

ARC BUILDING & PROJECT MANAGEMENT LTD

PROPOSED DAYS RENTAL SITE, CARDIFF

ECOLOGICAL MITIGATION & ENHANCEMENT STRATEGY



JUNE 2025

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DOCUMENT REF: E24129301 / DOC 02 – June 2025

Issue	Revision	Stage	Date	Prepared by	Approved by	Signed
1	-	Draft for review	13 June 2025	Ben Satherley (Senior Ecologist)	Dr. M. Watts (Director)	M. WATTS

ECOLOGICAL MITIGATION & ENHANCEMENT STRATEGY

PROPOSED DAYS RENTAL SITE, CARDIFF

Background

Soltys Brewster Ecology (SBE) were commissioned by ARC Building & Project Management Ltd to produce an Ecological Mitigation and Enhancement Strategy for a parcel of land found adjacent to Holden Road in Leckwith Industrial Estate, Cardiff (central grid reference: ST 16568 74667). The site has been proposed for development in the form of a new garage/car workshop with associated parking bays and a vehicle compound (planning reference: 25/00439/FUL).

The site's baseline ecological conditions were established via a preliminary ecological appraisal comprising of a desk-based consultation and an Extended Phase 1 Habitat survey undertaken in December 2024¹. The survey work revealed a limited number of habitats present at the site, all of which were typically associated with recently colonised brownfield land. The site was covered in a mosaic of young colonising *Buddleia* *Buddleja davidii* scrub with small patches of hardstanding, bare ground, ruderal and ephemeral/short perennial vegetation also present. No priority listed habitats were identified at or immediately adjacent to the site.

The requirement for developments to provide a 'net gain in biodiversity' is outlined in the latest edition (February 2024) of Planning Policy Wales (PPW): Chapter 6. This new guidance provides an update on Net Benefit for Biodiversity and the Step-wise Approach, with paragraphs 6.4.11 and 6.4.16 stating that:

'Planning authorities must follow a step- wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.'

All development must deliver a net benefit for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed). Even if the biodiversity value has been maintained, there must still be a pro-active process to look for and secure enhancement through the design and implementation of the development.'

¹ Soltys Brewster Ecology (SBE) (2024). *Proposed Days Rental Site, Cardiff. Preliminary Ecological Appraisal*. Report Reference: E24129301/DOC 01. Dated: 11th February 2025.

Vegetation across the site was last cleared in 2020 by a previous owner. The latest edition (February 2024) of PPW also highlights a new policy regarding pre-emptive site clearances, with section 6.4.16 stating that: *‘Potential applicants should not conduct any pre-emptive site clearance works before submitting a planning application as this can make it more difficult for a development proposal to secure a net benefit for biodiversity. Where a site has been cleared prior to development its biodiversity value should be deemed to have been as it was before any site investigations or clearance took place. A net benefit for biodiversity must be achieved from that point. Habitat status can be established through evidence remaining on site and local desk-based assessments (planning authorities must ensure that they have access to these data sources). In such cases, habitat status will be presumed to be good in the absence of any evidence to the contrary.’* No such policy was included in the previous editions (December 2018 & February 2021) of PPW.

However, as the site clearance works were completed prior to the release of the latest PPW, and by the previous landowner², the current site conditions (i.e. those recorded in December 2024) are considered to be an appropriate baseline from which biodiversity enhancement and net-benefit should be assessed.

Therefore in accordance with PPW and Policies EN6 and KP16 of Cardiff Council’s Adopted Local Development Plan (LDP), the current document sets out appropriate mitigation and enhancement measures for the scheme which are considered to be proportionate to the scale and nature of the development proposed.

² The current applicant acquired the site on 22nd July 2024.

Ecological Mitigation & Enhancement Measures

Sensitive Vegetation Clearance Measures – Common Herpetofauna

The 2024 PEA concluded that the site holds low suitability for use by common herpetofauna (reptiles and amphibians). All common species of reptiles are protected from intentional killing and injuring under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). The scheme shall therefore adopt a sensitive clearance strategy to minimise any potential risks and to encourage any reptiles or amphibians away from areas where they may be harmed. Vegetation within the construction footprint will be cleared when reptiles are active (typically late March – September/October) and via a two-stage process. The established scrub vegetation will initially be cut down to 300mm using hand tools or a low-pressure mower/machine only. Any remaining low lying non-woody vegetation (e.g. ruderal vegetation) will then be cleared in one phase down to 50mm, again using hand tools or a low-pressure mower only. This cutting will be undertaken in a directional manner, from north/east to south/west, to encourage any animals present to disperse towards the ecology buffer zone and retained vegetation adjacent to this boundary. Arisings will be removed immediately from the construction zone following each cut. If vegetation clearance during the active period is not possible, the scrub could be cut to 300mm over winter with arisings removed, with a second directional cut as described above possible from spring (March/April) – in this scenario, no ground-breaking or disturbance works shall be undertaken within the cut area over winter (Nov – Feb. inclusive) so as to minimise risks to hibernating reptiles (or amphibians).

Following completion of vegetation clearance, any refugia, metal objects and other suitable reptile habitat found at the site including log, brash and rock piles, will be removed under the direct supervision of a suitably qualified ecologist – removal of these features would only be possible during the reptile/amphibian active period. In the case that any reptiles (or amphibians) are found then these would be carefully captured by hand by the project ecologist and transported to and released in suitable habitats found away from the construction footprint and where cover from predators is available (e.g. retained vegetation adjacent to southern/western boundary).

Sensitive Vegetation Clearance Measures – Nesting Birds

The habitats found at the site (i.e. colonising scrub) hold suitability for tree/scrub nesting bird species, with a small number of birds heard/seen at the site during the 2024 Extended Phase 1 Habitat survey including Chaffinch *Fringilla coelebs*, Common Gull *Larus canus*, Herring Gull *Larus argentatus*, Pied Wagtail *Motacilla alba*, Robin *Erithacus rubecula*, Dunnock *Prunella modularis*, and Blue Tit *Cyanistes caeruleus*. In order to limit potential impacts to nesting birds, initial vegetation clearance works will be undertaken outside the breeding bird season (i.e. clearance possible October – February inclusive). Where works within the breeding season are unavoidable, any vegetation clearance will be immediately preceded by a

thorough check for the presence of nesting birds by a suitably experienced ecologist. In the event an active nest is discovered, an appropriate exclusion zone (minimum 3m) around the nest will be determined and clearly demarcated by the ecologist. No works will be carried out within the exclusion zone until the ecologist confirms that any chicks have fledged, and the nest is no longer in use.

Sensitive Vegetation Clearance Measures – Badgers

Survey work to date has found no evidence to suggest current use of the site by Badger *Meles meles* (e.g. setts, latrines or footprints) however, the irregular use of this species, although unlikely, could not be precluded. In the unlikely event that a Badger sett is discovered within or immediately adjacent (within 30m) to the construction zone during vegetation clearance works, all works will immediately cease, and the project ecologist or National Resources Wales (NRW) will be contacted for advice on how to proceed.

Measures To Protect Wildlife During the Construction Phase

Without appropriate mitigation measures, construction activities such as storage of materials, movement of heavy plant and creation of deep excavations have potential to kill or injure any protected/priority listed species that may be present on site.

During the construction phase, any materials such as netting, wiring or cutting tools and any toxic materials or chemicals will not be left in the works area where they might cause injury or poisoning to wildlife. Such materials will be stored overnight in an appropriate location which is inaccessible to wildlife such as Hedgehog *Erinaceus europaeus* (e.g. within a locked storage unit). Any chemical spills will be cleaned up immediately, and appropriate measures to minimise the risk of spillage will be followed. Further details of these measures could be set out in a Construction Environmental Management Plan (CEMP).

Any open excavations, trenches etc. deeper than 300mm and with a bank of 45° or greater will be covered up at night or installed with an escape ladder. The escape ladder will be a wooden board (minimum 300mm wide), set at a shallow angle that would allow any trapped animal to easily climb out of excavations. Any excavations/pits will be inspected each morning during the construction phase to check if any wildlife have become trapped overnight, in which case the project ecologist should be contacted immediately for further advice.

Any temporary exposed open pipe will be capped in such a way as to prevent any wildlife gaining access. At the start of each working day any such pipe will be checked to ensure that caps have remained in place and no animals are present prior to their movement or use.

No piles of brash, cut vegetation or similar will be left in the construction area, or within areas where they are likely to be disturbed, to avoid inadvertent creation of potential nesting/hibernation sites for Hedgehogs (and other wildlife).

Ecology Buffer Zone

The proposed development will require the clearance of the successional scrub and early colonising (ephemeral/short perennial) vegetation that currently occupies the site. In order to compensate for this loss, the scheme is to provide a dedicated ecology buffer zone along the southern/western site boundaries (as seen on the Ecological Enhancement Plan in Appendix I).

This buffer zone shall consist of a hedgerow, scrub and grassland ecotone. A species-rich hedgerow shall be planted along the full length of the southern/western boundaries and along a section of the eastern boundary (approx. 255m total in length), with this comprising entirely of native species of known benefit to local wildlife including Hazel *Corylus avellana*, Hawthorn *Crataegus monogyna*, Holly *Ilex aquifolium*, Blackthorn *Prunus spinosa*, Dog Rose *Rosa canina* and Guelder Rose *Viburnum opulus*. A native shrub mix (measuring approx. 811m² in size) will be planted directly adjacent to the hedgerow, using the species as noted above with the addition of other native species including Field Maple *Acer campestre*, Common Dogwood *Cornus sanguinea* and Elder *Sambucus nigra*. The shrubs shall be planted approximately 1no. plant per square meter, allowing the formation of a structurally diverse scrub layer which would be of benefit to a wide variety of wildlife. A total of 22no. native trees will be planted within the scrub/shrub layer, using species with comparatively narrow/compact canopy layers so as not to cause overshadowing and subsequent degradation of the adjacent habitats. Finally, a species-rich grassland (measuring approx. 720m² in size) will then be created adjacent to the hedgerow/shrub layers using a suitable wildflower meadow mix (Germinal 'WFG20 Eco Species Rich Lawn' mix).

This buffer zone will help contribute to the local green infrastructure (GI) network; provide a possible commuting corridor for bats and other wildlife; compensate for any loss of foraging habitats for pollinators and other invertebrates; and provide benefits to local biodiversity in general. The habitats to be provided in the buffer zone are considered to represent an enhancement in comparison to the current site conditions, and therefore the retention of existing habitat (i.e. Buddleia scrub with emerging ruderal and ephemeral/short perennial vegetation) would not be considered appropriate for the scheme.

In addition to the ecology buffer zone, an additional 23no. ornamental trees and 18m of native species-poor hedgerow are to be provided elsewhere across the site – the landscape features are detailed in full

on the Landscape Planting Plan³. Management of the newly created habitats will be undertaken in accordance with the Landscape Management Plan⁴.

Removal of Invasive Species

The 2024 PEA confirmed the presence of Japanese Knotweed *Fallopia japonica* within the site boundaries. This is a non-native invasive plant species listed on Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) and is likely to continue spreading throughout the site if left unmanaged, further reducing the site's biodiversity value. Specialist advice shall be sought so as to eradicate this species from the site boundaries. Although not listed on Schedule 9, both Buddleia and Cherry Laurel *Prunus laurocerasus* are also considered to be particularly invasive and can spread rapidly if left unmanaged, often to the detriment of local ground flora/plant communities. Any stands of these species shall also be removed from the site as part of site clearance works.

Nesting Birds

In order to compensate for any loss of nesting habitat at the site, the scheme will provide six new bird boxes as follows:

- 2no. Vivara Pro Seville 28mm WoodStone® Nest Box (found at <https://www.nhbs.com/vivara-pro-seville-28mm-woodstone-nest-box>)
- 2no. Vivara Pro Seville 32mm WoodStone® Nest Box (found at: <https://www.nhbs.com/vivara-pro-seville-32mm-woodstone-nest-box>)
- 2no. Vivara Pro Barcelona WoodStone® Open Nest Box (found at: <https://www.nhbs.com/vivara-pro-barcelona-woodstone-open-nest-box>)

The models chosen are known to be readily used by a wide variety of species such as House Sparrows *Passer domesticus*, Starlings *Sturnus Vulgaris*, Song Thrush *Turdus philomelos*, Blackbirds *Turdus merula*, Blue Tits *Cyanistes Caeruleus*, Great Tits *Parus Major* and Nuthatches *Sitta Europaea*. The selection of Woodstone/Woodcrete models is recommended based on their long-term durability and limited maintenance requirements.

As there are no trees within the site boundaries and limited suitable locations to site boxes on the proposed building, the bird boxes shall be installed directly upon the boundary/security fencing within the

³ DEP Landscape Architecture (2025). *Days Rental, Holden Road, Cardiff. Landscape Planting Plan*. Drawing no. 5642 / 01. Dated: February 2025.

⁴ DEP Landscape Architecture (2025). *Days Rental, Holden Road, Cardiff. Landscape Management Plan*. Dated: February 2025.

ecology buffer zone (facing into the site). The boxes should be installed at the top of the fence (minimum height of 2m) and orientated away from direct sunlight (i.e. not facing directly southwards). Indicative locations for the placement of bird boxes are illustrated on the Ecological Enhancement Plan included in Appendix I. Once installed, the bird boxes should not be disturbed during the bird nesting season which runs from March to September.

The additional tree, grassland and scrub/shrub planting will provide further foraging and nesting opportunities for local bird populations in the medium – long term.

Roosting Bats

The habitats recorded at the site in 2024 were considered to hold low suitability for foraging/commuting bats, although the site lacks any features suitable for use by roosting bats, with no mature trees, buildings or other potential roosting features present within the site boundaries. In order to provide additional roosting opportunities for bats at the site, the scheme shall provide two new bats boxes as follows:

- 2no. Vivara Pro WoodStone® Bat Box (or similar design for use by crevice dwelling species, available at: <https://www.nhbs.com/vivara-pro-woodstone-bat-box>)

Again, the selection of woodstone/woodcrete fabricated models is recommended based on their long-term durability and limited maintenance requirements. Given that the site is already impacted by artificial light from existing lighting columns/lanterns within the adjacent industrial plots and along Holden Road, the bat boxes are only likely to be used by species known to be relatively tolerant of artificial light such as Pipistrelles.

Similarly to the bird boxes, there are currently limited opportunities to install the bat boxes within the site boundaries – there are no existing trees these could be sited on; little available locations within/upon the proposed building; and the boundary/security fencing is likely to be too short for use. As such, a wooden/metal pole is to be installed within the ecology buffer zone, upon which the bat boxes will be hung. The boxes will be sited as high up on the pole as possible, at a height of at least 3m from ground level, with each box facing out into a different direction. Alternatively, a purpose-built pole mounted bat box could be provided (see example design at: <https://www.nhbs.com/pole-mounted-maternity-bat-box>). Once installed the bat boxes should be treated as active bat roosts and therefore cannot be disturbed unless under licence from National Resources Wales (NRW) or evidenced (via inspection by a licensed ecologist) that they are not active. The indicative location for the purpose-built pole is illustrated on the plan included in Appendix I.

The additional tree, grassland and scrub/shrub planting will provide further foraging and roosting opportunities for local bat populations in the medium – long term.

Hedgehogs

In order to maintain connectivity across the site for Hedgehogs and other wildlife (e.g. other small mammals or common reptiles/amphibians), the boundary/security fence found along site's southern and western boundaries, adjacent to the ecology buffer zone, will incorporate regular gaps of 130mm x 130mm along its base. This design is in line with the 'hedgehog street'⁵ principle advised by Peoples Trust for Endangered Species (PTES) and other conservation groups. The indicative locations for Hedgehog highways/passages are illustrated on the plan included in Appendix I.

Additional shelter opportunities for Hedgehog will be provided at the site, with the scheme to provide a hedgehog home within the ecology buffer zone (example design found at: <https://www.nhbs.com/igloo-hedgehog-home>). The Hedgehog box will be placed in quiet, shady and secluded location, away from publicly accessible areas or any other areas that are likely to be regularly disturbed by site operatives/members of the public. The box will be orientated east or south facing to shield its entrance from bad weather and ideally will be incorporated into a log pile or compost heap or covered in leaf litter so as to provide further shelter and protection from the elements and/or predators and members of the public. A suggested location for the Hedgehog home is shown on the plan included in Appendix I.

Common Herpetofauna

In order to compensate for any loss of shelter/refuge opportunities at the site for common herpetofauna, a total of 2no. log/brush piles and 1no. stone pile will be installed within the ecology buffer zone. The log/brush piles will be created so that they are at least 2m long x 1 wide x 0.5m tall and could comprise of materials sourced from site/vegetation clearance works. The stone pile will be created using large, heavy stones to minimise risk of disturbance/removal by site operatives/members of the public and will also be a minimum of 2m long x 1m wide x 0.5m tall. Materials for the stone pile could be sourced from within the site with additional stones brought in as required. Suggested locations for these refuges are illustrated on the Ecological Enhancement Plan in Appendix I.

The creation of a species-rich grassland and scrub ecotone within the ecology buffer zone will provide continued opportunities for basking, foraging and shelter in order to support the continued use of the site by small numbers of reptiles and amphibians post development.

⁵ See: <https://www.hedgehogstreet.org/help-hedgehogs/link-your-garden/>

Invertebrates

Although considered invasive if left unmanaged, Buddleia is known to attract a wide variety of bees, butterflies/moths and other pollinators, with the existing ruderal and ephemeral/short perennial also likely supporting a range of common invertebrate species. The structurally diverse and species-rich ecotone planting will help compensate for any loss of foraging habitats for local invertebrate populations. In order to provide additional refuge opportunities for invertebrates, the scheme shall provide an additional 3no. insect/bug hotels within the ecology buffer zone. Suitable models include the Woodstone® Insect block and the Schwegler Insect Nesting Aid. These boxes could be sited on newly planted trees or upon the boundary/security fencing.

APPENDIX I ECOLOGICAL ENHANCEMENT PLAN

