

CONSULTATION RESPONSE: COUNTRYSIDE AND ENVIRONMENT (ECOLOGY)

To / I:	Operational Manager Development & Building Control	From / Oddi Wrth:	Ecology, Development Services Countryside and Economic Projects.
FAO	Mr. Ceiri Rowlands		Ms Erica Dixon
Date / Dyddiad:	7 January 2020	Tel / Ffôn:	(01446) 704855
Your Ref / Eich Cyf:	2019/00871/OUT	My Ref / Fy Cyf:	
Location	Land at Model Farm, Port Road, Rhoose		
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.		

ECOLOGY RESPONSE	
<input type="checkbox"/> No comment	<input type="checkbox"/> Notes for applicant
<input checked="" type="checkbox"/> Object (holding objection)	<input type="checkbox"/> Request for further information
<input type="checkbox"/> Object and recommend refusal	<input type="checkbox"/> Recommend planning conditions

Summary

Holding objection

We object to this application at the current time for the following reason(s)

Negative impact on priority / protected species with insufficient mitigation / compensation proposals required to demonstrate no net loss and enhancement.

Detailed Comments

These comments are made with respect to the documents submitted in support of the outline application, in particular:

- *Preliminary Ecological Appraisal, Version A, May 2019 by RPS*
- *Model Farm, Ecological Surveys Report, Revision A, October 2019*
- *NRW consultation responses (latest version 12/12/19)*

We note that NRW have no significant concerns although a licence will be required for the bat roosts; NRW have recommended the inclusion of several conditions to secure protection measures for European Protected Species.

We have concerns regarding the status of breeding birds on site. Although the survey appears to have been carried out to nationally accepted standards, there remains a high proportion of “probable” records within the results. We would expect, over the course of 3 surveys for the probable records to be confirmed as breeding or non-breeding (or failed breeding attempt). This information is required to inform future compensation/mitigation measures and must be addressed prior to determination. The results are particularly relevant to the ground-nesting birds, as the vegetation-nesting birds can be adequately compensated for through landscape planting.

The development proposals will need to demonstrate enhancement for biodiversity on the site. At the current time, there are no secure proposed enhancements. There are enhancements suggested for farmland birds, however, it is unclear as to how or where this can be delivered. We understand that the retained farmland fields will not be retained long term after construction. Therefore it appears as though the proposed mitigation is not deliverable. We would suggest that compensation / mitigation for birds is discussed further with the Vale of Glamorgan regarding the transferred land. If this option is to be pursued, then a commuted sum will need to be agreed for the ongoing management and monitoring.

We welcome the plans to extend the retained woodland, however this is not appropriate to compensate for loss of hedgerows as hedgerows are a priority habitat and any net loss would be counter to the Supplementary Planning Guidance. The hedgerows must be replaced at a minimum of 1.5:1 (gain:loss).

The development will result in the loss of a waterbody, again a priority habitat and as such, there will be a requirement for its replacement. This must be integral to the supporting information for the application, including details of location, size and construction details.

We welcome proposals for bird boxes in the woodland, however, we would recommend that the boxes are not attached to ash trees.

We note that the proposed drainage features are situated on land to be transferred to Local Authority ownership. We recommend that the applicant discuss this further with the Drainage and Engineering team of the Vale of Glamorgan Council. Please liaise with Clive Moon.

Recommendations

- 1) Address the issue of farmland / ground nesting birds on site, including confirming breeding status or alternatively providing secured breeding habitat for a minimum of 10 years post development.

- 2) Provide details of replacement waterbodies
- 3) Provide details (including location, species composition) of replacement hedgerow.
- 4) Do not erect bird boxes on ash trees
- 5) Replacement habitat for ground nesting birds – need to address issue of land ownership, responsibility for the management, and the means to secure compensation measures
- 6) Liaise with Clive Moon regarding drainage / SUDS features.

Conclusion

At the current time there are issues that need to be resolved, therefore the local authority is not currently in a position to determine this application. The above issues must be addressed prior to determination.