



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Date Dyddiad	31st March 2020
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Your ref Eich cyf	
Our ref Ein cyf	P2020/0210

Rhondda Cynon Taf Planning - Mr James
Emery
Planning Department
Rhondda Cynon Taf

Dear Rhondda Cynon Taf Planning - Mr James Emery

TOWN AND COUNTRY PLANNING ACT 1990
THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES)
ORDER 2012
CONSULTATION WITH NEIGHBOURING LOCAL PLANNING AUTHORITY
IN ACCORDANCE WITH ARTICLE 14(1)

PROPOSAL: Consultation from Neighbouring Authority Rhondda Cynon Taff County
Borough Council for a bike trail

LOCATION LAND WITHIN THE PEN-Y-CYMOEDD FOREST.
GLYNCORRWG
PORT TALBOT
SA13 3AY

APPLICANTS NAME & ADDRESS Rhondda Cynon Taf Planning - Mr James Emery

YOUR REF:

I refer to the above planning application referred to this Council in accordance with the above act and order and would offer the following objections:

1 The information submitted to support the application is not considered adequate considering the sensitivity of the location. No assessment has been provided in relation to impacts upon the delivery of the Pen y Cymoedd Wind Farm Habitat Management Plan, approved under the planning permission for the wind farm and as per the requirements of the S106. The creation of a new route could damage the peatland resources in places, impact hydrological functioning that could also affect the ability to restore the peatland and impact protect species. In addition, there is

Amgylchedd ac Adfywio

Ceri Morris Pennaeth Cynllunio a Gwarchod y Cyhoedd

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Environment and Regeneration

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Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni.

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

potential for habitat restoration to damage the route if the route was constructed prior to restoration. Further and full assessment is therefore considered necessary.

It should be noted that the proposal for ground nesting bird mitigation is not appropriate for Nightjar see Shewring & Vafidis 2017(<https://uwe-repository.worktribe.com/output/903317/the-effectiveness-of-deterrent-measures-to-minimize-disturbance-impacts-to-breeding-european-nightjar-at-an-upland-wind-farm-site-in-south-wales-uk>). Further consideration of such mitigation is therefore recommended.

Water vole are known to be present in this area. A survey is recommended to be undertaken and any necessary mitigation detailed.

Details of reptile mitigation is recommended to be provided. Pen y Cymoedd Wind Farm construction demonstrated presence across the plateau. The works proposed are recommended to be consistent with Pen y Cymoedd HMP reptile mitigation strategy.

The below sets out some specific comments:

Section A - appears to be ok from a peat restoration perspective, although other ecological impacts will need to be considered.

Section B - Broadly seems to avoid the majority of deep peat areas, although other ecological issues will need further consideration. Deep peat is present in the west of then central stretch (290989 202105). Appropriate access design and avoidance of deep peat here would be needed.

Section C - track bisects a large deep peat body. Given the lack of hydrological mitigation information provided we would be concerned that this will have a serious detrimental impact on restoration in this area. An alternative route is recommended for this section in particular.

The current submission does not include any assessment on hydrology, and therefore there appears to be a lack of evidence or risk based mitigation for impacts of the track on hydrological flow pathways. The installation of the cross contour track (especially section c) has the potential to intercept and change flow pathways from diffuse to point discharges and detrimentally impact flow into down slope peat bodies. It would be good to see this addressed for Section c in particular as there are known valley mire features to the east that could be impacted.

Prior to determination of the application the following information is required to be submitted to inform the decision:

- o An Ecological Impact Assessment (EclA) is recommended to be undertaken in line with standard industry guidelines. This shall include:
- o An Extended Phase 1 habitat survey, this should include the identification of the presence of S7 Environment (Wales) Act (S42 NERC Act 2006)/ LBAP habitats and species, sites that meet SINC criteria, in addition to protected species. A balance of S7/LBAP/SINC habitat loss/gain to the scheme should be included. The surveys should cover all areas that may be impacted by the scheme including the access route. The results of this survey should inform the requirement for further more specific surveys, such as bird surveys, reptile surveys.

- o Peat depth and hydrology surveys/investigation
- o Water Vole, Reptiles and Upland bird surveys/assessments
- o A biodiversity record search from the South East Wales Biodiversity Records Centre (SEWBReC) should be undertaken to inform the required surveys and the assessment.
- o An assessment of ecosystem resilience (Section 2 Environment (Wales) Act 2016); this shall particularly consider:
 - o diversity between and within ecosystems;
 - o the connections between and within ecosystems;
 - o the scale of ecosystems;
 - o the condition of ecosystems (including their structure and functioning);
 - o the adaptability of ecosystems.
- o An assessment of impacts upon bird habitat (Section 9a Conservation of Habitats and Species Regulations 2010 as amended); this should ideally be based on up to date survey information (including breeding, foraging and wintering requirements).
- o Proposals for mitigation/compensation for any adverse impacts identified in the above assessments.
- o Details of biodiversity enhancement measures.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Ceri Morris', written over a horizontal line.

Ceri Morris – Head of Planning & Public Protection