

INTERNAL MEMORANDUM

To: Caroline Pulley
From: Ecologist/Countryside Officer
Ask for: Matt Davies
Ext: 5278
Memo number: 3
Date: 26/07/2019

SUBJECT: P/19/0069 2 PLYMOUTH HOUSE, MILBOURNE TERRACE, MERTHYR TYDFIL, CF47 0UL

- Please also refer to previous comments for this application.
- Previous comments asked for the following:

*As it appears that the majority of the current onsite habitat is to be removed, a **Preliminary Ecological Appraisal (PEA)** undertaken by a suitably qualified ecologist is required. This will aim to provide sufficient information to fully assess the potential ecological impacts of the proposed development, and to identify whether further surveys are required, or to establish the need for, and extent of, any mitigation or compensation measures needed as part of the proposed development.*

*NB the PEA should include a **Preliminary Roost Assessment (PRA)** of Plymouth House, as any bat roosts that may be present in the main house could be impacted by the adjacent proposed development.*

A Preliminary Ecological Appraisal (PEA) report has now been supplied, however, this report does not include a PRA of Plymouth House as requested above. Bat roosts (if present) within the onsite building may require the onsite tree cover to ensure continued roost viability and functionality.

I have the following observations regarding the submitted PEA report:

1. An onsite building (timber-framed corrugated metal field shelter) was referred to in the results section. There is no indication, either within the results, or elsewhere in the report of whether this structure was surveyed and if there was any suitability for roosting bats (structures such as this are frequently used by certain species of bats as night roosts).
2. Preliminary Ground Level Roost Assessments (PGLRA) were undertaken of the onsite trees that would be impacted by the proposed development. A total of 9 trees were assessed. This is at odds with the submitted arboricultural report where a total of 11 trees and 2 'groups of trees' are reported (although the 'groups' of trees appear to be outside of the site).
Question: have all the relevant trees been assessed?
3. The table within the results section includes photographs of the trees assessed, but there are no close-up photographs of the noted tree features. Photographs illustrating these features are required.
4. Comments in Section 5 (Conclusion) regarding upward-facing potential roost features. Bats are known to sometimes use these types of features and I think

that some of the onsite trees with features may therefore actually be of moderate rather than low suitability. As such, these trees should be subject to further Potential Roost Feature Inspection surveys prior to any works.

5. There is a statement within the report that *'Bats are likely to use the western and southern boundaries of the site for foraging and commuting. These areas are behind the close board fencing (outside of client's ownership) and will be retained in their entirety.'* It must also be the case that bats would also use the onsite trees for foraging and commuting. This needs to be considered in relation to the removal of the trees.
6. The report states that *'The field survey looked at the development area itself and up to 50m from the site boundaries.'* Preliminary Ground Level Roost Assessments should also therefore have been undertaken of the trees behind the close board fencing. Any bat roosts present within these trees may be impacted by the proposed development.
7. The methodology for the PGLRAs is in the results section rather than the methodology section. There is no methodology for the desk study and no mention of SEWBReC. Please could this be added to the report and the SEWBReC unique reference number stated?
8. Para 4.5.2.9 states that there was no evidence of breeding birds within the 'building' on the site (does this refer to the 'timber-framed corrugated metal field shelter'?). Was there any evidence of breeding birds in any onsite vegetation and / or trees? What bird species were noted during the survey?
9. The conclusion is that the site is of generally low ecological value. I cannot agree with this statement – the site has mature woodland trees onsite, which offer an important commuting and foraging resource for bat species. There are also in my view some opportunities for roosting bats within the trees. The onsite vegetation is suitable for nesting bird species. The site is also suitable for reptile species. The statement needs to be revised.
10. Proposed enhancement measures (bat and bird boxes) must be illustrated on the architectural plans.
11. A lighting plan demonstrating consideration for nocturnal species must be submitted with the application.
12. Reptiles – the report concludes that the site may accommodate a small population of reptiles. This is a reasonable assumption and a Reptile Mitigation Strategy (Reptile Method Statement) is appropriate in this instance.
13. Reptile Method Statement should be re-named Reptile and Nesting Bird Method Statement.
14. Will any of the existing suitable reptile habitat remain onsite following the works? If so, an area such as this should be separated off by reptile-proof barriers (with gaps provided under boundary fencing for offsite reptile dispersal) to be used as a receptor area. Any reptiles found during the works that may be in danger of injury and/or killing could then be translocated to the onsite receptor area. NB the proposed hibernaculum could be sited within the receptor area. A plan showing the position of the receptor area and hibernaculum within in should be provided.
15. If large numbers of reptiles are found, an offsite receptor area should be suggested to be agreed by the LA Ecologist.
16. The method statement refers to Figure 3 for the directional cut, but the figure is missing.
17. The report does not have a PEA plan – this needs to be added.

18. The report does not include plans of the proposed development (please also refer to point 10).

I am of the opinion that the onsite trees are a valuable ecological resource. Trees of this age cannot be easily replaced and certainly not in the short to medium term. In my view the development should be reassessed and planned around retention of these trees.