

INTERNAL MEMORANDUM

To: Adam Foote
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 3

Date of previous memo: 29/04/2024

Date: 22/05/2024

SUBJECT: P/24/0034 | Construction of a new Primary School including access, landscaping, play / sports pitches, parking, external works, swale, plant and associated works | Land To The North Of Goitre Lane Gurnos Merthyr Tydfil

Ecology-related documents submitted in support of the above application:

1. Goetre Field School, Goitre Lane, Merthyr Tydfil. Updated Preliminary Ecological Assessment. Version V.20. Date 30th October 2023.
2. Goetre Field School, Goitre Lane, Merthyr Tydfil. Reptile Survey Report. Version V2.0. Date 30th October 2023.
3. Goetre Primary School, Merthyr. Tree Survey Data & Tree Constraints Plan, Arboricultural Impact Assessment, Tree Protection Plan and Arboricultural Method Statement. Project Reference – ArbTS_1751.1_Goetre Primary School. Date: 8th April 2024.
4. Goetre Primary School. Green Infrastructure Statement. Rev F by Soltys Brewster, Dated 22nd April 2024.
5. 2387201 - SBC - 00 - XX - DR - L - 300 - Landscape and GI Constraints and Opportunities Plan - PR02. Oct 2023.
 - a. 2387201 - SBC - 00 - XX - DR - L - 400 - Strategic Soft Landscape Plan - PR07.
6. 26CB01 – SBC – 00 – XX – DR – L – 0405 – Biodiversity Enhancement Plan. P01. May 2024.

7. 26CB01 – SBC – 00 – XX – DR – L – 0403 – South off-site habitat compensation sketch design. P04. Mar 2024.
8. 26CB01 – SBC – 00 – XX – DR – L – 0401 – External Areas Calculation. P03. Nov 2024.
9. 26CB01 – SBC – 00 – XX – DR – L – 0400 – Strategic Soft Landscape Plan. P03. Oct 2023.
10. 26CB01 – SBC – 00 – XX – DR – L – 0402 – West off-site habitat compensation sketch design. P04. Mar 2024.
11. Land off Goitre Lane, Gurnos, Merthyr Tydfil CF47 9SA. Biodiversity Strategy Version 2 by Ecological Services Ltd, Dated 14th May 2024.
12. Goetre Field School, Merthyr Tydfil. Bats & Trees Survey Report, Version V1.0 by Ecological Services Ltd, Dated 12th February 2024.
13. Land to the North of Goitre Lane, Goitre Lane, Gurnos, Merthyr Tydfil. Ecological Impact Assessment, Version V.2 by Ecological Services Ltd, Dated 13th May 2024.
14. Goitre Field – Merthyr (SO05020829). Invertebrate Survey Report. Christian Owen Bio-Surveys. October 2022.
15. Land off Goitre Lane, Gurnos, Merthyr Tydfil CF47 9SA. Ecology & Landscape Addendum, V1. Ecological Services Ltd, Dated 9th May 2024.
16. Goetre Primary School. Project Specific Method Statement (CEMP). **Date? Version number?** Morgan Sindall Construction.

Notes

- The Ecology & Landscape Addendum (Document 15 above) refers to:
 - a V2 of the Bats & Trees survey report – could this please be supplied?
 - a V3 of both the PEA and the Reptile survey report – could these please be supplied?
- The GIS (Document 4 above) has a new version (V4), but the date has not been revised – Please could this be amended?
- The Ecological Impact Assessment (Document 13 above) has a new date, but the version number has not been revised - Please could this be amended?
- The CEMP (Document 16 above) has no date or version number - Please could these be added?

COMMENTS

Responses from Ecological Services Ltd in [blue](#). Further responses from the LPA Ecologist below in **bold** black.

Is onsite compensation sufficient?

Points a-g outline the minimum requirements for the onsite compensation to be acceptable. More detail regarding each point is then found below

- a. Detail the species found only within the redline boundary, rather than the wider greenline boundary.
- 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
- c. Ensure currently present onsite species are also present post-development and ensure the species mix is also supplemented to improve overall biodiversity.
- d. Improve the off-site areas (western and southern) by ensuring the species present are protected, whilst being supplemented/enhanced by further species.
- e. Demonstrate Net Benefit for Biodiversity (NBB) with reference to DECCA
- f. Ensure appropriate and fully funded long-term management and protection of the onsite and the offsite habitats.
- g. All onsite species must be native species of local (if not Welsh or UK) provenance.

a. Detail the species found only within the redline boundary, rather than the wider greenline 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.

Accepted.

b. Detail the areas of each habitat type and the species found within each onsite 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.

Thank you. NB the table is not accurate in terms of numbers of species proposed – specifically there is double-counting of species.

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- c. *Ensure currently present onsite species are also present post development and ensure the species mix is also supplemented to improve overall biodiversity within the habitat types present.*

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.

It is agreed that the chosen seed mixes (*in the context of 'off-the-peg' products*) have been aimed at the habitats to be created. However, 'off-the-peg' mixes are not the only solution - there are a number of other possible options/methods:

- A. Combining seed mixes: combining commercial seed mixes from different sources.
- B. Bespoke seed mixes – Emorsgate offer bespoke mixes – not all current onsite species will be available, but there may be an opportunity to improve the species mix to better approximate the onsite habitat.
- C. Onsite seed collection/harvesting/drying/storage. NB Emorsgate offer the following services: Contract Brush Harvesting, Seed Drying & Cleaning, Seed Storage.
- D. Plug Planting – species that cannot be obtained in a seed mix could be added as plug plants or seed bought separately, for example
 - [Hard Rush \(Juncus Inflexus\) | Naturescape Wildflower Farm](#)
 - [Soft Rush \(Juncus effusus\) | UK Delivery | Naturescape](#)
 - [Marsh Foxtail \(Alopecurus geniculatus\) | Naturescape](#)
 - [Square Stemmed St. Johns Wort | Hypericum tetrapterum | Naturescape](#)
 - [Glaucous Sedge \(Carex Flacca\) | Naturescape](#)
 - [Brooklime | Veronica beccabunga | Naturescape Wildflower Farm](#)
 - [Lesser Spearwort \(Ranunculus flammula\) | Naturescape](#)
 - [Dactylorhiza fuchsii Common Spotted-Orchid \(growildnursery.co.uk\)](#)
 - Translocation of the current onsite habitat/soils for example:
 - Grassland turves could be removed, stored and re-used.
 - Soils could be stripped (in dry weather) with topsoil and subsoil handled and stored separately. Soils could then be reused, subsoil laid first with topsoil above. The harvested seed bank (as detailed above) could then be used within the restoration areas. Supplementary seeding and planting with commercial seed mixes and plug plants (again as detailed above) could then be employed to provide the best chance of success.

A combination of all methods will be used. There will also need to be reactive management of the habitats to ensure they develop appropriately into the future. An update to the CEMP-B may need updating with details, for example, regarding storage and protection of soils.

Amendments to any relevant landscaping documents, drawings and plans will be required.

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 EcIA 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.

This information is acceptable.

e. The Step-Wise Approach & Net Benefit for Biodiversity (NBB)

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.

The GIS has been updated sufficiently, based on the information regarding the proposed landscaping scheme as it stands. However, given the requirements of Points c and g, the information may need to undergo a further update following the requested changes.

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. Funding details and responsibilities for management of the habitats must be provided.

NB this was a general point for the planning case officer and the scheme project managers rather than for the ecology team.

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.

Currently, of the 118 species proposed (see the Strategic Soft Landscaping Plan - Document 9) 78 are native (c.66.1%), with the remaining 40 species made up on non-natives, cultivars/nativars (c.33.9%).

It will be acceptable for a 75% (native) / 25% (non-native/cultivar/nativar) split, *provided that evidence is provided that the species present within the 25% will present a benefit for and no harm to wildlife.*

Just by way of an example, see the table below for proposed non-native/cultivar/nativar species that could easily be substituted with a native counterpart/version.

#	Current species	Substitute
1	<i>Cornus sanguina</i> 'Midwinter Fire'	<i>Cornus sanguina</i>
2	<i>Briza maxima</i>	<i>Briza minima</i>
3	<i>Geranium oxonianum</i> 'Wargrave Pink'	<i>Geranium molle</i> or <i>Geranium pratense</i> or <i>Geranium lucidum</i>
4	<i>Lonicera nitida</i> 'May Green'	<i>Lonicera periclymenum</i>
5	<i>Persicaria bistorta</i> 'Superba'	<i>Persicaria bistorta</i>
6	<i>Sesleria autumnalis</i>	<i>Molinia caerulea</i> or <i>Sesleria caerulea</i>
7	<i>Vinca minor alba</i>	<i>Vinca minor</i>
8	<i>Ajuga reptans</i> 'Catlin's Giant'	<i>Ajuga reptans</i>
9	<i>Carpinus betulus</i> 'Frans Fontaine'	<i>Carpinus betulus</i>
10	<i>Acer campestre</i> 'Streetwise'	<i>Acer campestre</i>

These changes alone would swing the percentages just about to the acceptable level - 88 native species (c.74.6%), with the remaining 30 species made up on non-natives (c.25.4%).

If these changes were made, evidence would then be required to show that the 30 species remaining within the c.25.4% will present a benefit for, and no harm to, wildlife. If evidence cannot be provided then further changes to the species would be required.

The 75:25 split is a minimum requirement, but obviously a greater ratio of native to non-native would be preferable and easily achievable for the scheme.

Amendments to any relevant landscaping documents, drawings and plans will be required.

Wholly exceptional circumstances?

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.

NB this was a question posed for the planning case officer rather than the ecology team.

Missing reports

- The following surveys are referred to within Document 1:
 - an invertebrate survey 2022 (4th August 2022); and
 - a marsh fritillary survey (30th August 2022)

These survey reports must be provided for review.

These reports have been supplied.

COMMENTS:

Limitations of the Invertebrate survey included:

- Sampling was only conducted on a single visit
- Reduced rainfall during the months preceding the survey

Notwithstanding the above limitations, the report considers Goitre Field to be an important refuge for uncommon invertebrates declining in the wider countryside and/or habitat specialists with restricted distributions in Britain. The report ends by recommending a more comprehensive survey enable a more informed assessment of the invertebrate conservation value of Goitre Field.

Question – was there a reason the recommended further survey work was not undertaken?

The limitations and of the survey work and recommendation of the report lend more importance/greater weight to the requirement detailed in Points c and g (above). The re-creation of habitats should take into account the information within the invertebrate report regarding notable onsite species and their habitat requirements including relevant and important plant species (including larval food plants and associations – see yellow highlights in the table below for examples). The mosaic of habitat types onsite (including Blackthorn and Bramble scrub, marshy grassland, semi-improved neutral grassland and mature trees) is also important for completing the lifecycles of invertebrates.

Species of Principal Importance in Wales under Section 7 of the Environment (Wales) Act 2016	<i>Ceramica pisi</i> (Lepidoptera: Noctuidae), Broom Moth	Larval foodplants: Bilberry, birches, Bracken, Broom docks and Common Toadflax
	<i>Tyria jacobaeae</i> (Lepidoptera: Erebidae), Cinnabar Moth	Larval foodplant: Common Ragwort
Nationally Scarce species	<i>Leptoiulus belgicus</i> (Julida: Julidae), a millipede	Can often be encountered under logs and from sieving leaf litter
	<i>Saldula orthochila</i> (Hemiptera: Saldidae), a shorebug	Associated with dry habitats, such as grasslands, sand dunes and wastelands
	<i>Tetanocera punctifrons</i> (Diptera: Sciomyzidae), a snail-killing fly	Found in a wide variety of habitats include true wetlands as well as other damp habitats, such as small flushes and farm ditches
Nationally Local species	<i>Adelphocoris quadripunctatus</i> (Hemiptera: Miridae) a plant bug	Associated with both Common Bird's-foot-trefoil and Greater Bird's-foot-trefoil
	<i>Alebra wahlbergi</i> (Hemiptera: Cicadellidae), a leafhopper	Associated with a range of trees, especially, Elm, Horse Chestnut, maples, Sycamore

	<i>Anoscopus flavostriatus</i> (Hemiptera: Cicadellidae), a leafhopper	Associated with various species of grass across Britain, usually in damp areas
	<i>Aphrodes bicincta</i> (Hemiptera: Cicadellidae), a leafhopper,	Associated with grasses in well vegetated sites
	<i>Berytinus minor</i> (Hemiptera: Berytidae), a stiltbug	Associated with clover spp, Common Restharrow and Lesser Yellow Trefoil
	<i>Cyrtorhinus caricis</i> (Hemiptera: Miridae) a plant bug	Found in damp habitats with rushes and sedges
	<i>Floronia bucculenta</i> (Araneae: Linyphiidae), a money spider	Occurs in a variety of damp habitats, i.e., rough unmanaged grassland with scrub and tall herbaceous vegetation, low vegetation in marshy areas, open woodland, and grass and tall heather
	<i>Graptus triguttatus</i> (Coleoptera: Curculionidae), a weevil	Associated with the roots of various plants, often on Ribwort Plantain
	<i>Hydrothassa glabra</i> (Coleoptera: Chrysomelidae), a leaf beetle	Associated with Ranunculaceae, especially Creeping Buttercup and Meadow Buttercup
	<i>Kelisia pallidula</i> (Hemiptera: Delphacidae), a planthopper	Associated with sedges
	<i>Macrosteles laevis</i> (Hemiptera: Cicadellidae), a leafhopper	Associated with a range of grasses, sedges and rushes
	<i>Miridius quadrivirgatus</i> (Hemiptera: Miridae) a plant bug	Associated with various grasses in dry grasslands
	<i>Philonthus albipes</i> (Coleoptera: Staphylinidae), a rove beetle	Associated with dung and litter piles in various habitats
	<i>Phyllotreta tetrastigma</i> (Coleopter: Chrysomelidae), a flea beetle	Found in various habitats, mainly (but not only) in wet habitats such as wet meadows and wet woodland
	<i>Sphenella marginata</i> (Diptera: Tephritidae), a fruit fly	Associated with ragworts and groundsels in various well vegetated habitats

	<i>Streptanus aemulans</i> (Hemiptera: Cicadellidae), a leafhopper,	Associated with various grasses usually in damp habitats
	<i>Tytthus pygmaeus</i> (Hemiptera: Miridae) a plant bug	Associated with damp marshy habitats
	<i>Xylocoris galactinus</i> (Hemiptera: Anthocoridae), Hot-bed Bug	Mostly associated with manure heaps and other places where the temperature is high, but can be found in other habitats when dispersing

In addition, the Invertebrate report identifies several plant species as specifically being present on the development site – ‘... a large flat open semi-improved neutral grassland that contains both wet and dry habitats, that is dominated with rushes (*Juncus*) (Figure 1). Other species present here includes (but is not limited to): *buttercups*, *clovers*, *docks (Rumex)*, *Lesser Celandine (Ficaria verna)*, *ragwort*, *Ribwort Plantain*, *thistles (Cirsium)* and *Watercress (Nasturtium officinale agg)’*.

There are native species referred to here that will also need to be included post-development (e.g, lesser celandine, ragwort etc).

Enhancements

All enhancement measures (bat boxes, bird boxes, hedgehog (and reptile) friendly fencing, reptile hibernaculum, butterfly bank etc etc) will be clearly marked on all relevant architect plans, drawings, and/or elevations. Details of how these features will be maintained will also be included. Preferentially, the plans/drawings/elevations would be submitted prior to determination. However, if necessary, they can instead be secured via an appropriately-worded pre-commencement planning condition. Written approval from the LPA ecologist will be required to discharge the condition.

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.

NB Bat and bird boxes will also need to be shown on elevation drawings for the new building. The boundary treatment plan showing the access features for hedgehogs/reptiles/amphibians is also still required. Preferentially, these will be supplied prior to determination. However, if necessary, they can instead be secured via an appropriately-worded pre-commencement planning condition. Written approval from the LPA ecologist will be required to discharge the condition.

Lighting

During construction: No night time working that required the use of artificial light at night (ALAN) will be permitted.

During operation/Post-development: the use of artificial lighting will be limited to when and where absolutely necessary. Any proposed onsite artificial lighting (both external and internal) must conform to the following guidelines:

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

A full lighting plan will be required for consideration by the LPA ecologist (including for example horizontal and vertical illuminance plans) to demonstrate areas proposed to be lit and areas that will remain dark in order to provide dark routes through and around the site. Dark routes to allow bats to access bat boxes/features within the new buildings will also need to be demonstrated.

The lighting plan must also include Compound and Works/Construction Lighting (see page 20 of the CEMP-B).

There will need to be restrictions regarding timings – so, when artificial lighting can be in operation (times of year, times of day).

The lighting engineer would need to survey the site to produce onsite ambient light levels for use as a baseline (NB taking into consideration nearby illuminated works that will not be present once A465 works completed).

Preferentially, the lighting plan would be submitted prior to determination. However, if necessary, it can instead be secured via an appropriately-worded pre-commencement planning condition. Written approval from the LPA ecologist will be required to discharge the condition.

LHES

No development shall take place (including ground works, vegetation clearance) until a detailed long term Landscaping, Habitat & Ecology Scheme (LHES) has been submitted to and approved in writing by the local planning authority. The LHES must include, but not be limited to, the following:

- Details of retained landscaping/habitat/green infrastructure
- Details of new landscaping/habitat/green infrastructure
- Details of protected off-site mitigation and enhancement areas (western and southern)
- A planting plan using at least 75% native species of local (if not Welsh or UK) provenance.
- Long term maintenance and management measures for all onsite landscaping/habitat/green infrastructure (both retained and new, on- and off-site)

- Details of other ecological measures, e.g., bat boxes, bird boxes, hibernacula, gaps in boundaries for hedgehogs etc
- Monitoring post-development for all onsite landscaping/habitat/green infrastructure and other ecological measures
- Details of the funding mechanisms to meet the maintenance, management and monitoring objectives.
- Details of the responsible organisations and/or people.

Preferentially, the Landscaping, Habitat & Ecology Scheme (LHES) would be submitted prior to determination. However, if necessary, it can instead be secured via an appropriately-worded pre-commencement planning condition. Written approval from the LPA ecologist will be required to discharge the condition.

CEMP-B

A Construction Environmental Management Plan - Biodiversity (CEMP-B) will be required to include protection measures for any retained habitat and/or species likely to be present during construction.

Preferentially, the CEMP would be submitted prior to determination. However, if necessary, it can instead be secured via an appropriately-worded pre-commencement planning condition. Written approval from the LPA ecologist will be required to discharge the condition.

This document has now been submitted.

COMMENTS

The document must include procedures regarding open trenches and holes and either covering them at night or providing a means of escape for animals that may fall in and become trapped. Something along the following lines: *‘All uncovered excavations or trenching will include a means of escape for animals that may fall into them. This may be a plank set at 30° to allow escape.’*

INNS

There will need to be an Invasive Non-Native Species working method statement (INNS-WMS) produced by specialist INNS contractors. The recommendations of the report will be followed. Preferentially, the INNS-WMS would be submitted prior to determination. However, if necessary, this can instead be secured via an appropriately-worded pre-commencement planning condition. Written approval from the LPA ecologist will be required to discharge the condition.

The single page statement at the end of the CEMP-B document does not constitute an Invasive Non-Native Species working method statement (INNS-WMS) produced by specialist INNS contractor. The above statement therefore stands.

Precautionary Working Method Statement (PWMS)

A Precautionary Working Method Statement (PWMS) will be required covering all protected species that may be impacted by the proposed development, for example, reptiles, amphibians, nesting birds etc. Preferably this would be provided prior to determination. If not, it could be secured via an appropriately-worded pre-commencement planning condition. Written approval will be required from the LPA ecologist for discharge.

Compensatory tree ratio

Given the amount of proposed trees/woodland/hedgerow post-development, this target will obviously be met, but this will need to be stated somewhere within the submitted documentation, e.g., The Green Infrastructure Statement (GIS).

This has been added and is acceptable.

Consistency

NB there needs to be consistency between the documents submitted that relate to ecology and biodiversity (e.g., EcIA, GIS, LHMS and any plans/drawings etc).

All information is now consistent - *with the exception of the Bats & Trees Survey Report* – the new version V2 has been requested (see the Note at the beginning of these comments). This is required to ensure consistency across these documents.

Table 1

Biodiversity Strategy (Doc 11)	Bats & Trees Survey Report (Doc 12)	Green Infrastructure Statement (Doc 4)	Arboricultural Report (Doc 3)
T1 (Hawthorn)	T1 (Hawthorn)	Removed Trees – 5 no.	T1 (Hawthorn)
T2 (Hawthorn)	T2 (Hawthorn)		T2 (Hawthorn)
	T3 (Hawthorn)		
	T4 (Ash)		
T5 (Ash)			T5 (Ash)
G1 (Lime)	G1 (Common Lime)		G1 (Lime)

	G2 (English Elm)		
	G3 (Common Lime)		
	G4 (Goat Willow)		
	G5 (Goat Willow)		
[a small section] of G6 (Hawthorn, scrub)	G6 (Hawthorn mixed scrub)		Part of G6

All documents and plans/drawings relating to ecology and landscaping must contain consistent information, including, but not limited to, information regarding numbers of species, species names, species mixes, areas of habitat etc etc.