

Our ref: P24-460 Mynydd Maen Request for Further Clarification Response - 14 February 2025

Your ref: DNS/3276725

14 February 2025

Elliot Smith  
RES Ltd

By email only

Dear Elliot

**Re: Request for Further Clarification of Mynydd Maen Environmental Statement**

Thank you for asking BSG Ecology to provide further information to respond to the Inspector's request for further clarification regarding the submitted Environmental Statement.

Responses to the Inspector's initial comments on the submitted Environmental Statement (of 05 November 2024) were included in our letter response of 25 November 2024. Two further clarifications with regard to ecology have been requested by the Inspector, in his letter of 14 January 2025. The required information is set out in this letter.

**Paragraph 11 (and Annex 1 bullet point 3)**

In the Inspector's initial assessment of the submitted Environmental Statement, the Inspector noted that *"much survey work to support the application was completed during and prior to 2022, resulting in it being more than two years old. The Inspector requests further information as to why the results of these surveys continue to provide a robust baseline that reflects current environmental conditions."*

A response to this comment was provided in our letter of 25 November 2024. The Inspector has confirmed that the information provided in the letter *"provides an explanation of why Ecological and Ornithological Surveys now over two years old are considered to still provide robust evidence for current baseline environmental conditions."* However, he also states that *"clarification of when the Bat Activity Survey and Meteorological Data Collection was carried out and an assessment of their robustness if required, has not been provided."*

Section 6.14.72 of the Ecology ES Chapter sets out that bat activity was sampled using static detectors in Spring, Summer and Autumn 2021. The specific dates were 26 April - 05 May, 06 July - 15 July and 03 September - 12 September 2021 (all dates inclusive). Meteorological data was collected simultaneously with the static detector deployments.

**Paragraph 12 (and Annex 1 bullet point 4)**

In the Inspector's initial assessment of the submitted Environmental Statement, the Inspector stated that *"the Phase 1 habitat survey area does not cover the entirety of the Site boundary. The Inspector refers to Figure 6.1 which demonstrates this."*

The Inspector also made two further points on coverage:

- *"The areas for two new tracks and widening works along the Abercarn Mountain Road as shown in Figure 10.3, where hedgerow and/or tree removal may be required, does not appear to be included in the Phase 1 survey."*

- “Whether the Ground Level Tree Assessment and subsequent Close Inspections included in Technical Appendix 6.3 have included these areas is also unclear as tree locations are not provided.”

In the Inspector’s second letter requesting further clarification regarding the Environmental Statement, the Inspector stated:

- “The blue dotted ‘Survey Area’ line shown on the submitted Figure 6.1 ‘Phase 1 Habitat Survey Area’, referred to in the Ecologist letter, does not include all access works to the Abercarn Mountain Road as stated. Figure 6.1 therefore conflicts with the clarification provided within the Ecologist letter regarding the Ground Level Tree Assessment and subsequent Close Inspection coverage. Further explanation of the reasons for this inconsistency, or its correction is therefore required.”

The Site ‘red line’ boundary (as shown on Figure 6.1) includes three plots adjacent to the Abercarn Mountain Road, within which access works are to be undertaken: a western plot (centred on Ordnance Survey Grid Reference (OSGR) ST 22597 98419); a central plot (centred on OSGR ST 22597 98419); and an eastern plot (centred on OSGR ST 23162 98270).

The appended Figure (Figure 1: Abercarn Mountain Road Works Areas) shows the Phase 1 Survey Area, the three plots of the Site boundary adjacent to the Abercarn Mountain Road and the Abercarn Mountain Road with works areas demarcated (at high resolution). In addition, Figure 6.1 has been updated to show the Phase 1 Survey Area along the Abercarn Mountain Road (not shown on that figure previously), for clarity.

The inspector is correct that parts of two of the plots, namely the northern part of the central plot, and the south-western part of the eastern plot<sup>1</sup> fall outside the Phase 1 survey area. While within the Site ‘red line’ boundary however, they will not be impacted by the proposed works. For further clarity, we can confirm that the Phase 1 Survey Area included all of the proposed works areas along the Abercarn Mountain Road.

The ground level tree assessment covered the whole of the Phase 1 Survey Area. As noted in Section 6.12.17 of the Ecology Chapter of the Environmental Statement, all trees with any potential to support roosting bats along the access route could be thoroughly inspected from ground level (no climbed assessment was required). No evidence of roosting bats was found. The trees that were subject to ground level inspection and were found to have some potential to support roosting bats are shown on Figures 6.2a and 6.2b. Scrub (with no bat roost potential), and any trees outside of the footprint of the works were not inspected.

Yours sincerely

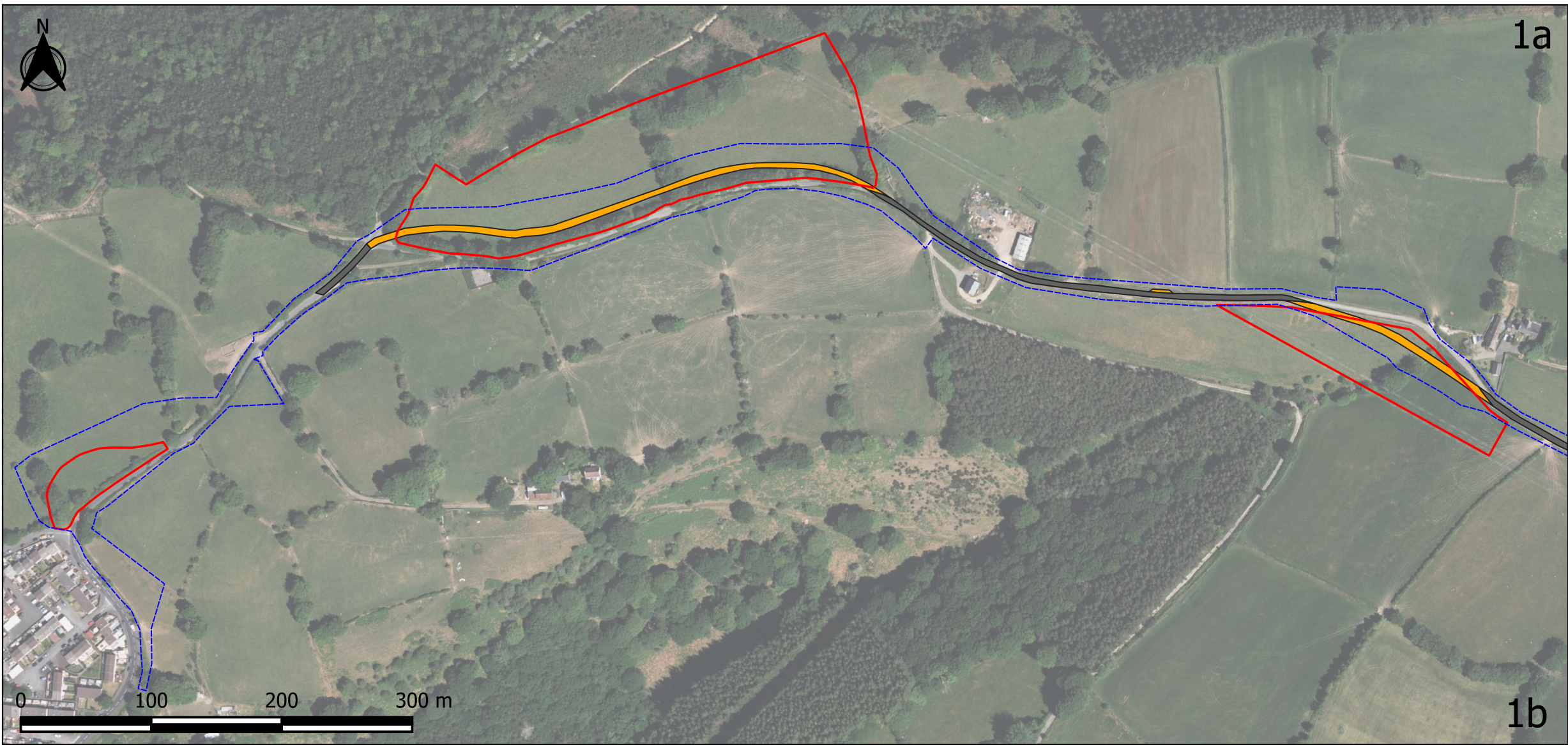
James Garside





Senior Ecologist

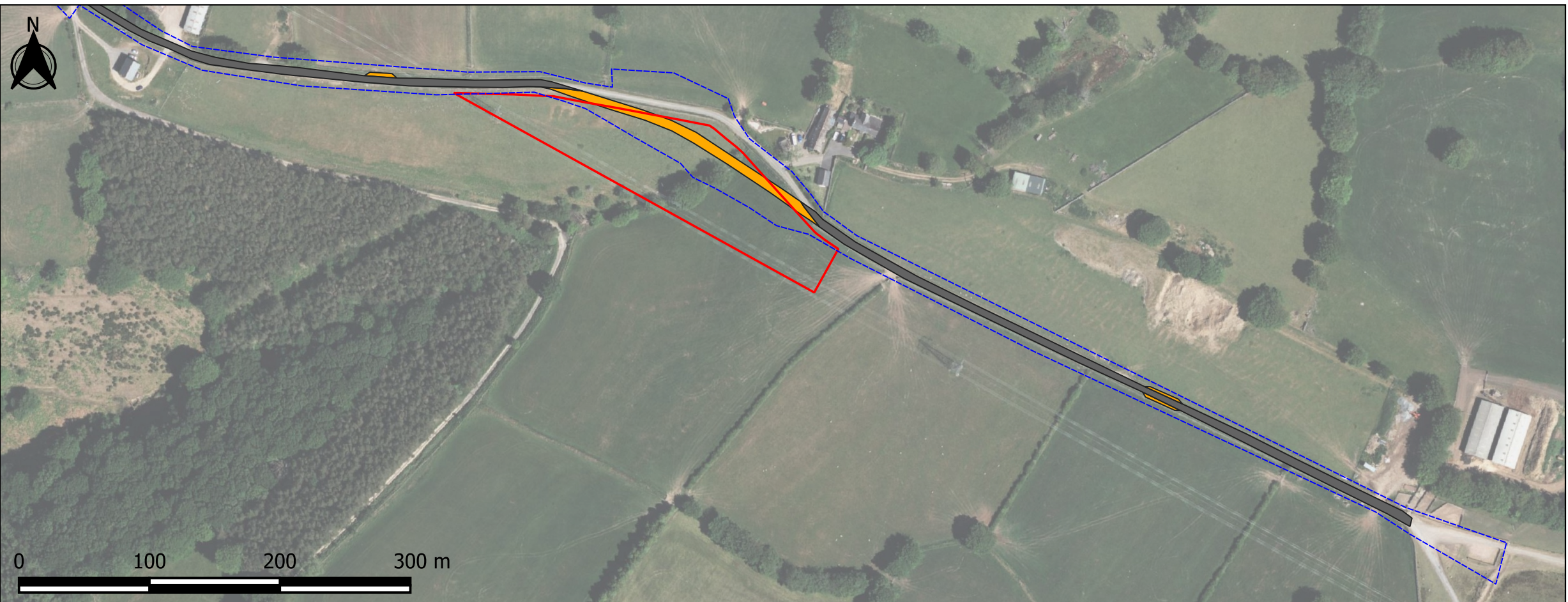
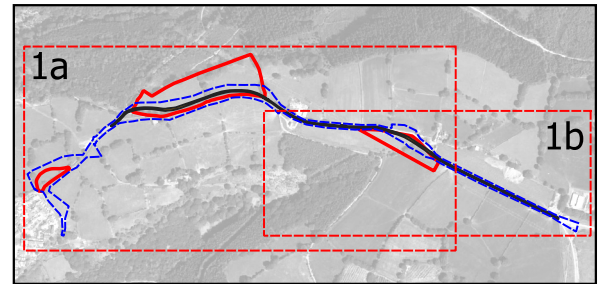
For and on behalf of BSG Ecology

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<sup>1</sup> All of the western plot falls within the Phase 1 Survey Area.



- Legend
-  Existing Access Track
  -  Proposed Access Track
  -  Survey Area
  -  Site Boundary



**BSG** | ecology

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JOB REF: P24-460

PROJECT TITLE  
MYNYDD MAEN

DRAWING TITLE  
Figure 1: Abercarn Mountain Road Works Areas

DATE: 13/02/2025      CHECKED: JAG      SCALE: 1:2,800  
DRAWN: CS      APPROVED: OG      VERSION: 1.5

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