

Hello Grant, insofar as the condition refers to avoidance of harm to dormice during site clearance, and that clearance has already taken place, then I cannot object to removal of this condition as it is worded.

However I do not agree with some aspects of the 'Dormouse memo' dated 23rd April 2025. For example, the Dormouse Memo includes '*...it should be noted that records of dormice within 200m of the site were not available at the time of ecological assessment and were therefore not factored into the project prior to this point.*'. However, a decision as to whether to survey for dormice or to mitigate impacts upon them should be based upon the suitability of the habitat affected, not upon the proximity of the nearest records for that species. Whether the nearest record is 600m or 200m away from the site is immaterial; the species is known to occur in the vicinity, there is good habitat connectivity and the habitat on site is suitable. The absence of a record on site, or within 200m of the site, is not evidence of the absence of this species on site.

In relation to the vegetation on site to be cleared, the Dormouse Memo includes '*...the removal of this vegetation was made clear in the submitted (and subsequently approved) documents supporting that Prior Notification application.*'. This application 23/0889 includes in Fig. 1.1 Site Plan of the Demolition Phase Environmental Management Plan CW01 Issue 3, the following:-



The phrase '*Site boundary runs through mature vegetation, hoarding erected within site to avoid disturbance*', together with the image showing the red line boundary excluding that vegetation, is strongly suggestive of the site hoarding avoiding the need to remove any vegetation to install it. This is at odds with the assertion above that the Prior Notice of Demolition application 'made clear' that this vegetation was to be removed, and subsequently my comment that '*There are no habitats within the red line boundary that I would be concerned about in terms of significant ecological impacts*' in my consultation response of 25th October 2023.

I disagree with the assertion that '*... the vegetation was not of significant interest to dormice for food or nesting...*', as this area is variously described as 'mature vegetation', and 'dense, continuous scrub', which in this area of South Wales is typical habitat for Dormice.

The vegetation which was cleared was done under a watching brief by Laura Thurel of Rider Levett Bucknall. Whilst I have been unable to verify Ms Thurel's qualifications and experience, with a destructive search such as this there is always scope to fail to detect very small animals such as Dormice or their nests, which can be very cryptic. I note that the clearance of the vegetation was undertaken in 2 stages to allow any fauna to dissipate. If these two stages took place during the

Dormouse active season, then there is a real risk that Dormice or even nests with young were harmed during that clearance. Normally for a two-stage clearance I would expect that above-ground vegetation is cleared in winter, when Dormice are hibernating at ground level, and then roots and stumps cleared in Spring, when Dormice have awoken from hibernation and made their way to retained vegetation nearby. If this were the clearance method employed, then I would have no concerns, but a two-stage clearance in the active season would not reduce the risk of harm to Dormice.

While I cannot object to removal of planning condition 6 of 24/0006, because the vegetation has already been cleared, it is nevertheless a serious concern that clearance of habitat suitable for a European Protected Species has taken place in the absence of a plan to do so without harming individual animals, thereby circumventing the reason for which I asked for the condition in the first place.

Matt Harris

Ecology Officer