

Ecology & Landscape Addendum

PROJECT TITLE: Proposed School Development

SITE ADDRESS : Land off Goitre Lane, Gurnos, Merthyr Tydfil CF47 9SA

PLANNING REF: P/24/0034

DATE: 9th May 2024

A suite of ecology and landscape documents have been submitted to inform a planning application to create a new school within a parcel of land to the north of Goitre Lane, Gurnos, Merthyr Tydfil. Documents of relevance are:

- *'Bats & Trees Survey Report; Goitre Field School, Merthyr Tydfil'* V2 dated 1st March 2024 by Ecological Services Ltd
- *'Updated Preliminary Ecological Assessment; Goitre Field School'* V3 dated 13th December 2023
- *'Reptile Survey Report; Goitre Field School, Merthyr Tydfil'* V3 dated 13th December 2023
- *'Invertebrate Survey Report; Goitre Field - Merthyr'*) Christian Owen Bio-Surveys (dated October 2022)
- *'Arboricultural Report Including Tree Survey Data & Tree Constraints Plan, Arboricultural Impact Assessment, Tree Protection Plan and Arboricultural Method Statement'* dated 8th April 2024 by ArbTS
- *'Ecological Impact Assessment; Land to the North of Goitre Lane, Gurnos, Merthyr Tydfil'* V2 dated 8th May 2024 by Ecological Services Ltd
- 26CB01-SBC-00-XX-DR-L-0400 rev P02 *'Strategic Soft Landscape Plan'* by Soltys Brewster
- 26CB01-SBC-00-XX-DR-L-0402 rev P03 *'West off-site Habitat Compensation Sketch Design'* by Soltys Brewster
- 26CB01-SBC-00-XX-DR-L-0403 rev P02 *'South off-site Habitat Compensation Sketch Design'* by Soltys Brewster
- *'Green Infrastructure Statement'* rev F by Soltys Brewster

As part of the planning application process comments have been received by the County Ecologist for Merthyr Tydfil County Borough Council (MTCBC). Memo 2, dated 29th April 2024 make a series of comments on the ecology and landscape information submitted. This document aims to provide further clarity on the information supplied and to help address the comments made by the County Ecologist.

A) Detail the species found only within the redline boundary, rather than the wider greenling boundary

A botanical assessment of the land within the red line boundary only has not been undertaken. All botanical survey work was undertaken while plans for the development site and wider land were being discussed and formalised. A Preliminary Ecological Assessment (PEA) is a broad habitat assessment and does not aim to identify each species within each habitat type. Therefore the number of species identified, even if the survey work only covered the land within the red line boundary, would be an estimate.

A table is provided in section 4.6 of the Ecological Impact Assessment (EclA). The number of each species present in each habitat type within the red line boundary has been estimated using information from the PEA report.

B) Detail the areas of each habitat type and the species found within each habitat type (within the redline boundary), i.e., marshy grassland, neutral semi-natural improved grassland etc

A table is provided in section 4.6 of the Ecological Impact Assessment (EclA) which details the approximate areas of each habitat type pre and post development.

C) Ensure currently present onsite species are also present post-development and ensure the species mix is also supplemented to improve overall biodiversity.

It is not possible to find a seed mix that contains the species currently on site. Effort has been made to choose a seed mix with native species aimed at each habitat type to be created. Securing suitable on-going habitat management will allow species within the seed bank to establish. Thus it is felt that the current proposed species mixes are suitable.

D) Improve the off-site areas (western and southern) by ensuring the species present are protected, whilst being supplemented/enhanced by further species.

Two additional tables have been provided within section 4.6 of the EclA to demonstrate the approximate habitat areas and species present pre and post development.

Cambria engineers have confirmed that the purpose of the newly created swale is to daylight an existing damaged culvert which runs through the site and re-direct flows to support the construction of the primary school. The development site is prone to unstable groundwater areas. The exiting watercourse in the south off-site compensation area will remain untouched. The new swale will direct flow into the culvert that the current watercourse also uses.

E) Demonstrate Net Benefit for Biodiversity (NBB) with reference to DECCA

Based on the qualitative analysis within the updated Green Infrastructure Statement (Rev F), a Net Benefit for Biodiversity has been achieved on the scheme. The proposals will establish new habitat types to the site such as hedgerow, woodland and ponding which will increase the diversity of habitats currently available. Furthermore, these new habitats (particularly new hedgerows) will significantly increase habitat connectivity within the immediate vicinity of the development. Losses of existing grassland will be mitigated as far as possible by meadow grassland seeding and the enhancement of existing grassland off-site with wildflower plug planting. Ecologically sensitive management of grassland areas alongside the establishment of new habitats and sustainable drainage systems will improve the condition, diversity and resilience of ecological resources within the site over time.

F) Ensure appropriate and fully funded long-term management and protection of the onsite and the offsite habitats.

The development site and off-site compensation areas will all remain within the ownership of MTCBC. Clarification will be required from the council as to which department will

manage the development site and each off-site compensation areas. These details will be required as part of any Landscape and Ecology Management Plan and it is strongly recommended that discussion between relevant council departments is undertaken as soon as possible.

Each council department that manages each parcel of land will need to agree to long term management which includes making sure the machinery is available to undertake work, staff are available to complete tasks at the allotted time and that funding of this work is budgeted.

Details of the maintenance regime will be subject to these discussions, with the aspiration being a landscape that is maintained in an ecologically-sensitive manner.

G) All onsite species must be native species of local (if not Welsh or UK) provenance.

The request for all onsite species to be native species (of local provenance, let alone UK provenance) is unrealistic and would not be suitable for the needs of a primary school. The shrub and perennial planting in the vicinity of the school needs to be attractive year-round, be safe for pupils, have low maintenance needs to keep the planting looking tidy, and provide biodiversity benefits. It would be very difficult to create a planting scheme that fits all of these attributes by solely using native species. Non-native species can provide valuable resources for wildlife across all seasons and in some cases will be more resilient to effects of climate change on our weather patterns (e.g. drought tolerant). A focus has been on including plants that are particularly beneficial for wildlife: 43 out of 64 species of trees/hedges/shrubs/perennials that are proposed are either native or an RHS Plant for Pollinators. The wildflower meadow mixes are also native.

A query is raised within the memo if the development is wholly exceptional and justifiable within the context of Chapter 6 of Planning Policy Wales.

It is noted that Goetre Primary School is also a housing allocation for 120 homes. The development of this site could not come forward firstly without the relocation of the school.

This planning application for the new school could therefore be considered partly an enabling proposal for the redevelopment of the current school grounds for residential dwellings. It is noted that at 120 homes the housing allocation is the fifth largest allocation within the RLDP period and contributes significant to the delivery of homes in Merthyr. The Goetre Primary School site appears much more suitable for residential development than the Pen Y Dre Fields allocation as is more well connected to existing residential development and provides a continuation in the built form.

Given the land take associated with a new school grounds and considering the catchment area associated with Goetre Primary School it is clear that the only suitable site for the new school is the site included within this application. As above the site forms a logical extension to the current education use at Pen Y Dre High School.

In considering the above it is clear that the development of the new Goetre Primary School would have many benefits including providing a 21st century education facility and allow a housing allocation of 120 homes to come forward.

The memo requests additional information to be provided prior to determination of the planning application but does advise a number of planning conditions maybe acceptable. A summary of the additional information requested and the design team response is provided below:

- **Biodiversity enhancements shown on plans** - The architectural drawings have been updated to show the locations of bat and bird boxes as suggested in the EcIA. The location of a reptile hibernacula is shown on plan 26CB01-SBC-00-XX-DR-L-0403 rev P02 '*South off-site Habitat Compensation Sketch Design*' by Soltys Brewster. The location of the butterfly bank is shown on plan. 26CB01-SBC-00-XX-DR-L-0402 rev P03 '*West off-site Habitat Compensation Sketch Design*' by Soltys Brewster. A boundary treatment plan is not available at this stage but notes will be added to ensure access features for small animals are provided within fencing designs.
- **Lighting** - A suitably worded condition requesting lighting information and details is considered an acceptable compromise.
- **Landscaping, Habitat & Ecology Scheme** - A suitably worded condition requesting information relevant to this document is considered an acceptable compromise. As

stated in section F of this document internal discussions with departments for MTCBC are required to address some aspects of this document.

- **Construction Environmental Management Plan - Biodiversity (CEMP-B)** - The design team would like to provide a document that addresses the requirements of the CEMP-B, Invasive Non-Native Species working method statement (INNS-WMS) and Precautionary Working Method Statement (PWMS) prior to determination of the planning application.