

Ein cyf/Our ref: CAS-287280-B7W0  
Eich cyf/Your ref: P/25/0230

Merthyr Tydfil County Borough Council  
Unit 5 Triangle Business Park  
Pentrebach  
CF48 4TQ

Dyddiad/Date: 17 September 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: 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.**

**LLEOLIAD/LOCATION: THE SYNAGOGUE, CHURCH STREET, MERTHYR TYDFIL.**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 28 August 2025.

**We have concerns with the application as submitted and advise that based on the information submitted to date, conditions regarding protected species should be attached to any planning permission granted AND the document identified below should be included in the approved plans and documents condition on the decision notice. Without the inclusion of these conditions and document we would object to this planning application.**

- Reference: Lewis, B. (2025). Ecological Impact Assessment Report Merthyr Tydfil Synagogue, Cf47 0er. Wildwood Ecology. (Unpublished Report No WWE23174 EcIA)

## **Protected Species**

### Bats

We note that the ecology report has identified that the application site supports the following species of bat:

- (i) Common pipistrelle;
- (ii) Soprano pipistrelle;
- (iii) Brown long-eared (maternity roost)
- (iv) Serotine

(v) Lesser horseshoe (night roost)

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats are present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three tests set out in the Regulations (Please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to “demonstration of no detriment to the maintenance of the favourable conservation status of European protected species”.

We consider that the above report provides an adequate basis upon which to consider the potential impacts of the scheme on these species and inform the decision-making process.

We consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range provided (i) the measures set out in the submitted report are appropriately implemented and (ii) any subsequent consent is subject to the imposition of the following conservation plan condition:

Therefore, we advise that the following document is included the approved list of plans / documents within the decision notice:

- Lewis, B. (2025). Ecological Impact Assessment Report Merthyr Tydfil Synagogue, Cf47 0er. Wildwood Ecology. (Unpublished Report No WWE23174 EcIA)

We also advise the following conditions are included on any permission your authority is minded to grant:

Condition: Bat Conservation Plan

No development including site clearance, shall commence until a Bat Conservation Plan has been submitted to and approved in writing by the Local Planning Authority. The Conservation Plan should build upon the principles outlined in the bat report ( Lewis, B. (2025). Ecological Impact Assessment Report Merthyr Tydfil Synagogue, Cf47 0er. Wildwood Ecology. (Unpublished Report No WWE23174 EcIA)) and shall include, but not necessarily be limited to:

- Details of timing, phasing and duration of construction activities and conservation measures;
- A timetable for implementation of conservation works demonstrating how works are aligned to the construction and phasing of the development;
- Persons responsible for implementing the works;
- Principles of a lighting scheme to avoid lighting bat access points and flight lines
- Proposals to evidence that implementation complies with provisions of the bat conservation plan (see ecological compliance audit below)
- External lighting (see below)
- Management and maintenance plan (see below)
- Post-construction monitoring and record dissemination for a period of no less than 10 years
- Information on how long term maintenance and management will be delivered

The Conservation Plan shall be carried out in accordance with the approved details.

Justification: To ensure that bats are protected by the development

Condition: External Lighting

Prior to commencement of development, full details of lighting shall be submitted to and agreed in writing by the Local Planning Authority. This scheme shall consider existing and proposed lighting together with any spillage originating from internal locations. Details shall include:

- An assessment of lighting in respect of wildlife interests of the site, notably bats
- Details of the siting and type of external lighting and internal light spillage during and post development. This shall include plans illustrating the location and type of lighting together with isolux drawings
- Details to demonstrate that light spillage will not affect wildlife sensitive areas. This shall include plans illustrating projected or retained bat emergence points; together with retained or proposed features planned to be functionally used by bats for foraging/dispersal purposes
- Measures to monitor light spillage once development is operational (post construction light monitoring)
- Ecological compliance audit external lighting key performance indicators.
- Provisions of the scheme shall accord with the provisions of the Institution of Lighting Professionals and Bat Conservation Trust: [Guidance Note 08/23: Bats and Artificial Lighting at Night.](#)

Lighting shall accord entirely with the details so approved for the duration of the operation of the development.

Justification: To protect the wildlife and the ecological interests of the site including protected species

Condition: Bat Management and Maintenance Plan

Prior to development a long-term site management and maintenance plan (not less than 10 years) shall be submitted to and approved in writing by the Local Planning Authority. that includes:

- details of habitats and ecological features present or to be created, both in written form and shown on appropriate drawings, including planting plans;
- defined aims and objectives for the bat compensation roost (including defined key performance indicators for long term monitoring of the building and the species);
- details of the desired condition for each habitat and criteria to determine when habitats have achieved this;
- details of short and long-term habitat management prescriptions to both achieve and maintain the desired condition;
- details of monitoring methodologies and record dissemination for a period of not less than 10 years;
- scheduling and timings of monitoring, management and maintenance activities;
- persons or bodies responsible for undertaking management and surveillance together with required skills and competencies;

- licensing requirements;
- details of reporting, review and update of the plan (informed by monitoring) at specific intervals as agreed.

The plan shall be carried out in accordance with the approved details.

Justification: To ensure that bats are protected post development

### Ecological Compliance Audit

We advise that any future consent includes the imposition of a condition that requires the submission and implementation of an approved ecological compliance audit (ECA) scheme to the satisfaction of the LPA.

The purpose of the Ecological Compliance Audit is to evidence compliant implementation of all ecological avoidance, mitigation and compensation works, either proposed or subject to the provisions of reserved matters conditions. The Audit shall identify Key Performance Indicators (KPI's) that are to be used for the purposes of assessing and evidencing compliant implementation of proposals.

### Dormice

We consider the submitted survey and assessment is satisfactory in respect of dormice. The proposal is not likely to be detrimental to the maintenance of the favourable conservation status of the applicable local population of dormice. We concur with the recommendations in respect of this species.

### Licence

We advise that the works are carried out under licence. We refer you to the Chief Planning Officer's letter dated 1 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

Please note, any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

### **Other Matters**

The advice in this letter relates to matters which are included on our [consultation topics list](#). We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

**Kirsty Murphy**

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning  
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: [southeastplanning@cyfoethnaturiolcymru.gov.uk](mailto:southeastplanning@cyfoethnaturiolcymru.gov.uk)

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.