

Lankshear, Robert

From: Emma Harding <emma@asbriplanning.co.uk>
Sent: 17 December 2020 10:38
To: Lankshear, Robert
Cc: Barrie Davies
Subject: FW: 2020/01170/OUT - Further consultation response received

Importance: High

Hi Rob

I hope all is well.

The comments from the county ecologist are noted and our responses are provided below. As discussed previously the information has been provided within the submission.

The applicant is asked to provide additional information as follows:

- i. A table of impact on species and habitats, the scale and extent of mitigations proposed on site and off site and how they relate to any phased development of the application site

A table of impacts and summary mitigation for all 'important' ecology receptors ES Ecology Chapter is provided at Table 8.1 whilst further details is provided within the main body of the chapter. In relation to comments pertaining to phasing of development, this is not yet known. It is typical for this information to be provided as a condition of planning consent. EDP note that there are other comments in relation to the absence of mitigatory measures from the report. Proposed mitigation measures are provided from paragraphs 8.5.69 of the Ecology ES onwards. EDP also prepared a briefing note in response to PAC comments from NRW which summarises mitigation for dormouse and bats specifically.

- ii. That hedgerows and woodlands are separated in terms of both loss and mitigation and that the concept plan and the table in i) above reflect this

Loss of habitats needs to reflect the nature of those habitats. It is not helpful to lump together woodland and hedgerows and treat them using an area scale. Hedgerows should be separated out and dealt with as linear habitats measured by length. Woodlands should continue to be measured by area. If this is carried through to the mitigation strategy then a comparison can be made against length lost and length to be created.

EDP have reviewed the comments and disagree that hedgerow habitats should be measured entirely as linear metres as this conflicts with NRW's requirements in respect of dormouse licensing. NRW do require that measurements of habitat loss for woodlands, scrub and hedgrows be communicated as m² rather than meterage length. Presentation of hedgrows loss/creation in metre length furthermore has potential to undervalue the extent of impacts and/or mitigation. For example, a 50m hedgrows that's only 1m in width is comparatively poor for wildlife compared to a 40m hedgrows, 3m in width.

- iii. A plan that overlays the proposed development over an aerial photograph is prepared to show the extent of retention of existing features

EDP have reviewed and believe that such a plan will not be representative of the scale or habitat loss/creation and may create a margin of error. The concept plan and extent (area) of habitat loss and retention is currently based on a Tree Survey and topographic survey. As such the details are included within the submission,

- iv. That the connectivity described in g, h and i above is reflected in the concept plan

Similarly the Coastal Path forms an important north south corridor which is truncated by previous development to the north. The concept plan shows development close to the Coastal Path at certain points which gives rise to concern because of cliff erosion, the ability to have the path as a green corridor for both people and wildlife and the ability to relocate the path further inland if needed in the future.

The coastal path is being reviewed in relation to other comments.

In addition there is an opportunity to strengthen the corridor between the coastal path and the former railway line at the northern boundary with properties on Cosmeston Drive, Petrel Close and Whitcliffe Drive. This is currently quite 'thin' in places in the concept plan.

The coastal path is being reviewed in relation to other comments.

Finally on the theme of corridors and landscape, because this development will become the boundary for Penarth to the south then the opportunity should be taken to make the boundary planting much stronger to provide visual amenity and also to link the woodland in the south eastern corner to the former railway line.

New hedgerow planting is proposed along the southern boundary and illustrated on the GI plan in addition to areas of open space which offset built development further from the southern boundary.

- v. That dark corridors are identified within the concept plan

A detailed design is more appropriately delivered as a condition of planning consent. As this is an outline application a condition is requested.

- vi. Consideration be given to creating a larger reedbed and open water where the infiltration basins are currently indicated in the concept plan.

In the concept plan (Parameter Plan – green Infrastructure) there are a number of linear reedbeds. Other than as a physical and landscape barrier these will have relatively little value for wildlife. A large reedbed would be used by nesting birds and invertebrates especially if associated with open water and could be located at the infiltration basins?

The linear reedbeds represent the swales that deliver the sustainable drainage strategy. As such features are required to deliver SUDs, reedbed planting is proposed to naturalise these features and provide a further biodiversity enhancement and well as deliver benefits to visual amenity, softening the edges of development and thus contributing the concept of green infrastructure as multi-functional green spaces. Creation of a wetland habitat is furthermore proposed in association with the infiltration basins as per the GI plan. The detailed planting design will however need to consider multiple needs i.e. recreational space, biodiversity and drainage function. The provision of open water often conflicts with health and safety requirements.

- vii. That the future maintenance of the features created in the medium to long term is discussed and the responsibility, finance and specification is agreed through discussion.

This is more appropriately delivered as a condition of planning through preparation of a LEMP/EMP as recommended within the ES Ecology Chapter and consistent with NRW's recommendations in their response.

- viii. That the concept plan considers the connectivity east – west within the site and beyond in accessing the greenspace of Cosmeston Lakes Country Park.

This is provided. Specifically open space in the south east supporting the infiltration basins provided PROW which connect to the disused railway and the attenuation pond on the western boundary of the site.

Finally in terms of connectivity for biodiversity, education and people would a green feature bridge to Cosmeston Lakes Country Park be of more value to the occupants, visitors, the Primary School and wildlife of this development than an onsite feature bridge?

This would be outside our boundary and presumably present constraints in terms of highways and legalities

In addition to the above, I have extracted the additional pertinent points:

The surveys conducted before this application indicated a breeding pair of Skylark. Skylark are currently a red-listed species in the UK due to a continued population decline since 1969 primarily as a result of the loss of breeding habitat and changes in farming practice. Because of the nature of the development it will not be possible to mitigate on site and the applicant should identify off site opportunities that enhance the number of species.

Surveys undertaken noted a **single** breeding pair of skylark. Suitable habitat onsite is largely limited to the three arable fields, whilst improved grassland which dominates the site is considered less suitable particularly since it is disturbed by grazing livestock. There is furthermore much suitable habitat for this species within the wider landscape. As such I would not consider the proposed loss of habitat to development to have a significant negative effect on the conservation status of this species and would consider the provision of offsite mitigation for a single breeding pair unproportionally to the impacts. Although not a like for like in terms of skylark habitat the development will deliver a net gain and woody vegetation (shrub/woodland/hedgerow planting) or value to a breeding bird assemblage more generally. This is in addition to species-rich meadows, fruiting trees, and reeds.

Overall, several comments include a request for more information in relation to impacts and mitigation. This information is however provided within the ES Ecology Chapter the relevant paragraphs/tables for which are referenced above. There are several comments and requests for additional information that could be conditioned.

Please can you liaise with the County Ecologist in relation to the comments and advise whether the county ecologist has any further comments?

I look forward to hearing from you.

Kind Regards

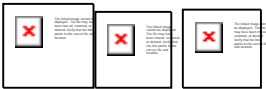
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