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Mr Richard Duggan BSc (Hons), DipTP, MRTPI
% Programme Officer
Council Office
Shirehall Street
Caernarfon
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Date: 11 April 2017
Our 2016.024
Ref:

Dear Sirs,

RE: Hearing Session 10 relating to Policy TAI16 – housing allocations in Bethel (Gwynedd)

We thank you for the opportunity to provide our response to new information submitted by the Councils under S10/PG1. The following comments are provided by Stuart Kato B.Sc. (Hons.) M.Sc. MCIEEM, Director of Eco-scope in response to the Councils.

“We agree with the Council report that both sites T71 (Land opposite Rhoslan Estate) and Site T58 (land at Saron) are of wildlife value. The council report does not provide any evidence to support the statement that the proposed development area at the front of site T71 is of lesser habitat value than the rear. This is important as the argument presented by the councils, use this as a reason why this site is of lesser ecological value than the T58 fields. Our observations on site did not highlight any significant difference between the front and rear of the site. In addition, the development of the T71 site is likely to involve the loss of a hedgerow alongside the highway. The impacts of this have not been considered in the Councils report. The ecological importance of T71 in combination with other issues affecting this site including poor highways access in our opinion make site T71 a poor development option in light of the other options.

Point 5.3 notes that the fields had been cut before the 1st July 2016, we understand that this is a usual management practice for these fields. In addition, we understand that these fields are regularly fertilised and managed as farmland.

We accept the findings of the survey undertaken by Emily Meilleur on the 13th June. Our survey undertaken earlier in the same year did find some indicator species but we considered the fields to be a poor example of lowland meadow, all be it the only example in the locality.

Section 5.4 of the report is contradictory in stating that its own botanical surveys can be carried out until October. The optimal survey period is June with the survey reliability decreasing either side of this month.

Development of the T70 site and part of the T58 site would meet the housing need, retain the important habitats present at the T71 site, which has a number of reasons against development other than ecology. This would provide an opportunity for enhancing and managing the remaining fields at T58 for wildflower meadow through planning condition or similar. It would be possible to retain the best parts of the meadow affected by proposed development by the translocation of these turfs to poorer areas of the remaining fields. This is a simple procedure and will result in a better quality habitat on the T58 site. Going forward, a mechanism to ensure suitable management (possibly through a 25-year management plan) could be implemented as part of the consent. Without some development on this site continued, appropriate management will be reliant on goodwill from the landowner.”

We hope that these comments are useful to inform your decision with regards to the allocation of housing in Bethel (Gwynedd).

Yours sincerely,

p. p. *S. E. Edwards*

Rhys Davies BA (Hons) MRTPI

Director