

Lisa Contestabile
Civil Engineer
Powys County Council
Powys County Hall
Spa Road East
Llandrindod Wells
LD1 5LG

31st July 2020

Our Ref: RT-MME-153223-01

Dear Lisa,

Addendum Ecology Note for Recycling Bulking Facility at Abermule Business Park

Further to our recent conversation I am writing to provide my professional assessment of the potential for the Recycling Bulking Facility at Abermule Business Park to impact upon the following notable species during its operational phase:

- European eel *Anguilla anguilla*;
- Sea/brown trout *Salmo trutta*; and,
- Atlantic salmon *Salmo salar*.

These three species have been raised as a potential consideration by Laura Samuel (Waste and Recycling Strategy Team, Powys County Council) but were not specifically discussed in a series of baseline ecological studies completed for the site by Gerald Longley Ecological Consultants in 2017.

All three of the species listed above will utilise saline and freshwater habitats at different stages of their lifecycle. The site at Abermule Business Park provides no habitat for any of these species in its current state, with the nearest suitable habitat the Afon Hafren/River Severn located c. 130 m to the north-west at its nearest point. Whilst European eels are known to forage terrestrially on occasion, the likelihood of this species accessing the Abermule Business Park is negligible. Both salmonid species listed above are wholly aquatic and are at no risk of any direct impact from the ongoing operation of the site.

The only pathway via which the operational activity of the Recycling Bulking Facility could potentially have an indirect impact on the aforementioned fish species would be as a result of foul water, pollution etc. entering the Afon Hafren/River Severn, however the overall level of risk is considered to be extremely low. The risk can be avoided completely by ensuring that all foul drainage associated with the operational site is managed in accordance with best practice. A precautionary recommendation is made below.

R1 Guidance produced by Natural Resources Wales (NRW), the Northern Ireland Environment Agency (NIEA) and the Scottish Environment Protection Agency (SEPA) for Pollution Prevention should be adhered to throughout the works. GPP5, which relates to works and maintenance in or near water, is of relevance to the proposed project. This document provides guidance for carrying out works or activities in or near the water environment which may have the potential to cause pollution, transfer non-native species and can impact on the bed and banks of a watercourse.

If the above recommendation is followed no adverse impacts on any fish species are predicted.

Yours sincerely,

For and On Behalf of Middlemarch Environmental Ltd.



Tom Docker CEcol MCIEEM
Managing Director