

Ein cyf/Our ref: CAS-295655-R1W4
Eich cyf/Your ref: P/24/0158

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

Dyddiad/Date: 12 January 2026

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Conversion of first and second floors to 12 self contained flats and associated external alterations.

LLEOLIAD/LOCATION: 68 High Street, Merthyr Tydfil, CF47 8AE.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 17 December 2025.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome if the documents identified below are included in the approved plans and documents condition on the decision notice:

- **Acer Ecology Ltd., 68 High Street, Merthyr Tydfil Bat and Nesting Bird Survey Report, Revision 1.0, dated 2 October 2025.**
- **Acer Ecology Ltd., 68 High Street, Merthyr Tydfil Green Infrastructure Statement, Revision 2.0, dated 2 October 2025.**
- **Acer Ecology Ltd., 68 High Street, Merthyr Tydfil Landscape, Habitat and Ecology Scheme Revision 2.0, dated 2 October 2025.**

Please note, without the inclusion of these documents we would object to this planning application. Further details are provided below.

European Protected Species (EPS)

We have reviewed the following information submitted in support of the application:

- Acer Ecology Ltd., 68 High Street, Merthyr Tydfil Bat and Nesting Bird Survey Report, Revision 1.0, dated 2 October 2025.
- Acer Ecology Ltd., 68 High Street, Merthyr Tydfil Green Infrastructure Statement, Revision 2.0, dated 2 October 2025.
- Acer Ecology Ltd., 68 High Street, Merthyr Tydfil Landscape, Habitat and Ecology Scheme Revision 2.0, dated 2 October 2025.

We note that the reports have identified that the application site supports a maternity roost and day roost for soprano pipistrelle bats.

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 this 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 the measures set out in the submitted report are implemented.

Therefore, we advise that the documents identified above are included in the approved list of plans / documents condition within the decision notice.

We also 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.

Flood Risk

We note that the planning application was validated on 12th September 2024. In accordance with [Welsh Government's Written Statement](#) dated 31 March 2025, our advice is based on Technical Advice Note 15 (TAN15), July 2004.

Therefore, please refer to our previous response (ref: CAS-260165-S5F8, dated 26th July 2024) for our comments relating to flood risk.

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,

Eleanor Sullivan

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

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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.