

INTERNAL MEMORANDUM

To: David Cross
From: Ecologist
Ask for: Matt Davies
Ext: 5278
Memo number: 2
Date: 22nd May 2020

SUBJECT: P/20/0076 – Plot 4, Land Adjacent to 39 Park Place, Troedyrhiw
(Construction of 2x detached dwellings with garages, 1 granny annex and a bin store).

Previous comments requested the following:

A daytime Preliminary Ecological Appraisal (PEA) to include a Preliminary Roost Assessment (PRA) of the existing onsite structures – undertaken by a suitably qualified ecologist – is required in order to investigate any impacts of the works on priority and protected species and/or habitats and inform whether further surveys are necessary. Appropriate mitigation and compensation measures will be required along with enhancement of the site (in accordance with the Environment (Wales) Act 2016).

An Aderyn data search from SEWBReC is required (Package C 2km).

An Ecological Appraisal report (BE ECOLOGICAL LTD) dated May 2020.

Comments regarding this report:

1. Proposed scheme:

A layout drawing of the proposed development scheme is referred to within the ecological report. This drawing plus any other that are relevant should feature within the ecological report. Enhancement features (e.g., bat boxes, bird boxes etc) need to be definitive and clearly marked on the drawings (NB the fence mentioned with the ecological report is not shown on this drawing).

2. SEWBReC:

There is no unique SEWBReC reference number quoted within the report. This needs to be added.

3. Tree report:

The Tree report needs to be referenced within the Ecological report. All tree protection instructions within the Tree report will be followed.

4. SINC buffer

Whilst the Tree report is designed to ensure no damage to trees due to the development, it does not address the proximity of the development site to the SINC. There will need to be a protective buffer along the boundaries that bound the SINC.

NRW mapping also shows the southeastern and northeastern sections of the site to be within a RAWS – Restored Ancient Woodland Site. Planning Policy Wales 10 (November 2018) 6.4.26 states where woodland sites are recorded on the Ancient Woodland Inventory, authorities should consider the advice of NRW. Planning authorities should also have regard to the Ancient Tree Inventory. NRW should therefore be consulted regarding the Ancient Woodland proximity on the site. This can be undertaken at the same time as consulting NRW regarding dormice

(see point 11).

5. Ecologist experience and qualifications

There is no information outlining the experience and qualifications of the ecologists named within the report. This needs to be added.

6. Lighting Plan

This will show consideration for nocturnal species (e.g., bats, dormice, invertebrates) be submitted for approval by the LPA ecologist prior demonstrating that:

- a. the boundary habitat will remain unlit
- b. the bat box entrances will remain unlit
- c. there will be dark flight lines to and from the bat box enhancements
- d. any other onsite lighting conforms to the following guidelines:
 - i. <https://cdn.bats.org.uk/pdf/Resources/ilp-guidance-note-8-bats-and-artificial-lighting-compressed.pdf?mtime=20181113114229>
- e. there must be no windows on building elevations near boundaries to prevent illumination of the adjacent SINC habitat.

7. Fencing:

4.1.1.4 Glamorganshire Canal Woodlands – mitigation measures (page 10) mentions fencing off the development, but there is not enough detail (fencing type, height, a plan showing the positioning of the fence etc). This is required.

8. Bats:

There are two onsite structures. Building 1 (a former stable) is described as having potential as roosting habitat, but that this potential had been greatly reduced due to the building '*not having a roof*'. Later in the document on page 23, under the description for Building 1 it says '*The vast majority of the roof has been removed/fallen in on this building and so the roof is currently just sat/balanced on the wall plates. The building is single skinned and there are no cavities within the brick work. The wall plates are exposed. The whole building is extremely exposed to the elements.*' However, Plates 5 and 6 do not appear to reflect this description. There is no picture of the whole of the roof structure taken from above. I am not convinced that the building is of negligible ecological value. In my experience, bats will roost on the wall tops of this type of structure. In addition, there is potential suitability as a night-roost with any droppings easily missed in amongst the clutter of items seemingly stored within the structure. This, along with the proximity of the structure to dark commuting routes and valuable foraging habitat brings me to the conclusion that further survey work is necessary to rule out the use of Building 1 by bats. A single dusk or dawn activity survey is required prior to determination of this application, in addition to an automated/static activity survey with a detector deployed within the building for 10 consecutive nights within the active season. This survey work is also likely to provide information about the general use of the site and its boundaries by bats.

6.1.4.3 Winter use (page 24) – there is no justification provided for this conclusion. More information is required.

Internal assessment (page 23) – '*There is no roof space to the annexe type building on the western boundary*'. Is this from another report/site?

9. Birds:

There is no information within the report regarding birds encountered (seen or heard) onsite during the Ecological Assessment. Given the presence of scrub and woodland habitat it would be normal for a bird list to be compiled. Can this please

be supplied? This information regarding birds either on or nearby the site would allow appropriate mitigation/compensation/enhancement to be specified.

10. Reptiles:

6.5.1 Summary (page 36) states that 'No reptile survey was undertaken on the site due to the time of year the visit was carried out'. The site visit was undertaken in May (an optimal month for reptile surveying). This statement therefore needs amending.

The Ecological Assessment describes the onsite habitat as optimal for reptile species, advocates assuming reptile presence and recommends the use of a reptile method statement (pages 65-67). All reptile habitat is to be removed from the site with none retained. The method statement appears to be designed to encourage reptiles offsite in a south easterly direction towards the SINC woodland habitat. This strategy would only be acceptable if reptiles could be encouraged offsite into:

- a) suitable reptile habitat that was large enough to accommodate further reptile numbers
- b) unsuitable habitat that could be enhanced for reptiles.

Neither scenario is possible on this site. With the removal of the onsite suitable habitat, there is nowhere for reptiles to go.

A reptile survey is therefore required to establish presence or likely absence and then (if present) to allow a broad estimate of numbers. Translocation offsite to nearby suitable habitat (as described in a) and b) above) will then be required.

NB for future reference, the reptile method statement refers to spraying the habitat following clearance. This would not be acceptable – repeated cutting should be used.

11. Dormice:

6.2.1 Summary (page 26) describes the scrub onsite to be limited and relatively sparse. This is not borne out by the photographic evidence provided in Appendix A. The scrub habitat appears to be, not only dense, but linked to the adjacent woodland. The report states that the surrounding woodland habitat is suitable for dormice. It therefore follows that if dormice are present within the woodland, they would be likely to use the linked onsite scrub. Therefore, there may be an adverse impact on dormice. As dormice are a European Protected species a consultation with NRW is appropriate in this instance.

12. Hedgehog:

There is no mention within the Ecological report of hedgehog. The habitat on and adjacent to the site is suitable. Information is required within the report and appropriate mitigation/compensation/enhancement measures specified and marked on the plans for the site. For example: gaps (13cm x13cm) will be created at the bases of fences at the site boundaries to allow passage of hedgehogs across the site. Cautious working will be undertaken when clearing the site to prevent killing or injury to this species.

13. Invertebrates:

Much of the onsite habitat is suitable for a range of invertebrate species. For example, many of the species reported to be present onsite are larval foodplants for butterflies and moths – see table below for a few examples:

Larval foodplant	Butterfly or Moth Species	Found in local records search
Ash	Centre-barred Sallow Coronet	Coronet
Birch spp	Lesser Swallow Prominent Grey Dagger	

	Vapourer	
Bramble	Peach Blossom Buff Arches	
Cock's-foot	Essex Skipper Large Skipper Marbled White Meadow Brown Ringlet Speckled Wood Wall	Wall
Broad-leaved dock	Small Copper	
Grey Willow	Purple Empress	
Red Fescue	Grayling Marbled White	Grayling
Meadow Foxtail	Essex Skipper Small Skipper	
Common Bird's Foot Trefoil	Clouded Yellow Common Blue Cryptic Wood White Dingy Skipper Green Hairstreak Short-tailed Blue Silver-studded Blue Wood White	Green Hairstreak Dingy Skipper
Clovers	Clouded Yellow Pale Clouded Yellow	
Ribwort Plantain	Glanville Fritillary Heath Fritillary	
Pedunculate Oak	Purple Hairstreak	Purple Hairstreak
Oak, Quercus spp	Merville du Jour Oak Beauty December Moth	
Ivy	Double-striped Old Lady	

As all the onsite habitat is proposed to be removed, more information is therefore required to evaluate the adverse impact on invertebrate species and provide appropriate mitigation/compensation/enhancement measures.

14. Compensation:

A post-habitat landscaping plan is required to be submitted for approval. This will include (but not be limited to) provision of scrub &/or shrub habitats, grass and wildflower areas to benefit pollinators.

15. Enhancement:

Enhancement features (e.g., bat boxes, bird boxes, reptile hibernacula, gaps in fences for hedgehogs) are recommended and suggested within the report. This needs to be more specific:

- a. Types of boxes
- b. Numbers of boxes
- c. Installation instructions including for example height, orientation, and position on buildings
- d. Plans of the development should be marked up with the positioning of all enhancement measures and resubmitted in support of the application. These plans should then be included in the ecological report.

16. LEEMP:

The landscaping plan and enhancement features could be combined within a single document (a Landscaping and Ecological Enhancement Management Plan

or LEEMP).

17. Site plan:

This should use the mapping colour codes from the Handbook for Phase 1 habitat survey (JNCC). The plan seems to be unfinished with much of the habitats not mapped plus there is no redline boundary.

18. 5.5.1.3 Ephemeral/Short perennial/bare ground (page 14):

There is a line here that appears to suggest that the diversity of herbs and grasses found means that the habitat is of low ecological interest. If the habitat is biodiverse, then it cannot be of low ecological interest. This needs re-wording.

19. Grassland:

From the evidence of the supplied photographs, the site appears to have some areas of well-established grassland rather than early successional habitat. This needs to be reflected in the report.

20. Species list:

Appendix D comprises a species list for the site. Species should be referred to within the results section of the report to illustrate and provide the evidence base for the habitat-types identified.

Some of the species listed are not specific, for example ragwort (there are several possible species), *Achillea* (this could be Yarrow or Sneezewort).

NB the species records include a reference to '*woodland buttercup thing*'. I assume this meant to be identified further. This report needs to be amended with the correct identification.

17. In Sections 5 and 6, I find some of the terms used in the impact assessment a little confusing. For example, terms like '*slight*' and '*neutral*' are used and phrases such as '*an uncertain short term medium term adverse impact*'. If these are to be used in reports they need to be better defined/explained or preferably just simplified.