

INTERNAL MEMORANDUM

To: Rebecca Owens
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 1
Date of previous memo: -
Date: 28/11/2025

SUBJECT: P/25/0322 | Erection of stables, horse walker, horse manege, car park and associated works | Land At Tir Cook Farm Twynygarreg Treharris CF46 5RN

The works included within this application were initially unauthorised works, which have resulted, effectively, in pre-emptive clearance of certain areas of the site.

Planning Policy Wales 12 (page 151) states the following:

“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 [NBB] 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.”

SITE DESCRIPTION

Stables, horse walker, horse manege, car park within a farm setting. Most elements already built. The site is close to valuable habitat (woodland, hedgerows, agricultural fields).

ECOLOGICAL DOCUMENTS SUBMITTED TO SUPPORT THE ABOVE [retrospective] APPLICATION

1. Tir Cook Farm, Treharris Mountain Road, Treharris, Merthyr Tydfil, CF46 5RN. A Green Infrastructure Statement *prepared by* Little Wing Ecology CYF *on behalf of* Utopia Design Architectural Services. Report reference: LT324-GIS-25. Version 1. Dated: 31/10/2025.

COMMENTS

Baseline for a Net Benefit for Biodiversity

- Document 1 uses a post-clearance (see initial comments above) baseline from which to produce a Net Biodiversity Benefit (NBB). However, planning policy states that where a site has been cleared prior to development its biodiversity baseline should be deemed to have been as it was before any clearance took place. NBB must be achieved from that point. Habitat status can be established through evidence remaining on site and local desk-based assessments. In such cases, habitat status will be presumed to be good in the absence of any evidence to the contrary.

The document must therefore be re-written on this basis. The updated document will then be evaluated.

Artificial Light At Night (ALAN)

- The site is in a relatively unlit area. ALAN has impacts on nocturnal and crepuscular species, biodiversity and the functioning of whole ecosystems. ALAN is not a requirement for use of the manege. For these reasons onsite lighting will not be acceptable. This is in line with good lighting principles as set out in Welsh Government guidance (Good Practice Guidance: Planning for the Conservation and Enhancement of Dark Skies in Wales - <https://www.gov.wales/sites/default/files/publications/2025-02/dark-skies-guidance.pdf>) – “Don’t light unless it’s necessary. Is the light really needed to fulfil a clear task or function?”