

INTERNAL MEMORANDUM

21/12/2021

Planning Application Ref: P2021/1230

Bwlch Ffos Quarry BIODIVERSITY COMMENTS

In reference to the above application an Officer of the Countryside and Wildlife Team has reviewed the application submitted with the following comments and recommendations.

The Countryside and Wildlife Team, in responding to the above application, provides the following substantive response:

No comment	☐
No objection (subject to any specified conditions below)	☒
Concerns have been identified (see below for how those concerns can be addressed by the applicant)	☐
Objection – on the grounds set out below	☐

Comments and recommendations:

We welcome the proposal to include an Ecological Statement with the full application. Please note that our understanding of the importance of previously worked sites for biodiversity has greatly increased in recent years and, in addition to the standard requirements below we recommend an assessment is made of the invertebrate fauna on site.

Please also note that due to a number of false positive results we do not accept eDNA surveys for Great Crested Newts, if there is a large number of waterbodies we would accept a blend of physical surveying and eDNA. In addition, Water Vole surveys will be required as they have been found in terrestrial habitats in similar locations recently.

Surveys and other requirements needed prior to determination:

We have no comment on the requirement for an EIA. Prior to determination of a full application the following information will be required to be submitted to inform the decision:

- An Extended Phase 1 habitat survey, this should include the identification of the presence of S7 Environment (Wales) habitats and species, sites that meet SINC criteria, in addition to protected species. A balance of S7/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

Biodiversity Consultation Response

route. The results of this survey should inform the requirement for further more specific surveys, such as bird surveys, reptile surveys.

- A biodiversity record search from the South East Wales Biodiversity Records Centre (SEWBReC) should be undertaken to inform the required surveys and the assessment.
- An assessment of ecosystem resilience (Section 2 Environment (Wales) Act 2016); this shall particularly consider:
 - (a) diversity between and within ecosystems;*
 - (b) the connections between and within ecosystems;*
 - (c) the scale of ecosystems;*
 - (d) the condition of ecosystems (including their structure and functioning);*
 - (e) the adaptability of ecosystems.*
- An assessment of impacts upon bird habitat (Conservation of Habitats and Species Regulations 2017 as amended); this should ideally be based on up to date survey information (including breeding, foraging and wintering requirements).
- Proposals for mitigation/compensation for any adverse impacts identified in the above assessments.

The Authority must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions, under the Environment (Wales) Act 2016. It is therefore essential that the above recommendations for the conservation of biodiversity be followed to ensure that the Planning Authority complies with this statutory requirement along with the adopted guidance in the Biodiversity supplementary planning guidance and TAN 5 (2009).

If you require further clarification of any of the above points please contact Rebecca Sharp.

A handwritten signature in blue ink, appearing to read 'Laura Palmer'.

Laura Palmer MCIEEM
Senior Ecologist