

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 2
Date of previous memo: 04/10/2023
Date: 12/12/2023

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

Document submitted in response to LPA Ecologist comments (memo #1, 04/10/2023):

- C. Letter. Reference UG1232 from Adam Thomas (Planner with The Urbanists)

Documents received in response to Natural Resources Wales (NRW) consultation:

- D. NRW Consultation Response. CAS-222309-H7R7. Date: 08 August 2023
- E. NRW Consultation Response. CAS-222309-H7R7. Date: 11 August 2023
- F. NRW Consultation Response. CAS-237034-V7Z4. Date: 28 September 2023

COMMENTS + QUESTIONS

- 1. Document D outlines some follow on advice – see below:

Please note, part of the application site (the most northern proposed trail) is within 265m of the Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI). We are likely to have additional advice in relation to potential impacts on the SSSI, but unfortunately, we are unable to provide these within the current timescale. We will provide this additional advice within the next seven working days.

Was this follow on advice provided? Document E deals with pollution prevention, but this does not seem to be specifically talk about the SSSI, but rather relates to watercourses. Can this please be clarified with NRW?

- 2. Document F sets out a Condition (*Condition 1*) designed to ensure necessary management measures are agreed and implemented for the protection of great crested newt and of the environment during construction.

For preference, the CEMP would be submitted for consideration prior to determination.

3. Document C contends that the following issues would/could be addressed via a (33 year) lease agreement that includes changes to the woodland management approach undertaken by NRW:
 - Runoff / Erosion
 - Top soil / Carbon Storage
 - Ancient Semi-Natural Woodland, Sitka Spruce plantations, and other trees

The lease agreement must be submitted prior to determination for consideration. There must also be an acknowledgement from NRW regarding the lease agreement. The lease agreement must include full details of the changes in management practices over the period in question and evidence of how these change in management will positively impact the issues as set out in the bulleted list above. The proposed new management approach would conceivably need to cover many future decades.

If acceptable, this would then provide appropriate enhancement (in line with the Environment (Wales) Act 2016 and Welsh Government Circular 'Securing Biodiversity Enhancements' sent to Heads of planning in October 2019).

In addition, it would be useful if NRW also confirm that they specifically have no objections to the trails proposed to run through the ASNW and ffridd areas and considering the inevitable disruption of ancient woodland soils. NB 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*.

4. 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? How will the routes of the trails be established on the ground? Will an arboriculturalist be commissioned to set out appropriate distances from onsite trees? This is particularly important in areas of ancient woodland. Could this information also be added into the lease agreement (see point 3)?
5. Document C also refers to a suitable assessment by Natural Resources Wales standard models regarding acceptable fall risks.

Please can details of this assessment be provided?

6. Monitoring and management – cumulatively the edges of the new trails, tracks and roads will form important linear sections of connected habitat post-development.

Document C states that *"The area for such management and monitoring would essentially be the tracks themselves and immediately adjacent areas; the core areas. As such, those activities would be relatively small in area, and linear in nature, and so easy to enact by staff."*

As stated within Document C, the enactment of management of these habitat edges would be easy for BPW staff, however the management activities must be provided within a Landscape and Ecological Management Plan (LEMP) 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 the lifetime of the development.

This can be the subject of an appropriately-worded pre-commencement planning condition. Approval from the LPA ecologist will be required to discharge the condition.

7. Has an up-to-date biodiversity data search been undertaken? This is required.
8. It is noted that Document C states there will be no lighting. However, as a precaution, the following will still be required. Condition of planning permission (if granted) -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.
9. Nightjar. Point 3 refers to the lease agreement that includes changes to the woodland management approach undertaken by NRW. This change in woodland management approach could include an element of compensation and enhancement measures for nightjar. This could easily be included as part of the lease agreement.