

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1
Date of previous memo: -
Date: 04/10/2023

SUBJECT: P/23/0208 | Construction of mountain bike trails, access trails and uplift track extension and amendments. | Gethin Woodland Centre A470 Pentrebach To Rhydycar Northbound Abercanaid Merthyr Tydfil CF48 1YZ

Documents submitted in support of the application:

- A. Ecological Survey Report for the Provision of New Bike Trails at Bike Park Wales Site, Gethin Forest. Ref HE/35/2023. Hawkeswood Ecology. Dated April 2023.
 - a. Appendix 1 Photographs
- B. Arboricultural Implications Assessment Arboricultural Method Statement. Treecare Consulting

COMMENTS

- 1. As the landowner, NRW will need to be consulted regarding this application.
- 2. Has an up-to-date biodiversity data search been undertaken? This is required.
- 3. There have been issues with silt/run off in Webber's Pond originating from the existing trails, tracks and roads on the site. This is likely to be exacerbated with the proposed increase in bike trails. There may also be implications for the Nant Graig and potentially the River Taff.
- 4. The increase in trails, tracks and roads will also mean an increase in water run off causing erosion of soils and this may have implications, e.g., for the onsite Sitka Spruce. This species is already liable to windthrow on upland sites because of shallow development of roots in unfavourable soil conditions and soil erosion has the potential to make this more likely.
- 5. The topsoil disturbance produced in creation of the new trails and tracks (together with soil erosion, as above) will release carbon. In UK woodlands, 75% of the total carbon stock is in the soil and, on average, the top 1 metre of soils in UK woodlands contain three quarters of the 'in-forest' carbon stock. Furthermore, excavated soil if then exposed to air or water, will produce much higher carbon emissions.

The issues highlighted in points 3-5 must be considered – e.g., how can these things (silt run-off/soil erosion/carbon release) be mitigated and compensated for?

6. Some of the proposed trails are to run through areas of ancient woodland and ffridd, which as Document A states are key features and of national importance. The proposed trails and tracks should be redesigned to avoid these areas. NB trails and tracks planned through Sitka Spruce plantation areas would have less impact.
7. Document B concerns just one of the uplift tracks (Road A as referred to in Document A). Is there a wider ranging tree survey report?
8. Enhancement is required in line with the Environment (Wales) Act 2016 and Welsh Government Circular 'Securing Biodiversity Enhancements' sent to Heads of planning in October 2019.

Document A (e.g., summary, page 4 and paras 7.3 + 7.4, page 28) refers to an opportunity for a potential long term enhancement plan.

'Summary: NRW will change the designation of the woodland from a productive commercial forest within the bike park area (approx. 700 acres) thus no longer commercially logging and restocking the area if a new lease is approved and the trails go ahead. Over the longer term this has enormous benefits for the currently isolated areas of ASNW present on Site allowing the potential for the whole Site to recover to broad leaved/mixed woodland and a long term recovery of soils and ground flora to occur and increase connectivity across the area.

7.3 The opportunity to remove the Bike Park Wales area from commercial forestry offers a long term opportunity to allow recolonisation of ancient woodland species across the Site, reducing and reversing fragmentation and allowing transport of species across the Site during changing climatic conditions.

7.4 Removing the Site from commercial forestry will also allow management to focus on environmentally beneficial activities in woodland management that can work alongside the trail network. Bike Park Wales should consult on suitable operations with a suitably experienced ecologist on management measures that will improve the biodiversity value and ecological resilience of the Site long term.'

A detailed long-term plan is therefore required that would conceivably need to cover many future decades.

9. There must be no artificial light at night and no night-time use of trails, tracks and roads in order to ensure the habitats remain dark. This would need to be a condition of planning permission (if granted).
10. A detailed Landscape and Ecological Management Plan (LEMP) will be needed for the newly proposed trails, tracks and roads. This will need to set out how ecological protection, mitigation, compensation and enhancement measures relating to the project will be implemented, managed and monitored for at least 25 years post-development.
11. Nightjar. Comments made in Document A (pages 19 and 20) regarding nightjar are shown below:

6.26 In 2016 it was concluded that the primary bird species of concern potentially affected by the development of bike trails would be nightjar. Figures given for distance for disturbance of nightjar vary between accounts with Currie & Elliott (1997) suggesting a working distance for foresters of 50 – 250 m, but a later study by Ruddock and Whitfield (2007) suggesting that disturbance occurs at a lower threshold, 50 - 100 metres during chick rearing, but at a maximum of 10 metres when sitting on eggs. The latter authors also infer that although the bird may remain static, they may have been disturbed but relying on their cryptic plumage for camouflage.

6.27 The highest density of new tracks is in the lower downhill section where nightjar are unlikely to be present. With regrowth of the spruce on the plateau at the top of the hill, it is considered that suitable nesting areas on the Site are now virtually absent. Should the proposals proceed and the forest area be withdrawn as a productive commercial forest, it is likely that there will not be suitable breeding conditions for nightjar on Site in the future. The continuation of commercial forestry practices in the local wider area will continue to provide suitable nest sites for nightjar and as such it is no longer considered a Key Feature of the Site.

Onsite avoidance, mitigation, compensation and enhancement measures for nightjar is required. Offsite forestry practices (outside of the applicant's control) providing continued suitable habitat for breeding nightjar cannot be relied upon.

12. Given the area of the site as a whole, should there be an EIA (under Tourism and Leisure)?
13. Other possible wider considerations – archaeology, increase in traffic?