

INTERNAL MEMORANDUM

To: Caroline Pulley
From: Ecologist
Ask for: Matt Davies
Ext: 5278
Memo number: 2i
Date: 22nd June 2020

SUBJECT: P/20/0109 | Land at Pant Industrial Estate Pant Merthyr Tydfil

(Erection of industrial units (Use Classes B1, B2, B8) and associated works).

An ecological appraisal of the site has been undertaken by BE ECOLOGICAL Ltd and dated January 2020. Comments regarding this below:

Birds

- Were any birds heard or seen during the survey? Details required.

Bats

- Lighting – The site itself is moderately lit at present (radiance levels on site are stand at $6.01 \times 10^{-9} \text{ W cm}^{-2} \times \text{sr}$ – www.lightpollutionmap.info). There is no current onsite lighting, so it can be assumed that the radiance level is due to street lighting around the site and the lighting of buildings on adjacent plots. The site is within c.500m of areas to the north with much lower radiance levels ($<2 \times 10^{-9} \text{ W cm}^{-2} \times \text{sr}$). Lighting on site must conform to the latest guidelines (<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>), for instance LED luminaires to be used, with a warm white spectrum (ideally $<2700\text{Kelvin}$) and bollard-style or low-level downward directional luminaires used in the car parking areas. Further details can be found in the guidelines. A lighting plan outlining the lighting positions and specification to be used is required. This will be of benefit, not only to bats, but also to local insect populations (with a wider knock-on benefit for ecosystems).
- Basements – As issue highlighted by the applicant's ecologist. Determination of the application cannot take place before it is resolved. Firstly, certain questions need to be answered:
 - Are there basements present?
 - Is there access for bats into these basements?

If the answer to both questions is yes, further evaluation/survey work for bats will be required prior to determination.

Reptiles

- The report assumes a small population of reptiles on site (optimal habitat, but disturbed and isolated).
- A reptile mitigation strategy is proposed with habitat manipulation designed to encourage any reptiles onsite into a receptor area to the east of the site. This is a much smaller area where there may already be a population and therefore there would be more limited resources post-development. Does the applicant own the adjacent land? What is planned in the future for this area? Will it remain and be available of wildlife or is it too to be developed at some point. If it is soon to be developed, this approach would just postpone the problem regarding reptiles. If no development is planned, can the area be guaranteed to remain for a certain length of time (5 or 10 years?).

- A variation of this strategy could be the following - to use habitat manipulation to encourage any reptiles that may be present into a proportion of the site that would be left uncut, for example 10% of the site.

Areas surrounding the uncut area would then either be made unsuitable for reptiles (vegetation removed in stages, ultimately down to bare ground) or the uncut area would be fenced off. This is designed to encourage reptiles into and to remain within the uncut area. Artificial refugia could then be deployed within the uncut area and reptiles captured and removed to the receptor area to the east of the site (if within the ownership of the applicant). Either this, or a fingertip search of the uncut area could be employed to locate and capture reptiles.

If it became apparent that the population was larger than had been assumed (e.g., >30 reptiles) an alternative receptor site would then be required. This receptor site should be identified before the strategy commences, so that there will be no delay if larger numbers of reptiles are found.

For clarity, following the removal of any reptiles, the uncut area could then be cut and stripped to facilitate the proposed development.

Invertebrates

- More consideration for the impact of the project on invertebrates is required, both in terms of direct loss of habitat and due to increased lighting on site post development. Mitigation, compensation and enhancement measures must also be considered.
- Many of the species of flora listed onsite are foodplants for a range of invertebrate species and whilst some may not be priority species they are still valuable in terms of overall biodiversity. In addition, there is at least one plant species that is important for a priority species - creeping cinquefoil is the larval foodplant of the Grizzled Skipper (a Section 7 species under the Environment (Wales) Act 2016)

Enhancement measures

- Enhancement features/measures need to be definite, with specifications and marked on all relevant plans submitted for the application. Bat and bird boxes, reptile hibernaculum, planting – all need to be defined and include all the detail needed to implement the measures.
- A compliance check will be required with e-mail confirmation to the LPA ecologist that all enhancement measures have been satisfactorily installed following the completion of the development.

General

- 2.3, page 8 – Planning Policy Wales is now Edition 10, December 2018.
- Survey dates confusing within the report
 - 4.32, page 14. Survey date 5th February 2020
 - 4.3.2, also page 14. Survey date December 2019

I assume the Dec 2019 date needs amending.

- SEWBReC unique reference number required.
- 5.2.8, page 25. *'It is not certain at this time how much, if any, of the woodland on the southern boundary will be cleared or cut back.'* Figure 3, page 16 does not show any woodland habitat to be present on the site. Is this reference to woodland an error?
- APPENDIX D shows 2x target notes. The target note symbols on the plan in Figure 3, page 16 are out of focus and cannot be read. In addition, some areas on the plan have not been mapped.

