

# INTERNAL MEMORANDUM

To: Kate Glover  
From: Matt Davies (Ecologist)  
Ext: 5278

Memo number: 2  
Date of previous memo: 02/09/2024  
Date: 24/09/2024

**SUBJECT: P/24/0199 | Proposed change of use from community hall (D2 Use Class) to a residential bungalow | Former Bontnewydd Hall Bontnewydd Terrace Trelewis CF46 6AB**

## SITE DESCRIPTION

Disused community hall adjacent to well-connected woodland habitat.

## DOCUMENTS SUBMITTED related to ecology

1. Bontnewydd Hall, Bontnewydd Terrace, Trelewis, CF46 6AF. Bat Survey report prepared by Ecological Services Ltd on behalf of Merthyr Valley Homes. **Version V2.0. Date: September 2024.**
2. Bontnewydd Terrace, Trelewis. Proposed Elevations. Darwing No: LT2204.04.04, prepared by LeTrucco Design Architecture. Date: March 24. **REV B [ECOLOGY – BAT AND BIRD BOXES UPDATED].**

## COMMENTS

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### Habitat

Question (from memo #1: will any trees or other habitat be impacted by the proposed scheme?

The answer to this question is still required. Document 1 states that the report is “*solely concerned with bats in relation to these buildings.*” And that “*Trees and other buildings not mentioned directly have not been included in this report.*”

The ecologists’ remit is specific. The applicant must make it clear whether any trees or other habitat will be impacted by the proposed scheme. This will have relevance in relation to the Green Infrastructure Statement – see PPW12 comments below.

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### Lighting

An internal and external lighting plan/scheme is required, which must conform to <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>.

The lighting plan/scheme would be submitted prior to development, but could also be secured via an appropriately-worded planning condition.

Suggested wording of planning condition.

*“No development shall take place (including ground works, vegetation clearance) until an internal and external Lighting Scheme has been submitted to and approved in writing by the local planning authority. The Lighting Scheme will be required to minimise any external light disturbance to the bats using the building and surrounding area. Any new external lighting must not directly illuminate any roosting location (existing/retained/new). The Lighting Scheme must conform to the latest guidance for wildlife-friendly lighting.”*

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### Planning Policy Wales 12 (PPW12)

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 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 (which will be further refined in the consolidated version of 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 regarding PPW12, see here - [Planning Policy Wales - Edition 12 \(gov.wales\)](https://gov.wales/planning-policy-wales-edition-12)