

INTERNAL MEMORANDUM

To: Gareth Davies
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 3
Date of previous memo: 11/11/2025
Date: 12/02/2026

SUBJECT: P/25/0230 | Repair and restoration of the Grade II listed Synagogue and Grade II listed Primrose Hill to provide a Welsh Jewish Cultural Centre, with associated landscaping works on land to the north and east of the Synagogue, the erection of a bat roost house, plant enclosure and air source heat pump. | The Synagogue Church Street Merthyr Tydfil CF47 0ER

SITE DESCRIPTION

Currently unoccupied Synagogue building adjacent to high value, well-connected and mature/semi-mature tree and woodland habitat to the north and east. The woodland habitat is likely to have been present for >70 years – according to historic imagery.

ECOLOGY DOCUMENTS + REPORTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1. Merthyr Tydfil Synagogue, CF47 0ER. Ecological Impact Assessment Report *prepared by* Wildwood Ecology Ltd. Report reference: WWE23174 EclA **Rev A. Final. Dated: 09/02/2026.**
2. Merthyr Tydfil Synagogue Project. Green Infrastructure Statement. Final. *Prepared by* Bronwen Thomas Landscape Architect on behalf of Foundation for Jewish Heritage. **Dated: August 2025.**
3. Merthyr Tydfil Synagogue Project. Landscape Strategy Statement. Final. *Prepared by* Bronwen Thomas Landscape Architect *on behalf of* Foundation for Jewish Heritage. **Dated: August 2025.**
4. Merthyr Tydfil Synagogue Project. Landscape Assessment, Constraints & Opportunities drawing. Drawing number: MTSP-P-005. *Prepared by* Bronwen Thomas Landscape Architect *on behalf of* Foundation for Jewish Heritage. **Dated: 21/02/2025**

COMMENTS – General

NRW have advised the following planning conditions within their comments dated 17/09/2025:

- Bat Conservation Plan
- External Lighting
- Bat Management and Maintenance Plan
- Ecological Compliance Audit

COMMENTS – Document 2 (GIS)

The GIS is acceptable and appropriate with the following caveats:

- Trees – the step-wise approach has been followed up to a point. If the 3:1 replacement/compensation ratio cannot be accommodated onsite than offsite compensation will be required – as per PPW 12.
- Dormice – the step-wise approach table includes measures for bats and birds, however, it must also include common dormice. The information should align with that found in the amended PEA (when provided).
- Considerations for ecosystem resilience by using the DECCA (Diversity, Extent, Condition, Connectivity, Adaptability) framework should be included. NB Wildwood Ecology should be able to assist with this if necessary.

- PPW12 indicates that the stepwise approach is the means of demonstrating the steps taken towards securing a Net Benefit for Biodiversity (NBB).

Page 8 states “*The Synagogue garden aims, amongst other considerations, to enhance the biodiversity of the site and wider connectivity with other habitats. This will be achieved by creating the basis for more varied habitats than the current poor-quality woodland. Therefore, woodland links, varied shrub and herbaceous planting to provide pollen, food and shelter for a wide range of insects are being proposed.*” and

“The following ‘Stepwise’ table shows how this overall enhancement for green infrastructure will be achieved, providing a net benefit for biodiversity.”

However, the information within the stepwise approach table does not reflect/flesh out these general comments.

COMMENTS – Documents 3 + 4

Landscape scheme requirements are as follows:

LANDSCAPE & HABITAT MANAGEMENT SCHEME (LHMS)

A detailed long-term LHMS is required. The LHMS must include, but not be limited to, the following:

- Details (including a plan/drawing) of *retained* landscaping/habitat/green infrastructure.
- Details including a plan/drawing) of *new* landscaping/habitat/green infrastructure.

NB 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. Where a woodland or a shelterbelt area is lost as part of a proposed scheme, the compensation planting must be at a scale, design and species mix reflective of that area lost. In such circumstances, the planting rate must be at a minimum of 1600 trees per hectare for broadleaves, and 2500 trees per hectare for conifers. Further details to be found in PPW12¹.

NB replacement tree planting must be in the right place and not at the expense of other valuable and/or priority and protected habitats.

- A planting plan - NB all species will be native and of local (if not Welsh) provenance.
- The immediate and long term (*in perpetuity*) establishment, maintenance and management measures for all onsite landscaping/habitat/green infrastructure (both retained and new).
- Timing, phasing and duration of construction activities.
- Monitoring post-development for all onsite landscaping/habitat/green infrastructure.
- 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.

It seems reasonable that the information as referred to above (specifically, “*timing, phasing and duration of construction activities*” and “*details of the funding mechanisms*” cannot be provided at present. However, there should be no restrictions regarding the other information (not currently included in the Landscape Strategy Statement and the Landscape Assessment, Constraints & Opportunities drawing) :

- Offsite tree replacement/compensation to achieve a 3:1 ratio.
- A planting plan - NB all species will be native and of local (if not Welsh) provenance.
- The immediate and long term (*for the lifetime of the development*) establishment, maintenance, and management measures for all onsite landscaping/habitat/green infrastructure (both retained and new).

¹ [Planning Policy Wales - Edition 12](#)

- Full details of monitoring post-development for all onsite landscaping/habitat/green infrastructure.
- 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.

COMMENTS – *General point re the GIS and Landscape and Habitat Management Scheme (LHMS)*

Since PPW12, Chapter 6 came into force the following principle regarding the GIS and long-term landscaping plan requirement has been advised:

- For a FULL application
 - detailed GIS, informed by a detailed long-term landscaping plan, both required prior to determination.
- For an OUTLINE application:
 - outline GIS setting out broad principles, with the following further information secured by planning condition - detailed GIS, informed by a detailed long-term landscaping plan provided at the reserved matters stage

This has been the consistent position and advice since PPW12 was published; however, it is recognised that it has not always been expedient for the planners to also follow this principle. This is a decision for the planners, balancing up all information and consultation advice received. So, there have been occasions where planners have, for example, conditioned a long-term management plan

OTHER REQUIREMENTS

ECOLOGICAL ENHANCEMENT SCHEME

Full details of biodiversity/ecological enhancements are required. All measures must be marked on relevant architect drawings, plans and elevations. The development shall then be carried out in accordance with the approved details and maintained as such in perpetuity.

This can be secured via an appropriately worded pre-commencement planning condition.

LIGHTING SCHEME

An internal *and* external Lighting Scheme is required. The lighting plan must demonstrate dark zones at the boundaries and across the site. Wildlife boxes must not be illuminated (bat, bird) and there must be dark routes to allow barrier-free access to the boxes. Details of lighting to be used both during construction and operation are required. The Lighting Scheme must conform to the latest guidance:

- 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 Dark Skies in Wales. <https://www.gov.wales/sites/default/files/publications/2025-02/dark-skies-guidance.pdf>

The lighting shall be installed and retained as approved during construction and operation.

This can be secured via an appropriately worded pre-commencement planning condition. NB a lighting condition will need to be discharged before the bat derogation licence from NRW can be applied for.

CEMP-B

A Construction Environmental Management Plan - Biodiversity (CEMP-B) is required. The CEMP-B will include, but not be limited to the following:

- A risk assessment of potentially damaging construction-type activities
- Identification of “biodiversity protection zones” and areas where invasive species have been identified.
- Reference to details for implementation of method statements required to achieve specific biodiversity outcomes, and particularly mitigation measures. For example, the LHS and PWMS.

- Identification of practical measures, both physical measures and sensitive working practices to avoid impacts during development, for protecting biodiversity through the control or regulation of construction-type activities.
- The location and timing of sensitive works to avoid harm to biodiversity features.
- The times during construction or development implementation when particular specialists need to be present on site to oversee works.
- Responsible persons and lines of communication.
- Defining and communicating the role and responsibilities on site of an ecological clerk of works (ECoW), or appointed ecologist(s) responsible for managing biodiversity issues on site, and times and activities during construction or development implementation when they need to be present to oversee works.
- Use of exclusion fences, protective barriers and warning signs.

This can be secured via an appropriately worded pre-commencement planning condition.

COMPLIANCE

Evidence that ecological measures have been installed, created, implemented etc will be required on completion of the development. This evidence must be submitted to and approved in writing by the local planning authority.

This can be secured via an appropriately worded pre-commencement planning condition.

INFORMATIVES / ADVISORY NOTES

The following informatives / advisory notes will be added to the decision notice:

BATS

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>

COMMON DORMOUSE

Warning: this planning permission does not provide consent to undertake works that require a European Protected Species (EPS) licence.

Common dormice and their resting places are protected under UK and European legislation. It is an offence to deliberately kill, injure, capture or disturb common dormice or to recklessly damage or destroy their breeding sites or resting places.

If works are planned on a site where common dormice have been identified, Natural Resources Wales (NRW) must be contacted. on 0300 065 3000 or at <https://naturalresources.wales/permits-and-permissions/species-licensing/list-of-protected-species/great-crested-newt-licensing/?lang=en>.

If work has already commenced and common dormice are found, or if any evidence that common dormice are using the site, work should cease and NRW should be contacted immediately.

Under these circumstances, an EPS licence is likely to be required to undertake the works within the law.

NESTING BIRDS

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.