areas. This is due to a proposed approximate 183% increase in the area of *acid grassland* habitat and a proposed approximate 53% decrease in *dwarf heath shrub* habitat.

This must be adjusted, so there is no loss of dwarf heath shrub habitat.

- There is a proposed approximate 59.86% decrease in onsite *woodland*. This needs to be improved.
- There is also a 100% loss of *neutral grassland*. The garden lawn habitat must be factored in to compensate in some way for the loss of this grassland, using a species mix that would respond well to regular mowing. The following are examples of seed mix that can be used:

1. [EL1 Flowering Lawn Mixture - Emorsgate Seeds \(wildseed.co.uk\)](https://www.wildseed.co.uk/flowering-lawn-mixture)
 2. <https://www.johnchamberswildflowers.co.uk/wildflower-seeds-mixes/80-grass-seed-mixes/heritage-flowering-lawn-80-grass-seed-wildflower-mix>
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3. <https://wildflowerlawnsandmeadows.com/product/wild-flower-lawn-seed-mix/>
(or equivalent)

- The compensation measures for the *acid grassland* and dwarf shrub heath habitats as set out in summary on pages 48 and 49 of Document 1 are acceptable in principle, with the following caveat – these habitats will be monitored, managed and maintained for a period of 10 years following the completion of the restoration. *NB this must also be a requirement for **all new habitat** created onsite.* Full details will be included within the LEMP.
- The Restoration of the *acid grassland* and *dwarf shrub heath* habitats and compensation for the loss of the *woodland* habitat must be undertaken and completed ‘post-stabilisation works’, but ‘pre-commencement of construction’. A timetable of works must reflect this.

The LEMP must also include details of the Enhancement measures as set out in Section 7 of Document 1, page 52.

CEMP

A detailed Construction Environmental Management Plan (CEMP) will be required (secured via an appropriately worded planning condition requiring written approval from the LPA ecologist for discharge).

This will include, but not be limited to the following:

- Measures to protect nearby SINC sites as referred to on page 43 of Document 1.
- Precautionary working method statement for hedgehog.
- Method statement for the protection of nesting birds.
- Stipulations regarding lighting ‘during construction’ (any lighting must conform to <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>
- A detailed reptile mitigation plan. NB the conclusion of the assessment of reptile mitigation options (Appendix 2, Document 1) is acceptable, i.e., Site C as the most suitable as a receptor site. NB enhancements to the receptor site (as set out on page 71 of Document 1) must be in place prior to the commencement of translocation from the construction site.

LIGHTING

A detailed lighting plan for all proposed new lighting (external *and* internal) will be required (secured via an appropriately worded planning condition requiring written approval from the LPA ecologist for discharge).

This will be informed by the bat transect and automated/static detector surveys. Dark routes for commuting and foraging bats will be maintained as well as dark routes to and from bat boxes. Horizontal and vertical illuminance plans illustrating the light spill of proposed lighting will be required. In general, lighting must only be used where and when necessary. All lighting will conform to the following guidelines:

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

Areas designed to support invertebrates post-development will also be required to be dark.

INNS (Invasive Non-Native Species)

A method statement will be required (secured via an appropriately worded planning condition requiring written approval from the LPA ecologist for discharge).

This will outline the treatment and disposal of onsite Japanese knotweed (JKW) following *'The Knotweed Code of Practice; managing Japanese knotweed on development sites'*. Professional INNS removal specialists will be commissioned to produce the method statement and to treat and dispose of the JKW.

ENHANCEMENTS

The Enhancement measures (Section 7 of Document 1, page 52) **must be marked on all relevant architect drawings/plans elevations for the scheme**. This can be secured via an appropriately worded planning condition requiring written approval from the LPA ecologist for discharge.

MONITORING and COMPLIANCE

The Monitoring and Compliance measures as set out within Section 8, page 53 of Document 1 will be followed. *NB changes will be needed here to reflect the required 10 year monitoring, management and maintenance of all newly created onsite habitats (following the completion of the restoration/compensation works)*. This will be secured via an appropriately worded planning condition requiring written approval from the LPA ecologist for discharge.
