

INTERNAL MEMORANDUM

To	Gareth Davies
From	Matt Davies
Memo #	1
Date	02/07/2026
Previous memo date	-
Application:	P/26/0136 Dormer bungalow Builders Yard Elwyn Drive Twynyrodyn Merthyr Tydfil CF47 0NS

SITE DESCRIPTION

A collection of buildings within a former builders' yard close to "stepping stone" links (garden habitat, trees grassland) to the wider environment (parkland, woodland, scrub, grassland etc).

PROPOSED WORKS AND POTENTIAL IMPACTS

Proposed works	Works likely to impact protected species (if present)
Demolition of builders' offices and stores and construction of a Dormer Bungalow	Yes - roosting bats, nesting birds, invertebrate species

DESIGNATED SITES WITHIN 500M OF THE APPLICATION SITE

✓ Buglife B-Lines Area	1x (c.375m)
------------------------	-------------

PRIORITY AND PROTECTED SPECIES WITHIN 500M OF THE APPLICATION SITE

<i>Species / Species Group</i>	<i>Closest record(s)</i>
✓ Birds (including Schedule 1 ¹ and Section 7 ² species);	swift (c.192m)
✓ Invertebrates (including Section 7 ² species)	Small heath (c.410m)
✓ Mammals	
✓ Bats (European protected species ³ + some Section 7 ² species);	Common pipistrelle (c.312m) – commuting Soprano pipistrelle (c.535m) – roost record
✓ Otter (European protected species ³ + Section 7 ² species);	(c.694m)
✓ Hedgehog (Section 7 ² species);	(c.121m)
✓ Amphibians	
✓ Great crested newt (European protected species ³ + Section 7 species);	(c.944m)
✓ Vascular plants (including Section 7 ² species).	bluebell (c.457m)

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

³ Conservation of Habitats and Species Regulations 2017 (as amended)

DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1	Green Infrastructure Statement [GIS] <i>prepared by</i> D Vivian Jones, Building Design Services. Dated: April 2026.
---	--

REQUIREMENTS AND COMMENTS

Holding objection?	YES	The survey work as detailed below is a requirement. Protected Species are a material consideration for planning applications.
Survey work?	YES	A Preliminary Ecological Appraisal (PEA) of the site to include a Preliminary Roost Assessment (PRA) for bats and nesting birds (undertaken by a suitably qualified and experienced ecologist) is required. This must provide sufficient information for the local planning authority to assess any potential adverse impacts of the proposed development on priority and protected species and/or habitats, or to identify what further information is required before a full assessment is possible. The results of the PEA and PRA will be used to inform whether further surveys are required, or to establish the need for and extent of any mitigation and compensation measures required as part of the proposed development. An Aderyn data search is required from SEWBrEC (Package B 1km).
Enhancement	YES	There will need to be enhancement of the site in line with the Environment (Wales) Act 2016.
Planning Policy Wales 12 (Chapter 6)	YES	The main elements of the policy (that are or may be relevant to this application) are as follows: ○ <i>GREEN INFRASTRUCTURE: stronger emphasis on taking a proactive approach to green infrastructure, the submission of a proportionate green infrastructure statement [GIS] with planning applications and signposting Building with Nature standards.</i> ○ <i>NET BENEFIT FOR BIODIVERSITY AND THE STEP-WISE APPROACH: further clarity is provided on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and, the need to consider enhancement and long-term management at each step. The use of the green infrastructure statement as a means of demonstrating the stepwise approach is made explicit. A simplified diagram of the policy approach has been developed (included within PPW12). The importance of strategic collaboration to identify and capture larger scale opportunities for securing a net benefit for biodiversity is recognised.</i> ○ <i>PROTECTION FOR SITES OF SPECIAL SCIENTIFIC INTEREST: strengthened approach to the protection of SSSIs, with increased clarity on the position for site management and exemptions for minor development necessary to maintain a ‘living landscape’. Other development is considered unacceptable as a matter of principle. Exceptionally, a planned approach may be appropriate where necessary safeguards can be secured through a development plan</i>

		○ <i>TREES AND WOODLANDS: closer alignment with the stepwise approach, along with promoting new planting as part of development based on securing the right tree in the right place.</i> For further information, see here - Planning Policy Wales - Edition 12 (gov.wales)
Document 1 (GIS)		Document 1 contains insufficient detail and would need to be rewritten following the results of required ecological survey work as detailed above. The GIS should contain the following information: • A description of how green infrastructure has been incorporated into planning proposals; • A demonstration of how the step-wise approach (the means of demonstrating the steps taken towards securing a Net Benefit for Biodiversity, NBB) has been applied; • The highlighting and description of up-to date baseline data considered and up-to-date surveys and assessments undertaken, sustainable drainage statements, landscape and ecological management plans etc. • Consideration of ecosystem resilience by using the DECCA (Diversity, Extent, Condition, Connectivity, Adaptability) framework. To demonstrate NBB, the GIS must be accompanied by a Long-term Landscaping, Habitat and Ecology Scheme (LHES), which should include, but not be limited to: • Details (including a plan/drawing) of both the retained and new landscaping/habitat/green infrastructure. • A planting plan - NB all species will be native and of local (if not Welsh) provenance. • Long term⁴ establishment, maintenance and management measures for all onsite landscaping/habitat/green infrastructure (both retained and new). • Details of other ecological measures, e.g., bat boxes, bird boxes, hibernacula, gaps in boundaries for hedgehogs etc. • Monitoring post-development for all onsite landscaping/habitat/green infrastructure and other ecological measures. • Details of how a net benefit for biodiversity will be achieved within as short a time as possible and be locally responsive and relevant to local circumstances. • Details of the funding mechanisms to meet the maintenance, management and monitoring objectives including details of the responsible person or company. NB the funding mechanism must anticipate and take account of costs rising over time.

⁴ for the lifetime of the development or at least 25 years