

INTERNAL MEMORANDUM

To: Caroline Pulley
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 2
Date of Memo #1: 17/05/2021
Date: 06/09/2021

SUBJECT: P/21/0170 | DEMOLITION OF INDUSTRIAL BUILDINGS AND ERECTION OF 14 DWELLINGS AND 6 APARTMENTS (OUTLINE) | BRYNTAF GARAGE 105 BRYNTAF ABERFAN MERTHYR TYDFIL CF48 4PJ

Reports submitted in support of the above application:

1. Preliminary Ecological Appraisal. Bryntaf Garage. Sylvan Ecology (for JT Planning). Document number J022- PEA Report-V1.1. Issue date 13/08/21.
2. Protected Species Report. Bryntaf Garage. Sylvan Ecology (for JT Planning). Document number J022- Eco Report-V1.3. Issue date 13/08/21.

Comments:

Document #1

Para 1.2 – mentions Abergavenny. In addition, grid reference and postcode are incorrect (please amend).

Para 2.6 – refers to the use of DAFOR (nothing in, for example, para 3.11 or elsewhere to reflect this)

Para 2.8 – states that incidental records of fauna were made during the survey (para 3.18 states – no fauna noted on site). I would expect at least, for example, some birds to have been seen or heard during the survey and noted, even if these were off site.

Para 2.9 – points out a standard limitation to this type of survey, i.e., they are not always undertaken at an optimal time for botanical recording. However, a reptile presence or likely absence survey was undertaken later in the season (in June and July), *which offered an opportunity to add to the botanical data for the site.*

Para 3.13 – mentions a pond and a manor house – can this paragraph be reviewed and amended where required please?

Para 3.19 – TN5: this woodland does not lie within the SINC designation. This needs amending.

Paras 7.2, 7.3, 7.4, 7.5 – enhancement measures must be fully specified and marked up on all relevant plans/drawings. NB given the amount of houses proposed, one bat box and one bird box is insufficient – boxes must be integrated within the buildings.

Nothing in the report regarding impacts on invertebrates through for example, removal of the onsite grassland habitat.

No mention of bird species potentially nesting in the nearby cliff face.

All enhancement measures must be fully specified and marked on all relevant plans and drawings relating to the proposed development.

Document #2

Typo on title page. Also, should really say SPECIES rather than SPP.

Para 1.7 – only mentions TAN5. This should be expanded to cover National and Local planning policies.

Para 1.8 – again, this includes incorrect site location information. Please amend.

Bats

Para 2.16 – if hibernation cannot be ruled out, then demolition of the building cannot be undertaken within the hibernation season.

The cliff face has been stated to have low suitability, however it has not had a dedicated bat activity survey. Bat surveys were undertaken of the buildings, but not the cliff face. This is required.

Para 2.17 – a single bat box is insufficient to (a) compensate for the loss of roosting opportunities due to the removal of the onsite buildings and (b) enhance the site for bats.

A lighting plan is required to assess the impacts of proposed external and internal* onsite lighting. Horizontal and vertical illuminance plans will be provided. The analysis will need to demonstrate dark flight lines for commuting and foraging bats as well as dark routes to and from the integrated bat boxes.

*given the number of windows within the design, light spill is likely to be substantial and mitigation will be required.

Paras 2.18-2.22 – The following guidelines need to be referred to:

<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

All measures within the linked document to mitigate for the impacts of lighting will be adhered to. Examples include:

- *All luminaires should lack UV elements when manufactured. Metal halide, fluorescent sources should not be used.*
- *LED luminaires should be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.*
- *A warm white spectrum (ideally <2700Kelvin) should be adopted to reduce blue light component.*
- *Luminaires should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone, 2012).*
- *Along 'dark' flight lines, illuminance must be below 0.2lux on the horizontal plane and below 0.4lux on the vertical plane.*

Reptiles

Para 3.7 – ‘The survey visits were conducted during the optimum time of year to identify reptile presence ...’. Optimal survey periods for reptile surveying (during the active season) are the months of April, May and September. June and July are therefore suboptimal.

No refugia were placed within the scrub and semi-improved grassland mapped to the north of the site. However, as the report states, this area will remain untouched by the proposed development and so the omission is justifiable.

Given the concerns of local residents and the reports of slow worm presence in nearby gardens, a precautionary reptile mitigation strategy will be submitted to ensure habitat (including brash and rubble piles) is removed sensitively and in a way that would prevent killing or injury of reptiles in the unlikely event they are present during clearance.

Other issues

There are opportunities for enhancement of the site in terms of landscaping. A Landscape Management Plan would be required to demonstrate this. Native species of local provenance will be used and the plan should cover at least 5 years post-construction.

The following is proposed:

‘Hawthorn hedging or similar to foot of the cliff to absorb potential falling debris from the cliff edge above and keep residents away.’ See Drawing Number A100, dated 2020-04-10.

This seems insufficient in my view, with no details regarding the width of the hedging and with the hedging seemingly within the gardens of each property, separated by fencing of each garden. This would leave residents free to remove the hedging if they so wished. A wider buffer would be better here, fenced off from the gardens and with a wider range of native species (of local provenance).