

The Vale of Glamorgan Council
Dock Office
Barry Docks,
Barry
CF63 4RT

Ebost/Email:
southeastplanning@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 0300 0653098

13 November 2019

Annwyl Syr/Madam / Dear Sir/Madam

BWRIAD / PROPOSAL: OUTLINE APPLICATION COMPRISING DEMOLITION OF EXISTING BUILDINGS AND ERECTION OF 44.79HA CLASS B1/B2/B8 BUSINESS PARK, CAR PARKING, LANDSCAPING, DRAINAGE INFRASTRUCTURE, BIODIVERSITY PROVISION AND ANCILLARY WORKS. ALL MATTERS RESERVED ASIDE FROM ACCESS.

LLEOLIAD / LOCATION: LAND AT MODEL FARM, PORT ROAD, RHOOSE

Thank you for referring us to the above application, which we received on 13 August 2019.

We continue to have significant concerns with the proposed development as submitted. We recommend that you should only grant planning permission if the following requirements are met and you attach conditions to the permission. Otherwise, we would object to the scheme.

Requirement 1 - European Protected Species (EPS) – further information is required to demonstrate no detrimental impacts on EPS.

Requirement 2 - Foul drainage – site to be connected to the mains sewerage system or satisfactory evidence to be provided to demonstrate that it is not reasonable to connect to mains.

Further details are given below. Please note if further information is provided to satisfy the requirements, it may then be necessary to request further conditions to avoid / mitigate environmental effects.

Requirement 1 - European Protected Species (EPS)

We note the submission of the following in support of the above outline application:

- Environmental Statement (ES) entitled 'Parc Busnes Porth Cymru. Port Road, Rhose. Environmental Statement' by RPS dated July 2019';
- 'Model Farm. Ecology Surveys Report (Report Ref ECO00138 (Rev A)' by RPS dated 11 October 2019;
- 'Model Farm – Precautionary Dormouse Strategy' by RPS dated 10 October 2019;
- 'Model Farm. Biodiversity Management Strategy' by RPS dated 25 October 2019;
- 'Preliminary Ecological Appraisal (PEA). On behalf of Legal and General (Strategic Land) Ltd. Model Farm. Port Road, Rhose' dated 24 May 2019;
- Drawing JCD0064-003 (Rev N) entitled 'Parc Busnes Porth Cymru. Indicative Concept Masterplan' by RPS dated May 2018; and
- Drawing JCD0064-006 (Rev C) entitled 'Parc Busnes Porth Cymru. Parameter Plan: Green Infrastructure' by RPS dated May 2019.

Bats

We welcome that surveys for bats have been undertaken to inform the outline application.

Bats in buildings

With regards to the surveys of bats in buildings, we note that the surveys focused on Model Farm, the farmstead in the north-west part of the application site, including the farmhouse and barn complex (comprising three single storey and two two-storey brick built buildings with tiled apex rooves, ridge tiles, timber fascias and bargeboards).

Of the buildings that were surveyed, we note that the following was observed:

- Building A – soprano pipistrelle day roost (likely non-breeding roost)
- Building C - pipistrelle day roost (likely non-breeding roost)
- Building D - soprano pipistrelle day roost (likely non-breeding roost)

We are satisfied that the proposed mitigation outlined in section 6.1.6 of the ecology surveys report would be sufficient to mitigate the loss of these roosts.

However, we note from Figure 4 in the Ecology Survey Report that the farmstead includes a number of other agricultural barns/buildings that do not appear to have been covered by the bat surveys. The PEA report suggests that they may have moderate bat roost potential. In view of this, we have significant concerns with the proposed development as submitted and seek clarification as to why these buildings were not covered by the bat surveys. We advise that they are subject to bat roost surveys. If any further roosts are likely to be lost or otherwise affected by the proposals, the application should include details of additional mitigation that will be put in place.

The information above is required to fully assess the likely impacts of the proposals on bats, European Protected Species. We would be pleased to advise further when consulted on the additional information specified above.

Requirement 2 - Foul Drainage

No additional information has been submitted in relation to this requirement. Therefore, our advice remains as set out in our letter of 6 September 2019, reference CAS-907607-W9Y2.

Additional advice in respect of European Protected Species

Bat roosts in trees

We note the survey results of bat roosts in trees. We are satisfied that the proposed mitigation outlined in section 6.1.6 of the ecology surveys report would be sufficient to mitigate for the loss of these roosts.

Bat movements through the landscape

We note that static detectors recorded a diversity of bat species using the application site, including Lesser Horseshoe bats, one of Wales' rarer species. We note that records of these were picked up in the western woodland, eastern boundary woodland and stream, and over the western field boundaries.

This emphasises the need for a well-designed development, with appropriate green infrastructure distributed across the site which will remain unlit, so as to continue to allow this (and other) species to move through the landscape.

Indicative Concept Masterplan and the 'Parameter Plan-Green Infrastructure'

We welcome the proposals to retain the existing woodland on site, as well as the two wooded corridors extending NW-SE across the site. However, we note that these will be crossed by the main spine road, and a pedestrian link (in the NE of the site). At these locations it will be important that street lighting does not compromise the animals' ability to traverse the site. Lesser horseshoe bats in particular are light sensitive. We therefore consider that a sensitive lighting design will be required which includes dark crossing points (<1lux) at these locations for a key period during the night (e.g. 11pm-5am).

Dormice

The dormouse surveys appear not to have found evidence of the species on the application site, however we welcome the preparation of the precautionary dormouse strategy in support of the application. Should planning permission be granted, we recommend that this document features in the list of approved documents that the development must comply with.

However, with records of dormice (otters and great crested newts) in the wider landscape, the proposals provide a valuable opportunity to implement appropriate long-term habitat management, to provide high quality habitats on site and allow the expansion or movement of protected species in future. We advise you to liaise with your in-house Ecologist in relation to the long-term habitat management and implementation of the Biodiversity Management Strategy. We recommend that the habitat management objectives within the Strategy are designed with dormice in mind.

Great Crested Newts

We note that great crested newts are unlikely to be affected by the proposals and therefore We have no further comments in respect of GCN.

Otters

We welcome that the stream corridors will be retained as part of the scheme design, although we note that the proposed development in the southern part of the site may come close to one such corridor. We note that otters are unlikely to be affected by the proposals, and therefore have no further comments in respect of otters.

In summary

At this juncture, further information regarding bats, European Protected Species and the proposed method of foul drainage is required, prior to the determination of the application.

At such time that the requirements noted above have been satisfactorily met, our remaining concerns could then be addressed via the imposition of conditions on any outline permission that your Authority is minded to grant. Such conditions may include, but may not be limited to, the following issues:

1. A lighting plan - to reduce the impacts of lighting to ensure the continued use of the site by protected species e.g. bats
2. Submission of details of the intersections of the green infrastructure with the roads and pedestrian routes
3. Pre-commencement species surveys
4. Secure the implementation of the 'Precautionary Dormouse Strategy' by RPS dated 10 October 2019
5. Secure the proposed mitigation outlined in section 6.1.6 of the ecology surveys report.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance. We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents relevant to their development. Please refer to our [website](#) for further details.

Should you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Mrs Claire McCorkindale
Ymgynghorydd Cynllunio Datblygu/Development Planning Advisor