

INTERNAL MEMORANDUM

To	Rebecca Owens
From	Matt Davies
Memo #	1
Date	19/06/2026
Previous memo date	-
Application:	P/26/0118 Change of use of ground floor from A2 use to residential use (A3 use) comprising 2 no. apartments 19 & 20 Church Street Merthyr Tydfil CF47 0AY

DESIGNATED SITES WITHIN 500M OF THE APPLICATION SITE

✓ Sites of Importance for Nature Conservation (SINC)	x1 Afon Taf (c.331m)
✓ Within a Buglife B-Lines Area	x1 (c.80m)

PRIORITY AND PROTECTED SPECIES WITHIN 500M OF THE APPLICATION SITE

✓ Birds (including Schedule 1 ¹ and Section 7 ² species);	Closest record for Cuckoo (c.78m)
✓ Fish (including Section 7 ² species);	Closest record for Brown/Sea Trout (c.466m)
✓ Invertebrates (including Section 7 ² species)	Closest record for Violet Oil-Beetle (c.172m)
✓ Marsh Fritillary Butterfly (Section 7 ² species);	Closest record (c.1258m)
✓ Mammals	
✓ Bats (European protected species ³ + some Section 7 ² species);	Closest roost record for Soprano pipistrelle, c.80m from site)
✓ Otter (European protected species ³ + Section 7 ² species);	Closest record (c.505m)
✓ Hedgehog (Section 7 ² species);	Closest record (c.368m)
✓ Amphibians	
✓ Great crested newt (European protected species ³ + Section 7 species);	Closest record (c.610m)

DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1	Green Infrastructure and Biodiversity Statement. Received: 03/06/2026.
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REQUIREMENTS AND COMMENTS

Survey work?	NO	No ecological survey work required, however, there will need to be enhancement in line with the Environment (Wales) Act 2016 and Welsh Government Circular 'Securing Biodiversity Enhancements' sent to Heads of planning in October 2019.
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¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

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

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> For further information, see here - Planning Policy Wales - Edition 12 (gov.wales)
Comments		Document 1 does not include a version number, date or details of authorship. This is required. The document is not a GIS but is acceptable as a biodiversity enhancement plan and should be re-named. The 2x bird boxes are proposed for the northern elevation, which is the only suitable elevation available. The type/model of bird box must be specified (suggestion: 1x use a sparrow terrace, constructed from woodcrete or woodstone, for example - https://www.nhbs.com/1sp-schwegler-sparrow-terrace, or equivalent). This box must be clearly marked on relevant architect drawings, plans and/or elevations. There is some scope for low level green infrastructure provision within the small garden of the building. Suggestion – a planter sown filled with low fertility soil and sown with native species wildflower seed (seed mix suggestion and management plan included below for submission). The planter also must be clearly marked on relevant architect drawings, plans and/or elevations.

Suggested seed mix

<https://wildseed.co.uk/product/mixtures/wild-flower-only-mixtures/basic-general-purpose-wild-flowers/> (or equivalent)

Management plan

Grassland and Wildflower Areas

Establishment Phase (Years 0–2)

1. Seed Selection

- *Use only native species seeds of local (if not Welsh provenance) will be used to maintain regional genetic diversity and support native wildlife.*

2. Ground Preparation

- *Ground with low fertility and without perennial weeds will be used.*
- *Any weeds that are present will be removed from the area using repeated cultivation.*
- *The surface vegetation will be buried and the soil raked and then rolled or treaded to produce a firm surface.*

3. Sowing

- *Seed will be sown by hand in autumn or spring.*
- *The seed quantity will be split into two or more parts to avoid running out and ensure an even distribution.*
- *The seed will be rolled or treaded in to give good soil to seed contact.*

4. First Year Management

- *After sowing there will be a flush of annual weeds arising from the soil seed bank. This may look unsightly but will provide shelter for the sown seedlings and a resource for invertebrates. The weeds will be cut, removed and composted in early August.*
- *The young wildflower area will then be kept short by mowing until March of the following year.*
- *Any remaining perennial weeds such as docks will be dug out.*

5. Management once established (2-25 years)

- *In the second and subsequent years the area will be managed using traditional meadow management methods.*
- *The wildflower area will not be cut from spring through to early August to give the sown species an opportunity to flower and go to seed.*
- *In early August the area will be cut to a height of approximately 50mm and the cuttings left to dry and shed seed for up to a week. The cuttings will then be removed from the site to prevent nutrient build-up.*
- *The re-growth can then be mowed before winter (optional) to a height of approximately 50mm and again in spring if needed (again, optional). Cuttings will be removed to prevent nutrient build up.*
- *Introduce Yellow Rattle in the Autumn to reduce grass dominance and promote wildflower diversity.*
- *Rotate some uncut areas to create structural diversity.*

6. Monitoring

- *Track species emergence and adjust management accordingly.*
- *Introduce additional species via, for example, plug planting if needed.*