

INTERNAL MEMORANDUM

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

Memo number: 2
Date of previous memo: 22/11/2024
Date: 16/07/2025

SUBJECT: P/24/0130 | Proposed External Cladding and alterations to windows | Ty Bryn Seion North Street Dowlais Merthyr Tydfil CF48 3SR

ECOLOGICAL REPORTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1. Ty Brynseion, Dowlais, Merthyr Tydfil. Preliminary Roost Assessment *prepared by Acer Ecology*. Revision 1.0. Dated 20/11/2024.
2. Ty Brynseion, Dowlais, Merthyr Tydfil. Bat and Nesting Bird Survey Report *prepared by Acer Ecology*. Revision 2.0. Dated 10/07/2025.

COMMENTS

- The building has suitability for hibernating bats. Therefore, any reference to undertaking works during the hibernation period must be removed from Document 2.
- As the fascias/bargeboards/soffits are all to be removed, their replacements should *all* have the 20mm gap rather than limiting this to x4 discrete areas. Please amend Document 2 and all relevant architect plans, drawings and elevations. Additionally, the gap under the bargeboard should also allow bat access to the cavity and provide hibernation opportunities in compensation for those opportunities lost due to the installation of the external cladding. This must be made clear within Document 2.
- Details of the post-development monitoring will also be reported to the LPA ecologist. Again, please add this to Document 2.
- Planning Policy Wales (PPW 12), Chapter 6 must be considered where relevant to this application.

The main elements of the policy (that are or may be relevant to this application) are as follows:

- *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.*
- *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.*
- *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

- *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.*

For further information, see here - [Planning Policy Wales - Edition 12 \(gov.wales\)](https://gov.wales/planning-policy)

A detailed GIS and a detailed, long-term, landscape/habitat establishment, maintenance, management and monitoring plan will therefore be required.

- An internal and external Lighting Scheme must be submitted to and approved in writing by the local planning authority. The Lighting Scheme must demonstrate dark zones at the boundaries and across/through the site. Known roosts, wildlife boxes and fascia boards, bargeboards, soffit boxes must not be illuminated and there must be dark routes to allow barrier-free access to these areas and links to suitable commuting and foraging habitat. The Lighting Scheme must conform to the latest guidance documents (see below) and any updates to these documents or further guidance regarding lighting that may be published subsequently.
 - Guidance Note GN08/23 Bats and Artificial Lighting At Night. Bat Conservation Trust and The Institute of Lighting Professionals 2023 - <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>
 - Good Practice Guidance: Planning for the Conservation and Enhancement of Darks Skies in Wales. <https://www.gov.wales/sites/default/files/publications/2025-02/dark-skies-guidance.pdf>
- The following informatives will be added to the decision notice should planning permission be granted:
 - ***Warning: A European Protected Species (EPS) Licence is required for this development.***

This planning permission does not provide consent to undertake works that require an EPS licence. It is an offence to deliberately kill, injure, capture or disturb a bat or to recklessly damage or destroy their breeding sites or resting places. If found guilty of any offences, you could be sent to prison for up to 6 months and/or receive an unlimited fine. To undertake works within the law, you can obtain further information on the need for a licence from Natural Resources Wales on 0300 065 3000 or at <https://naturalresources.wales/permits-and-permissions/species-licensing/apply-for-a-protected-species-licence/bat-licences/?lang=en>
 - ***All birds, their nests and eggs are protected by law under the Wildlife and Countryside Act 1981 (as amended) while they are breeding.***

If works to any trees, hedgerows and/or other nesting bird habitat (including buildings/structures with suitable features) are to be undertaken, they will take place outside of the bird nesting season. If the works must be undertaken during the nesting season (generally from 1st March until 31st August, although birds are known to nest outside of these dates in suitable conditions), a breeding bird survey will be required and must be carried out by a suitably qualified ecologist. Any active nests identified will be protected until the young have fledged.

Where a Schedule 1 species (as defined in the Wildlife and Countryside Act - <https://www.legislation.gov.uk/ukpga/1981/69/schedule/1> is involved, compensation for impacts, e.g., loss of nesting sites, will be devised and implemented.