

INTERNAL MEMORANDUM

To: Mel Ferreira
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 2
Date of previous memo: 12/06/2025
Date: 26/09/2025

SUBJECT: P/25/0167 | Detached two storey dwelling | Land At Six Bells Estate Heolgerrig

SITE DESCRIPTION

Area of partially regenerated scrub. Nearby habitat includes gardens, areas of grassland, heathland, woodland and streams. There appears, over the years, to have been clearance of the site, which once was covered with trees/scrub.

PROPOSED WORKS AND POTENTIAL IMPACTS

See table below.

Proposed works	Works likely to impact protected species (if present)
Removal of onsite habitat to facilitate residential development	Yes, for example, nesting birds, invertebrates

PLANNING POLICY

Planning Policy Wales 12 (PPW 12), page 151, 6.4.16 states:

“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 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.”

PPW 12, page 159, 6.4.42 states:

“Replacement [tree] planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost.”

DESIGNATED SITES WITHIN 500M OF THE APPLICATION SITE

- ✓ Site of Special Scientific Interest (SSSI): x1, Cwm Glo a Glyndyrys, c.202m from site
- ✓ Sites of Importance for Nature Conservation (SINC): x1, Cwm Glo, c.149m from site
- ✓ Ancient Semi Natural Woodland (ASNW):
- ✓ Within a Buglife B-Lines Area

PRIORITY AND PROTECTED SPECIES WITHIN 500M OF THE APPLICATION SITE

- ✓ Birds (including Schedule 1¹ and Section 7² species);
- ✓ Fungi + Slime Moulds (including Section 7² species);
- ✓ Invertebrates (including Section 7² species)

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

- ✓ Marsh fritillary butterfly (Section 7² species), closest record c.414m from site;
- ✓ Mammals
 - ✓ Bats (European protected species³; some Section 7² species) - closest roost record for common pipistrelle, c.651m from site);
 - ✓ Otter (European protected species³; Section 7² species);
 - ✓ Hedgehog (Section 7² species);
 - ✓ Harvest mouse (Section 7² species);
 - ✓ Badger;
 - ✓ Water vole
- ✓ Reptiles (Section 7² species);
- ✓ Amphibians
 - ✓ Great crested newt (European protected species³; Section 7 species) - closest record c.647m from site);
- ✓ Vascular plants (including Section 7² species).

DOCUMENTS RELATED TO ECOLOGY SUBMITTED IN SUPPORT OF P/25/0167

1. Land at Six Bells Estate, Heolgerrig, Merthyr Tydfil. Green Infrastructure Statement 2025 *prepared by* East Ecology *on behalf of* Mr Nicholas Simon Meaney. **Dated: 24/09/2025.**
2. Land near Six Bells, Heolgerrig, Merthyr Tydfil. New Dwelling. Side Elevations & Site Plan drawing *prepared by* Indigo 3d Design. Drawing Number: SB-04. Rev No: B. Dated: 14/07/2025.
3. Land near Six Bells, Heolgerrig, Merthyr Tydfil. New Dwelling. Site Plan B *prepared by* Indigo 3d Design. Drawing Number: SB-06. Rev No: A. Dated: 04/04/2025.
4. Six Bells Estate, Merthyr Tydfil, CF48 1TU. Survey of Land designates CYM221750 (title number). Letter-style report *prepared by* Clearsafes Knotweed *on behalf of* Mr Nicholas Simon Meaney. Dated 13/05/2025.
5. Land at Six Bells Estate, Heolgerrig, Merthyr Tydfil. Preliminary Ecological Appraisal 2025 *prepared by* East Ecology *on behalf of* Mr Nicholas Simon Meaney. **V1.3 Dated: 24/09/2025.**

COMMENTS - Document 1

- A further review of the Historical StreetView imagery – specifically from May 2018 (when it is understood the site was already in the ownership of the current applicant) – shows the site to have x4 trees and to be mostly covered in habitat, with grassland, and scrub in evidence. See below:



- The site was cleared of vegetation sometime between May 2018 and October 2021. The planning department consider this to constitute pre-emptive clearance.
- As the site has been pre-emptively cleared, then its biodiversity value should be deemed to have been as it was before any clearance took place. i.e., in May 2018 – see above. A Net Benefit for Biodiversity must be achieved from this baseline. There will also need to be a reassessment of the number of trees required to appropriately compensate for those lost - 12 would be needed to achieve a 3:1 compensation.

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

- The previous versions of the GIS document (dated 14/05/2025 and 18/07/2025) both state that the '*mature, but deformed spruce tree*' is '*growing on made ground*' and '*will become unstable when loose material is removed to create a new retaining wall.*' and therefore '*cannot be retained*'. The updated version of the GIS (dated 24/09/2025) now simply states that the tree will be retaining in position. How will this be achieved, given the previous assessment?
- The Sketch plan (GIS 14/05/2025) referred to 'EL1 flowering lawn'. The reference to EL1 has now been completely removed. Is this no longer proposed?
- The GIS (01/09/2025) included a list of species proposed to be planted within the vertical geocell areas along the northern and western boundaries. The list includes x7 native woody species (for example as defined by the 1997 Hedgerow Regulations). The references to the vertical geocell have now all been removed from the updated GIS (24/09/2025), other than in the sketch plan, where they are labelled as '*Removed Geocell – not required*'. This includes the formerly proposed geocell along both the northern *and* western boundaries. Presumably this is in response to the northern boundary hedgerow being re-assessed as being outside of the ownership of the site. Is the geocell along the western boundary to remain? How will the northern boundary now be defined, e.g., fence ... wall? NB Under section 7 – Biodiversity enhancements, there is still reference to the vertical geocell.
- As referred to above, the biodiversity baseline is deemed to have been that present in May 2018. Therefore, the GIS as proposed in Document 1 is inadequate as it will not achieve a Net Benefit for Biodiversity. An updated proposal is required.
- A proportionate long-term (in perpetuity or for at least 25yrs) Landscaping Management Plan for all proposed onsite habitats will be required.
- Section 7. Biodiversity enhancements – within the text box shows an integrated bat box and a build-in swift box. The sentence above the box however states '*These enhancements do not need to be directly attached to the proposed new construction; they can be attached to the host dwelling or placed within the garden, but they do need to be on land within the red or blue line.*' The boxes must be integrated and therefore this sentence (shown in *italics*) should be deleted to remove any ambiguity.
- All enhancement features must be clearly shown on all appropriate architectural plans, drawings and elevations.

Document 2

- This document shows the bat and bird boxes, all on the eastern elevation. There is only a single bird box labelled, and the label shows references to surface mounted models. Document 1 specifies x2 swift boxes integrated at a height of at least 5m. Changes are therefore required.
- The information in Document 1 must be consistent with the information in Document 2.
- It is suggested that the boxes are not erected directly above windows where possible.

Document 3

- As per Document 1, this drawing also refers to EL1 flowering lawn.
- The information in Document 1 must be consistent with the information in Document 3.

Document 4

- As specified within Document 4, a Japanese Knotweed Management Plan must be commissioned and submitted to the LPA for approval.