



Dr Peter Sturgess

Rory McLaggan

31 January 2023

Dear Rory,

### **Proposed development at Island Farm, Bridgend**

Thank you for letting me know about the proposals to develop land at Island Farm, adjacent to the Merthyr Mawr Estate. Further to your making contact I have looked at the Local Development Plan (LDP) proposals for the area and had a walk around the SINC that forms part of the site.

I have participated in many SINC reviews, for Caerphilly, Cardiff, Vale of Glamorgan and Bridgend Councils (perhaps more than anyone else in south-east Wales) and have seen the damaging effects of urban development adjacent to numerous wildlife sites. I share your concerns about the likely biodiversity impacts on the Island Farm SINC, and in the wider area, and have set out my opinions on these proposals below.

### **Island Farm SINC**

The Island Farm SINC was not one of the sites I studied in the 2011 Bridgend SINC review, so I've only had a chance to see the site in January, which is not the best time of year. However, having seen the site this week and looked at the available data there is no reason to suspect that the site has lost its Dormouse population or roosting Lesser Horseshoe Bats, so I'm sure that it continues to meet the qualifying SINC criteria and should be regarded as important for nature conservation in a county context. The site is also likely to continue to support good numbers of breeding and migratory birds, which was identified as a secondary SINC feature, and reptiles, which have previously been recorded there (despite their omission from the SINC data sheet).

#### Dormice

The LDP proposal would have a detrimental effect on the Dormouse population due to the construction of the access road. This would cause a direct loss of woodland/ scrub habitat and would create a barrier to movement of Dormice because they are unlikely to cross a road of this nature (even more so if it has any type of lighting). The potential impact on Dormice through the inevitable increase in disturbance of the SINC by people and dogs, and predation by domestic cats does not appear to have been considered in the assessment process to date and would be almost impossible to mitigate.

#### Bats

Lesser Horseshoe bats are known to be light-sensitive, and installing a new urban area near to a known roost site is likely to discourage the bats from continuing to use the area. If the site is developed as indicated in the masterplan the only potentially dark flight corridor to their roost at Hut 9 would be along the west side of the site, and even that will be disrupted by the new access route. The proposed development would limit bat feeding opportunities

for all light-sensitive species (not just Horseshoe bats) in the south of the area and may result in them abandoning existing roost sites within the SINC. The potential for vandalism and other forms of human disturbance at roost sites within the woodland would also be increased.

### Other wildlife within the SINC

The grassland areas and scrub margins within the SINC appear suitable for reptiles (particularly Slow Worm and Grass Snake, which were recorded during the surveys in 2009), yet no new surveys for them appear to have been undertaken, and the ecological appraisal by Ethos Environmental Planning has not recommended any. The impact on any reptile population should be properly assessed before this proposal is approved, especially because they may lose their habitat if tree planting is proposed in the remaining grass areas (e.g. as mitigation for Dormice or bats), and because of the likely increase in levels of predation by cats and disturbance by people and dogs.

Birds will continue to use woodland and scrub in urban areas, but the number of birds and range of species is likely to decline due to the increase in disturbance factors and loss of feeding habitat. Before the plan is approved, a proper assessment should be made of the species likely to be lost if the site is developed.

Fungi do not appear to have been considered at any stage of the ecology assessment process to date. There is abandoned pasture within the SINC that may have supported grassland fungi (such as waxcaps) until the grazing ceased approximately 15 years ago. Recent studies have found that fungi can remain unseen beneath tall vegetation for many years, so the habitat may still be recoverable if the site were to be brought back into favourable condition. An eDNA check of the fungi in the soil would help to clarify whether or not there is still a viable population of grassland fungi, so that the impact can be properly assessed before any changes are proposed to this habitat.

### **Impacts on the wider area**

It would be unreasonable to expect the new occupants of the proposed houses to remain within the housing area at all times, and there will surely be an increase in numbers of people visiting the surrounding countryside. Many of them will venture out on foot and many will be accompanied by dogs. The preferred destination for recreational walkers is far more likely to be southwards into the open countryside of the Merthyr Mawr estate than northwards into urban Bridgend. However, the potential impact of this on wildlife in the wider area does not appear to have been considered.

In the real world people do not always stick to footpaths, park in the official car-parks, keep their dogs under control or take their litter home, so it is very likely that there will be an increase in disturbance of habitats in the wider area (this will also undermine the effectiveness of the proposed mitigation for the SINC). The likely effect on biodiversity in the wider area should be properly assessed at the strategic stage of the proposals, rather than relying on individual planning applications. In any such an assessment I would suggest that the relatively undisturbed and high quality grassland, dune and woodland habitats in the Merthyr Mawr estate should carry a higher weighting than those of more typical open countryside.

### **General concerns regarding planning**

I am concerned that the development of Island Farm may not stay confined within the area shown in the current proposal for long. Once the new community is established there are likely to be calls for highway improvements to Merthyr Mawr Lane and New Inn Road, possibly with additional highway lighting requirements, further disturbing the local wildlife. Also, the green-space around urban areas is often viewed as the easiest option for installing or rerouting buried services such as gas, sewerage and electricity, resulting in periodic disruption of the habitats, and this should also be factored into the LDP assessment. The

timescale for management of any habitats required as biodiversity mitigation is also important. It is unlikely to be continued forever, as developers will pass the job over to the council at the earliest opportunity.

Planning Policy Wales makes numerous references to the requirement for enhancing biodiversity through the planning system. Amongst the requirements for development proposals (para 6.4.3) it states that they must consider the following: ....Ensure statutorily and non-statutorily designated sites are properly protected and managed; Safeguard protected and priority species and existing biodiversity assets from impacts which directly affect their nature conservation interests and compromise the resilience of ecological networks and the components which underpin them...; and, Secure enhancement of and improvements to ecosystem resilience by improving diversity, condition, extent and connectivity of ecological networks.” It then goes on to say that ‘Where adverse effects on the environment cannot be avoided or mitigated, it will be necessary to refuse planning permission’. In this situation I cannot see how the potential impacts to the SINC or the wider area can be adequately mitigated, and the current proposals will certainly not result in an enhancement of biodiversity, so I hope that they will be rejected unless they are subject to significant modification.

### **Possible options for more effective mitigation**

If the proposals for Island Farm are not turned down, and the area is allocated for development despite the planning guidance, there may still be ways that the impact on biodiversity can be reduced, at least locally. My primary recommendation would be to reduce the number of houses and increase the area set aside for habitat creation and management. I would also suggest concentrating as much of the new building as possible in the north of the area, so that the southern part could be freed up to form a wider buffer strip to the north of New Inn Road, with dense planting to provide new habitat for Dormice, maintain flight corridors for bats and screen the surrounding habitats from light pollution.

At a smaller scale there are several things that can potentially be done toward ecological mitigation, such as use of nest boxes and bat roosts, creating ponds and log piles, eradicating the Himalayan Balsam, managing the grassland, and trying to avoid gardens that back directly onto SINC habitats (to reduce tipping and garden extensions), but these will generally not be sufficient to address the bigger, long term issues of biodiversity loss that should be dealt with at the strategic level.

I hope that the above helps as you try to resist the likely loss of biodiversity that would result from this current proposal.

Yours sincerely,



Dr Peter Sturgess CEnv MCIEEM