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From: [REDACTED]

Sent: 19 May 2022 09:35

To: [REDACTED]

Subject: EIA Agriculture - Tip-Off - T018 2022 - Brynhyfryd - Haverfordwest - 2022 opinions on outcome of visit ?

Hi all,

I would appreciate opinions on the following TO case:

WG received reports of ploughing permanent pasture & spraying off to kill off semi natural grassland without EIA screening at land recently purchased by [REDACTED] at The Rhos by Picton. In addition, reports of increasing size of field ditch boundary significantly without EIA screening. Also removing sections of hedge banks (tree felling).

Fields in question have all been re seeded with improved grassland species/maize/barley to provide fodder for housed dairy cattle off site.

SM9914 5670 & SM9914 4373

These parcels had been cultivated & re seeded with improved grassland species. There was evidence of semi natural habitat within these parcels such as remnant *Juncus effusus*, *Ranunculus repens*, *Holcus lanatus*, *Fillipendula ulmaria*.

[REDACTED] confirmed he had employed an agronomist to survey the site before carrying out improvement works & provided a copy of his survey. The survey states the parcels contained ryegrass, cocksfoot & timothy & a high density of soft rush. The survey results did not provide % cover for grass species.

The past aerial photos from 2000-2020 indicate that these parcels were semi natural. In addition in 2006 these parcels were mapped by myself for the previous owners Tir Gofal agreement & were found to be areas of marshy grassland (in the northern half of the parcel & semi-improved grassland in the southern half of these parcels. [REDACTED] had been told by his neighbour that these parcels had been ploughed 12 years ago.

However, the evidence does seem to show that these 2 parcels were semi natural prior to cultivation & should have gone through EIA screening. Therefore, these parcels will be referred to RIW as a breach for not submitting an EIA screening prior to cultivating.

SM9914 5158

Was found to be improved land & had been sown with a maize crop.

Hi [REDACTED] – I would say that you have evidence of the land being semi-natural on those parcels that you had seen yourself for TG purposes. I'd also question the agronomist's view for the other areas: 'ryegrass, cocksfoot & timothy & a high density of soft rush' doesn't necessarily mean the land is improved. He may have mistaken Timothy for Meadow Foxtail.

However, proving it is the issue. If there is a high density of soft rush, backed up by the sat pics, then it could easily have been semi-natural, especially if there's meadowsweet in there. I would ask the agronomist (directly, not through the farmer) to clarify his statement and go from there.

Cheers

[REDACTED]

[REDACTED] **MCIEEM**
Environmental Impact Ecologist
Plant Health & Environmental Protection Branch (PHEPB)

Land, Nature & Forestry Division (LNFD)
Welsh Government
Government Buildings
Picton Terrace
Carmarthen
SA31 3BT

Tel: [REDACTED]

[REDACTED]
Normal working days Mon, Tues.

Here are my comments:

SM9914 5670 & SM9914 4373

The evidence of semi- natural sward *J effusus*, *Holcus* and *R repens*, these can occur quite happily in an improved sward, not indicators of semi- natural, Angelica is.

Agronomist needs to be contacted by you or the client (preferably you) and see whether they can clarify their comments and state that the field were out of the Regs or not. Need a response in writing. If they say it was improved, then it was improved, no argument, we cant be seen to be calling them a liar.

When you mapped it before did you explain on your classification of Marshy grassland? The fact they had been ploughed 12 years ago is relevant.

If the evidence does seem to show semi- natural, you need to state that in the referral.

Seem is not a very strong word, and from the evidence you have given it's a but tenuous as to whether the field was on was not in the Regs before the works of the current landowner.

What do the consultations say? Need to speak to agronomist. Need to be clear in the referral that whilst things are pointing toward the semi- natural before the works it is not definite.

Your historic knowledge of the site is not relevant anymore if there was a ploughing incident between then and now.

Thanks

■

Morning [REDACTED]

If you have the evidence that parcels SM9914 5670 & SM9914 4373 were SN then refer to RIW. Discuss the extent with [REDACTED] first.

[REDACTED]