

INTERNAL MEMORANDUM

Date: 11/04/2024

Planning Application Ref: P2023/0970

**Crymlyn Tip
BIODIVERSITY COMMENTS**

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:**Surveys and other requirements needed prior to determination:**

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

Surveys

All species surveys, apart from great crested newts, are out of date and therefore not in line with best practice.

Habitat Regulations Assessment

The Environmental Assessment states that a separate 'information for Habitat Regulations Assessment (iHRA)' will be prepared. We need this up front in order to complete the assessment.

Secondary woodland

The Environmental Assessment states that it is anticipated that the majority of secondary woodland will be fully retained. If any of this woodland is to be removed we need to assess these impacts now.

Great crested newts

The proposal to translocate great crested newts into the Coed Darcy GCN SINC is not appropriate. NRW have already confirmed that the site is at carrying capacity and will not grant a licence based on this. Details of an alternative receptor site are required in order for a derogation licence to be obtained.

Reptiles

Biodiversity Consultation Response

Further details on a receptor site for translocated reptiles are required as simply moving them to other parts of the site, without assessing and increasing carrying capacity first, is not appropriate.

Biodiversity Net Benefit

Full details of loss/gain of habitats is required. We can not accept the inclusion of the proto ponds as enhancement as they already exist and any enhancement to them would require a licence as they contain great crested newts.

Landscaping plan

This does not contain enough information. We need to know what species mixes are going in and how it will be maintained.

Planning Policy Wales

All documents should be updated to address the changes to Planning Policy Wales which came into effect October 2023.

Conditions:

If the application is to be granted it is recommended that the following be conditioned into the permission:

- None

Informatives:

If the application is to be granted it is recommended that the following informative notes be included in the permission:

- None

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 Laura Palmer.

Biodiversity Consultation Response

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

Laura Palmer MCIEEM

Senior Ecologist