

Section		Comment from NPTC Biodiversity	Applicant Response
Green Infrastructure Statement (Fairhurst)			
2.3	As recognised within the Planning Statement, submitted in support of the proposed development, the site is not contained within, nor is it located in the immediate proximity of any statutory ecological designations. Furthermore, the site is not contained within or located in the immediate proximity of any non-statutory ecological sites.	As referenced in the EIA, the site is 0.20km away from a Gors Llwyn, Onllwyn SSSI. There are 3 national statutory sites within 2km. There are 12 non-statutory sites within 2km of the site and two of the habitat descriptions state that certain habitats overlap with two different SINC's indicating the site is adjacent to SINC's. This would be considered to be immediate proximity of ecological designations/sites.	The reference to 0.20km is the distance from the overall GCRE site to Gors Llwyn Onllwyn SSSI. The distance from the site subject to this application to the Gors Llwyn SSSI is approximately 900m to the northeast of the Site. Therefore due to this distance, the SSSI is not considered to be in the immediate proximity of the proposed development site. Gors Llwyn Meadows Sinc, at its closest point, lies approximately 210m to the northeast of the site. Equally, it is considered that the proposed development does not lie in the immediate proximity of any non-statutory ecological designations due to the localised impact of the development subject to this planning application and the distance involved.

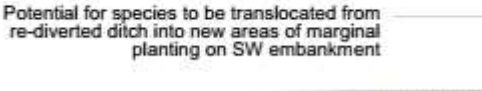
2.7. Avoid	The proposed development is not located within or contained in the immediate proximity of any statutory or non-statutory ecological designations. Furthermore, as recognised by the submitted ecological and arboricultural documents, the proposed development does not contain irreplaceable habitats.	As above.	As above.
2.7 Mitigate/restore	The proposed development will necessitate the loss of Tree Groups G1-G3 and T1, which are recognised as Category C trees. The extent and location of these trees are depicted within viewing the Tree Constraints Plan contained within the submitted Arboricultural Report. The submitted EclA also recognises that the proposals will entail the removal of semi-improved grassland and potential nesting sites for Sand Martins. However, the submitted Proposed Soft Landscape Plan seeks to deliver 29no. new trees, the creation of rain garden SuDS features; and wet meadow flora, coal seam and open mosaic habitats. In light of these measures, the EclA details finds that the proposals will, <i>"adequately mitigate, compensate, and enhance the protected, priority and notable habitats and species within and adjacent to the site"</i> .	Are the Sand Martin nesting sites being mitigated for? Do the 29 new trees compensate for the amount of trees being removed. I cannot find numbers of trees being removed in the Arb report. PPW12 states that there should be a 3 trees of a similar type and compensatory size planted for every 1 lost. If the group of trees being removed is classified as woodland it should be replaced with a planting rate of 1600 trees per ha for broadleaves and 2500 per hectare for conifers.	See response to 4.29 on Sand Martin. As can be seen in the aerial image on Figure 2 of the Ecological Impact Assessment Summary it is difficult to provide a quantitative / ratio based justification for compensatory planting due to the size of existing trees on site which appear self-seeded. Most of the existing trees have been identified as low value / CAT-C, dominated by areas of overgrown scrub. Existing species diversity is low and the understory is limited. Meanwhile the proposed trees / compensatory tree planting proposals aim to improve quality and diversify the existing canopy cover with a range of native species, increasing biodiversity value. Where trees are removed they will be replaced with grassland

			embankments, new woodland understory planting and SUDS features with ecological / visual value. The tree proposals also play an important role in the approach to placemaking. Trees are proposed to the NE, SW and NW embankments to extend the canopy cover to other areas providing visual benefits, articulate views, provide embankment stabilisation and additional shelter for wildlife. There is also value in clearing some of the existing scrub (identified as CAT-C trees) to provide a more open wooded structure and allow light to get to the undergrowth to improve the understory habitat. It is considered that this is a more appropriate approach to consider the impact on trees as a result of the proposed development rather than only considering a quantitative approach.
Ecological Impact Assessment (Wildwood Ecology)			

Summary	- Multiple ecological surveys have been undertaken across the whole site including: - Bat surveys by BSG Ecology in 2022/23 - Phase 1A Floral check by Sturgess Ecology in 2022 - Riparian Mammal and Badger survey by BSG Ecology in 2022 - Reptile species report and trapping and relocation method statement by Atkins in 2023. - Preliminary Ecological Appraisal Phase 1A and 2 undertaken by Dalcour Maclaren in 2022. - Bat survey report Phase 1A and 2A by BSG Ecology in 2022/23 - Bat survey report Phase 2A by BSG in 2022	Not all of these reports have been submitted with this application. Can these reports be submitted as we are not sure if we have the most up to date versions that have been submitted with other applications that have since been withdrawn.	I have attached these documents to this email.
Key Constraints	- The proposed development would result in impacts on the following designated sites, habitats and protected species: - Gors Llwyn, Onllwyn (SSSI) see Dalcour Maclaren Preliminary Ecological Appraisal Phase 1A and 2 2022 section 7, for details on constraints, opportunities and recommendations for designated sites. - Broadleaved woodland Category C - Semi-improved acid grassland - Running water - Nesting birds - Reptiles - Otters during the close-inspection work.	The GIS needs to be updated to take into account the impact on the SSSI and these constraints need to be covered in this application for clarity.	Please see the response to 2.3.
4.16	4.16 Whilst no bat roosts were confirmed within the structures surveyed during 2023, it is possible that bats will move roost locations regularly and exploit other roost opportunities within the Site. Therefore, structures within the Site assessed as having Moderate (or higher) suitability to support roosting bats (the Southern Bridge) are likely to contribute to the roosting resource within the Site. As a precautionary measure, the demolition of the northern bridge should also be carried out under the licenced method statement required for the buildings containing confirmed roosts.	If the Northern bridge contains no bat roosts why is it being carried out under a licensed method statement? In the BSG bat report it states that the N bridge has low	Bats are a mobile species and whilst there were no bat roosts observed at the time of the reports being written, there is every potential that bats are now roosting in the bridge. The recommendation is taken from the BSG report and states that the Licenced Method statement is for Buildings with confirmed roosts,

		potential so should just be subject to a pre-demolition check.	the method is proposed as a precaution to prevent breaching legislation and disturbing/ destroying a roost that may or may not be present.
4.19	Riparian mammals and European Badger	Updated surveys should be conducted prior to construction to ensure that no changes have occurred. Please	The surveys undertaken have now been provided to the Local Authority in the email dated 28 March 2024.
4.29	4.29 Any new wall structures should contain gaps to create new nesting areas for sand martins.	This should be included in the Green Infrastructure statement and Soft Landscaping Proposals plan as currently it is not shown. Also not included in S4.38- Net benefits for Biodiversity.	These features were not incorporated within the design of the bridge structure, as detailed proposals have not been submitted for formal consideration. GCRE Ltd would be happy to accept a suitably worded, compliance condition requiring these features be incorporated within the bridge structure.
4.30	Reptiles	Please note that the Atkins Reptile species report and trapping and relocation method statement (2023) has not been approved so further clarity on how you	The Reptile Report has now been submitted as part of this planning application and although it covers a larger area than the site subject to this planning application, comment is sought on the appropriateness of the Survey and the method contained in 4.30 - 4.34 of the submitted Ecological Impact Assessment Summary.

		would like to proceed would be appreciated.	
	No lighting plan for the protection of dark corridors has been discussed		No lighting is being incorporated as part of the proposed development.
Other			
	There is no EPP included with this application		The EPP for the wider site has now been submitted with this planning application.
	All Ecological Surveys	We recommend that all the ecological surveys are checked to ensure they are still in date (e.g. water vole surveys from 2022). Please refer to the CIEEM Advice Note On the Lifespan of Ecological Reports and Surveys (April 2019) as to how long the surveys are valid.	Relevant surveys are considered to remain in date as of March 2024. Surveys referred to are now submitted with this application.
Proposed Soft Landscape Plan			
	Open Coal Mosaic is shown in the Key, however it is referred to as Coal Seam Habitat on the plan, should be kept consistent.		Revised soft landscape plan submitted.
	Area Safeguarded for potential future access track	What safeguarding measures are being undertaken, does	This has been written to convey that we're not touching this area as

		this mean that this woodland will potentially be lost in future?	part of the proposed development subject to this planning application.
	Hedera colchica	Why is Persian ivy being used? Our native Ivy has the same beneficial biodiversity impacts so a non-native species should not be included due to the potential for it to become Invasive	Revised soft landscape plan submitted.
	 Potential for species to be translocated from re-diverted ditch into new areas of marginal planting on SW embankment	What species will be translocated from re-diverted ditch, there is no further information on this in the reports	This is a more detailed element to be developed at the next design stage and will be subject to further site investigation at the time of construction works, hence we have identified as a 'Potential'. A note has been added to the revised drawing to confirm that this is subject to site investigation.
	Green Slope System	Why does this habitat consist of only 2 grass species – could it not be made more biodiverse and beneficial with appropriate	At this stage we have stated the baseline condition as per the typical slope system suppliers detail. However, we shall look to develop a more biodiverse mix when we develop the detailed planting information at the next design stage.

		wildflower species included.	
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