

INTERNAL MEMORANDUM

To: Caroline Pulley
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 5
Date: 19th March 2021

SUBJECT: P/20/0242 | PROPOSED NEW DWELLING, COMMERCIAL BOARDING KENNEL AND BARN CONVERSION TO HOLIDAY LET | LAND AT BRYN-RHEDYN FARM BEDLINOG CF46 6UF

The following reports have been submitted in support of the above planning application:

- *Bryn-Rhedyn Farm, Bedlinog. Bat and Nesting Bird Survey Report. 20 January 2021. Revision 3.0*
- *Bryn-Rhedyn Farm, Bedlinog. Preliminary Ecological Appraisal. 25 January 2021. Revision 1.0*

Comments from previous memo (#4) in **bold**. New comments in **green**.

- **PRA report now acceptable.**
- If there is to be external lighting, a lighting plan must be submitted (this can be a condition of the planning permission) and will be required prior to commencement of works.
Do you know what's happening with this Caroline?
- All ecological compensation and enhancement measures must be marked up on all relevant plans/elevations submitted in support of the planning application (as previously stipulated). This includes the hedgerow, the bat boxes in the trees and the building plus the sparrow terrace. These plans must either be included or referred to within the report.

Re - the Schwegler 1FR bat tube proposed to be incorporated into the building - the elevation must be specified within the report (similarly for the sparrow terrace).

This has now been included in the report and the ecologist has marked up a plan. These enhancement measures must be added into all relevant plans/elevations submitted in support of the planning application, i.e., the architects drawing/plans.

Has this been completed?

- PEA report (as detailed above) now submitted:
 - **More interpretation required in the light of the appropriate data search.**
 - **The applicant must supply the ecologist with details of the exact habitat to be impacted by the development in order that they may fine tune interpretation. For example, notwithstanding the lack of records for common dormouse and the relatively poor habitat on site, there is still some suitability for this species. Therefore, a precautionary approach to removal of small amounts of habitat suitable for dormice would be**

appropriate. This might include a method statement and ecological supervision.

- Access road:
 - Planning Policy Wales (PPW) Edition 11 - 24th Feb 2021 states that planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly **avoided**, then minimized, mitigated, and as a last resort compensated for; enhancement must be secured wherever possible. The first priority for planning authorities is to **avoid** damage to biodiversity and ecosystem functioning. Where there may be harmful environmental effects, planning authorities will need to be satisfied that any reasonable alternative sites that would result in less harm, no harm or gain have been fully considered.
This policy is mirrored within the MTCBC Replacement Local Development Plan (2016-2031) - Policy EnW1: Nature Conservation and Ecosystem Resilience.
 - The route of the access road, as proposed, is within Cwm Bargod SINC and would therefore have negative impacts. Therefore, the scheme in its current form is not acceptable. Other options need to be explored that would **avoid** this, as per PPW 2021.
- Other enhancement measures to strengthen the boundary features with infill planting (native species of local or at least Welsh provenance) are required. This would benefit a range of species including foraging and commuting local bat populations.
- Lighting – if any external lighting is proposed – it must conform to <https://cdn.bats.org.uk/pdf/Resources/ilp-guidance-note-8-bats-and-artificial-lighting-compressed.pdf?mtime=20181113114229&focal=none> (this must be stated within the PEA report. A lighting plan demonstrating consideration for nocturnal species must be submitted.
- Any proposed fencing would need gaps (13cm x 13cm) for the free passage of hedgehogs.
- A PEA report is used to identify further ecological surveys necessary to inform an EclA, to identify ecological constraints to a project and make recommendations for design changes, and to highlight opportunities for ecological enhancement. It can be used as a scoping report (for non-EIA projects), but should not be submitted as part of a planning application unless it can be determined that the project would have no significant ecological effects, no mitigation is required and no further surveys are necessary; with the exception of such cases it should be superseded by an EclA.