

INTERNAL MEMORANDUM

To: Caroline Pulley
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 2
Date of previous memo: 16/11/2021
Date: 17/01/2022

SUBJECT: P/21/0388 | Proposed dwelling at 2 Carn Gwilym Goch, Cefn Coed, Merthyr Tydfil

Previous comments in italics below:

Aerial photography show the site to consist of grassland and scrub. There is nearby agricultural and common land together with woodland, grassland, scrub, wooded river corridor and garden habitats.

The proposed scheme will impact the onsite habitat.

Designated sites within 500m of the application site:

- Sites of Importance for Nature Conservation (SINC): x3 (**closest – Cilsanws Common South, which bounds the site along the north eastern site boundary**);
- Ancient Semi Natural Woodland (ASNW): x4;
- Restored Ancient Woodland Site (RAWS): x1;
- Within a Buglife B-Lines Area.

Priority and protected species within 500m of the application site:

- Birds (including Schedule 1¹ species);
- Invertebrates (**including marsh fritillary butterfly – closest record, c. 189m from site – and other Section 7² species**);
- Bats (**closest roost records for brown long-eared bat, common pipistrelle, soprano pipistrelle, c.85m from site. Other species within the records include Daubenton's bat and noctule**);
- Otter;
- Badger;
- Hedgehog;
- Reptiles;
- Amphibians;
- Vascular plants (including Section 7² species).

A Preliminary Ecological Appraisal (PEA) undertaken by a suitably qualified and experienced ecologist is required. This must provide sufficient information for the local planning authority to assess any potential adverse impacts of the proposed development on priority and protected species and/or habitats, or to identify what further information is required before a full assessment is possible.

The results of the PEA will be used to inform whether further surveys are required, or to establish the need for and extent of any mitigation and compensation measures required as part of the proposed development.

An Aderyn data search is required from SEWBReC (Package C 2km).

There will need to be enhancement of the site in line with the Environment (Wales) Act 2016.

NB the PEA 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 or scheme 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 Ecological Impact Assessment (EclA) Report (non-EIA).

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

Report subsequently submitted in support of the application:

- Ecological Assessment. Land at Carn Gwilym Goch, Merthyr Tydfil. Issue 1. VB. May 2021.

Comments:

The photographs are not labelled and do not give an overall sense of the site. More photographs and information required.

A brief site visit, identified a relatively open carpeted area of moss onsite. This is not mentioned in the report, but seems to be shown in the final image of Appendix A. There is one single reference within the Species List in Appendix D - 'springy turf moss' – were there a range of species onsite? On the brief site visit I noticed there was a feather-moss (perhaps 'neat feather-moss'). This may perhaps need a re-evaluation and a target note.

All mitigation, compensation and enhancement measures (for bats, birds, reptiles, invertebrates etc) must be fully specified and explained within the report text and shown on all relevant plans/drawings submitted in support of the scheme.

What habitat will remain onsite? What habitat will need to be removed to facilitate the development? Will there be a 'total site strip' or is 'vegetation clearance to be kept to a minimum'? Both referred to within the report.

A Landscape and Ecological Management Plan required to include, for example, bat boxes, bird boxes, new planting etc. NB only native species will be used – resultant habitat must compensate for species lost and benefit, birds, bats, reptiles, invertebrates etc. Devil's bit scabious should be considered for inclusion to provide stepping-stone habitat for Marsh Fritillary butterfly. The Landscape Plan will therefore be produced in liaison with the ecologist. This is required prior to determination.

A buffer needs is required protect the adjacent SINC habitat (Cilsanws Common South), which bounds the site along the north eastern site boundary. The dimensions and ecological make-up of the buffer will be specified.

More information is required regarding which areas are proposed to be kept dark. A plan showing these areas is required.