

INTERNAL MEMORANDUM

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

Memo number: 3
Date of previous memo: 16/07/2025
Date: 18/08/2025

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 3.0. Dated 30/07/2025.
3. Ty Brynseion Lower Ground Floor. Proposed Lighting Layout. Drawing No: 558330-00 prepared by Thorlux Lighting. Dated 06/09/2022.
4. 1-41 Brynseion, Dowlais, Merthyr Tydfil, CF48 3SR. Drawing: Proposed Layout - 2010Y40R. Drawing number: 24014/02 Rev F, *prepared by AD Architectural Design Consultants Ltd*. Dated: 23/04/2024.
5. A Green Infrastructure Statement to support a Full Planning Application for External Wall Cladding & Window Amendments at Ty Bryn Seion, Dowlais, Merthyr Tydfil, CF48 3SR.

COMMENTS: *Document 2*

6.2.1 Installation of Bat Boxes for Displaced Bats During Works

Question: are these bat boxes proposed to be erected onto trees?

COMMENTS: *Document 3*

There is no detail regarding the colour temperature for most of the luminaires proposed. Those that do specify a colour temperature (RL19069SS - 8w LED Realta SmartScan polycarbonate refractor LED high performance exterior luminaire and WRL19069SS - 8w LED Realta SmartScan polycarbonate refractor LED high performance exterior luminaire) are not acceptable. These both specify a colour temperature of 4000K. All luminaires must have a colour temperature of 2700K or less.

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.

Additionally, there should be sufficient distance (at least c.2m) below known roosts wildlife boxes and fascia boards, bargeboards, soffit boxes to allow bats to drop down from the roost access points when exiting.

Therefore, the Lighting Scheme must include horizontal and vertical illuminance plans. The dark corridors will need to comply with the following guidelines in terms of lux levels:

<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/> (for example, see pages 37-38).

The contours (and/or coloured numbers) for 0.2, 0.5, 1, 5, and 10 lux must be clearly shown, as well as appropriate contours for values above these.

COMMENTS: *Document 4*

Document 4 shows a bat box on the south east elevation as well as a bat hibernation box on the north west elevation. Is this correct?

COMMENTS: *Document 5*

Page 1 refers to "... the Pembrokeshire Local Development Plan ...". Please amend.

Page 2 Enhancements – Bat boxes, Raised Fascias / Bargeboards & Native planting – "*The proposed locations of the above enhancements are indicated on the attached drawing – 25023-02-F – Proposed Layout.*". Is this drawing available?

Page 3 refers to biodiversity net gain, which is the system used in England. In Wales, Net Benefit for Biodiversity is used.

NB there are no details of authorship, no document version number and no date. This information is required. The document misinterprets the concepts dealt with under a GIS. It is therefore recommended that the document is written by a suitably qualified person (e.g., an ecologist or a landscape architect).

PPW 12 states that a GIS should be submitted with all planning applications that:

- will describe how green infrastructure has been incorporated into planning proposals;
- must be used for demonstrating how the step-wise approach has been applied;
- should highlight baseline data considered and surveys and assessments undertaken, sustainable drainage statements, landscape and ecological management plans etc.
- will consider ecosystem resilience by using the DECCA (Diversity, Extent, Condition, Connectivity, Adaptability) framework.

In addition, the policy indicates that the step-wise approach is the means of demonstrating the steps taken towards securing a net benefit for biodiversity. The onus is on developers to bring forward proposals in a way that will achieve a net benefit for biodiversity demonstrating how they have used the step-wise approach.

The GIS as submitted is not acceptable and does not demonstrate that there will be a Net Benefit for Biodiversity,

NB each stage of the step-wise approach must be accompanied by a long-term management plan. The management plan should set out:

- Details of newly proposed landscaping/habitat/green infrastructure;
- A planting plan. NB all species will be native and of local (if not Welsh) provenance;
- The immediate and long term (for a scheme of this scale – in perpetuity or at least 25 years) maintenance and management measures for all onsite landscaping/habitat/green infrastructure (both retained and new).
- Details of any other ecological measures if relevant, e.g., bat boxes, bird boxes, hibernacula, etc;
- Monitoring post-development for all onsite landscaping/habitat/green infrastructure/ and other ecological measures;
- Details of the funding mechanisms to meet the maintenance, management and monitoring objectives plus details of those responsible. NB the funding mechanism must anticipate and take account of costs rising over time;
- How a net benefit for biodiversity will be achieved within as short a time as possible and be locally responsive and relevant to local circumstances.

Document 5 does not include most of this information. Page 2 of Document 5 states "the proposal will include the introduction native planting and shrubs within the surrounding garden areas. See below a typical list of native plants which should be included:

Hawthorn 50%
Field Maple 8%
Dogwood 8%
Hazel 6%
Wild Privet 6%
Blackthorn 8%
Viburnum Lantana 7%
Viburnum Opulus 7%”

Much more detail is required, which must be definite, rather than being referred to in the context of plants that ‘*should*’ be included.

Informatives/Advisory notes

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.