

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1
Date of previous memo: -
Date: 26/09/2022

SUBJECT: P/22/0237 | Variation of conditions 3 (Coal Extraction) and 4 (Final Restoration) of planning permission APP/U6925/A/10/2129921 to extend the life of the existing mine for a further 9 months | Ffos Y Fran Land Reclamation Scheme East Of A4060 Slip Road Merthyr Tydfil

Comments:

The conclusion of the Ecology chapter (#15) of the Environmental Statement Addendum (SLR Ref: 419.08882.00002 Version No: FINAL August 2022) is a reasonable one, i.e., the nine month extension of activities is unlikely to alter the potential impacts of the scheme on ecology as set out in the original ES chapter. However, there are some caveats and questions concerning this statement:

Caveats:

1. Biodiversity data search has not been updated. This is required, if only for comparison purposes with previous data searches for the surrounding area undertaken at the beginning of the scheme.
2. Some level of review of the GCN licence is required, if only to ensure that the conditions of that licence are still being met. For example, is protective fencing still required, if so, is the fencing being maintained and therefore still effective? What is the situation with GCN and ongoing monitoring? I recently helped to arrange access to the ponds for ecologists training other ecologists for the purposes of gaining GCN licences ... monitoring of the resident populations would be a part of this. Basically, more information is required here.

Questions:

1. Where are the owl access and nesting platforms?
2. Where have bat boxes been installed?
3. The text says reptile enhancements are being provided. More detail here is required.
4. Are any repeat surveys planned for the ultimate conclusion of works, as a comparison with the surveys undertaken at the start of the scheme?