

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1
Date of previous memo: -
Date: 25/08/2023

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, V1. Ethos Environmental Planning. June 2023.
2. Swansea Road Development. Landscape Strategy LA.1. 3 August 2023. TC23125_Landscape Plans v9.dwg. Tir Collective Landscape Architects.
3. Swansea Road Development. Planting Plan LA.2. 3 August 2023. TC23125_Landscape Plans v9.dwg. Tir Collective Landscape Architects.
4. Swansea Road Development. Planting Plan LA.3. 3 August 2023. TC23125_Landscape Plans v9.dwg. Tir Collective Landscape Architects.
5. Swansea Road, Gellideg. Tree Survey, Categorisation & Constraints Report. Dated 23/05/2023. Steve Ambler and Sons Tree Specialists Ltd.

COMMENTS

Document 1

The layout plan referred to within this document appears to be a previous version. The latest layout/site plan must be included so that any recommendations and avoidance, mitigation, compensation, and enhancement measures can be specific.

Page 3 – SUMMARY:

NERC Habitats are referred to here and also elsewhere within the report. The NERC Act has been superseded by the Environment (Wales) Act 2016. Amendments required.

Off-site compensation measures for habitats and invertebrates are referred to here, but are not explored within the wider report. Details are required please. MVH controls land within MTCB including highly managed grassland – this could be used as part of this off-site compensation.

Page 8, 2.2.2

Minor point – date of the MTNRAP is incorrect – should be 2019-2024

Page 10, 3.2 Desk Study

Please can the unique reference number for the SEWBReC data search be added into the report?

Page 11, 3.5 Section 7 Species

Page 28, 4.3 Section 7 species

Odd that only certain Section 7 species have been referred to here?

Page 13, Reptiles

Page 32, 4.9 Reptiles

The reptile presence or likely absence survey was undertaken at a sub-optimal time of year (June and July 2018). In addition, the first two survey visits were undertaken at temperatures >20°C. The level of survey effort (seven visits) given the sub-optimal conditions is not sufficient to be confident of the nil result. In addition, this survey work is now out-of-date (5 years old).

The reptile presence or likely absence survey will need to be repeated in at an optimal time of year (earliest opportunity would be September 2023) in order to confirm or refute the results of the sub-optimal out-of-date survey. The results of this survey are required prior to determination.

Page 14, 3.13.1

'The site was assessed as providing suitable habitat to support a variety of invertebrate species, including those which may be notable or of conservation importance. As such, targeted invertebrate surveys were commissioned by Ethos. These were carried out by Christian Owen of Christian Owen Bio-Surveys (see appendix 6).'

Can the results of the targeted invertebrate surveys please be supplied and interpreted in the context of the site and the development?

Page 27, Japanese knotweed

Japanese knotweed (JKW) onsite will be disposed of following 'The Knotweed Code of Practice; managing Japanese knotweed on development sites'. Professional INNS removal specialists will be used to eradicate the JKW. A method statement will be supplied for written approval by the LPA.

Page 30, 4.6.2

The new waterway recently installed only the eastern boundary (referenced within Document 5 is not mentioned).

Page 30, 4.7.4

Overall, considering the urban context, habitats present and links to wider habitats, it was assessed that the site provided 'moderate potential' for bats in line with BCT survey guidelines: "continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water."

Collins 2016¹ Guidelines on the number of bat activity surveys to achieve reasonable survey effort in relation to habitat suitability for foraging and commuting bats:

Table 8.3 Guidelines on the number of bat activity surveys recommended to achieve a reasonable survey effort in relation to habitat suitability.			
Survey type	Low suitability habitat for bats ^a	Moderate suitability habitat for bats	High suitability habitat for bats
Transect/spot count/timed search surveys	One survey visit ^b per season (spring – April/May, summer – June/July/August, autumn – September/October) ^c in appropriate weather conditions for bats Further surveys may be required if these survey visits reveal higher levels of bat activity than predicted by habitat alone	One survey visit ^b per month (April to October) ^c in appropriate weather conditions for bats. At least one of the surveys should comprise dusk and pre-dawn (or dusk to dawn) within one 24-hour period.	Up to two survey visits ^b per month (April to October) ^c in appropriate weather conditions for bats. At least one of the surveys should comprise dusk and pre-dawn (or dusk to dawn) within one 24-hour period.
	AND		
Automated/static bat detector surveys ^d	One location per transect, data to be collected on five consecutive nights per season (spring – April/May, summer – June/July/August, autumn – September/October) ^c in appropriate weather conditions for bats	Two locations per transect, data to be collected on five consecutive nights per month (April to October) ^c in appropriate weather conditions for bats	Three locations per transect, data to be collected on five consecutive nights per month (April to October) ^c in appropriate weather conditions for bats

This survey work is required prior to determination.

Page 39, 6.3.1

‘A small area of the heathland within the mosaic on site will be lost to allow development. This habitat loss will be permanent and is unavoidable to facilitate the proposed development. It will therefore not be possible to mitigate for this during the construction phase.’

Can more detail please be supplied? What proportion of the total existing heathland habitat will be lost? Where is it? Can a plan be provided to illustrate the amount and position of habitat that would be lost?

Retained habitats must have buffer zones and be classified as Wildlife Protection Zones that will be inaccessible to the public. These must therefore be fenced off on all sides. These will be managed in an appropriate manner by MVH. A management plan (LEMP) will be provided, which will be followed in perpetuity.

A detailed lighting plan for all proposed new lighting (internal and external) will be required. 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 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/>

A Construction Environmental Management Plan (CEMP) will be required prior to determination, to include measures to protect retained onsite and offsite habitats during construction.

¹ Collins, J. (ed.) 02016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London.

A detailed Landscape and Ecological Management Plan (LEMP) is required prior to determination.

Full details of all enhancement measures (models of boxes) must be supplied and must be clearly marked on all relevant architects' drawings, plans and elevations prior to determination.

Integrated bird and bat boxes will be included in the property designs: (8x integrated sparrow terraces / 9x further integrated bird boxes (3 for each of 3 species – house martin, swift and starling / 8x integrated bat boxes).

Other enhancements will include, but not be limited to, bee bricks integrated into buildings, insect hotels within development footprint.

Documents 2, 3 and 4

All species must be native and of local, if not Welsh or UK, provenance. Amendments are therefore required. This must include any lawned garden areas. The following are examples of seed mix that can be used:

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

(or equivalent)
