

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1
Date of previous memo: -
Date: 18/06/2024

SUBJECT: P/24/0133 | Extension to existing hotel to provide additional bedrooms, together with alterations to the car park and associated works | Travel Inn Duffryn Road Pentrebach Merthyr Tydfil CF48 4BB

Documents submitted in support of this application:

1. Premier Inn Merthyr Tydfil, Duffryn, Pentrebach, Merthyr Tydfil, CF48 4BB. Preliminary Ecological Appraisal. Arbtech. Version 1. Dated 1st May 2024.
2. Merthyr Tydfil Premier Inn. Green Infrastructure Statement. Walsingham Planning. Dated May 2024.
3. Premier Inn, Duffryn, Pentrebach, Merthyr Tydfil, CF48 4BB. Arboricultural Method Statement. Arbtech. Dated 30 April 2024.

COMMENTS

Document 1

A biodiversity data search has not been undertaken.

Page 11 (of 25): *“There are multiple trees on site. Some which have roosting features for bats to utilise, but only two are due to be removed for the proposed works and therefore were assessed for their suitability.”*

- T1 – Scott’s pine (low suitability feature – limb torsion split, c.3m up from the ground)
- T2 – silver birch (no suitable features)

This information regarding tree removal does not align with the information in Documents 2 and 3 – see comments in sections below.

The onsite Japanese knotweed is referred to in terms of invasive non-native species (INNS), however, both snowberry and cherry laurel [whilst not listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended)] are also non-native invasive species.

Page 10 (of 25) – the quoted (lighting) hyperlink is incorrect.

Page 10 (of 25) – proposed bat boxes will be of an integrated design incorporated into the new extension.

Page 11 (of 25) – proposed bird boxes (sparrow terrace and swift box) will also be of an integrated design incorporated into the new extension.

Document 2

Page 10, 6.3: *“The loss of 4 trees and modified grassland will be mitigated through the introduction of new tree planting within the site and via a landscaping scheme which includes grassland species and native shrub planting. In accordance with PPW the supporting landscaping scheme provides 12 native replacement trees at a 1:3 replacement ratio.”*

This information regarding tree removal does not align with the information in Documents 1 and 3 – see comments in sections below and above.

Page 5, 4.3 and 4.4 – the step wise approach (using DECCA) is referred to, however this has not been demonstrated within the document. Details regarding how the application has followed the step wise approach (using DECCA). There also needs to be a long-term management plan – see requirement below for a detailed long term Landscaping, Habitat & Ecology Scheme (LHES). NB the GIS can only be evaluated with full details of this plan.

Document 3

Page 7, Trees to be removed: *“The total number of trees to be removed for this scheme in 4No individuals, and the partial removal of 2No hedges as a part of this development.”*

Page 9. Table 7: Summary of Tree Works:

4No trees to be removed (T05, T06, T07, T08). In addition, there are 7No hedges and trees earmarked for pruning (H01, H02, H03, T10, T11, T12, T13) and 2No hedges earmarked for partial felling (H02 and H03).

- T05 – common alder
- T06 – common alder
- T07 – silver birch
- T08 – Scot’s pine
- T10 – Common holly
- T11 – Common horse chestnut
- T12 – Common holly
- T13 – Scot’s pine
- H01 – Cherry laurel
- H02 – Cherry laurel
- H03 – Various (inc box and cherry laurel)

This information regarding tree removal does not align with the information in Documents 1 and 2 – see sections above.

REQUIREMENTS

A biodiversity data search is required for this application and needs to be included within Document 1.

Document 1 will be amended in relation to bat and bird boxes (integrated design).

Page 10 (of 25) – the quoted (lighting) hyperlink is incorrect and requires amendment.

Information regarding the trees and hedges earmarked for removal must be consistent within all relevant documents including Documents 1-3. The same system for labelling the trees must be used across all the reports.

GLTAs have been undertaken for 2 No trees, one of which (T1 – Scot's pine. Document 1) has low suitability for roosting bats.

A Potential roost feature (PRF) inspection survey of T1 (=T08 in Document 3) is required prior to planning determination.

Further survey works and amendments to Document 1 regarding trees and hedges impacted by the development. All trees earmarked for works (felling, partial felling, pruning) must be subject to a full Ground level tree assessment (GLTA) and considered within the Document 1. If required, PRF inspection surveys will also be undertaken prior to planning determination.

A detailed long term Landscaping, Habitat & Ecology Scheme (LHES) is required. The LHES must include, but not be limited to, the following:

- Details of retained landscaping/habitat/green infrastructure
- Details of new landscaping/habitat/green infrastructure
- Details of INNS to be eradicated
- A planting plan
- Long term (at least 25 years) maintenance and management measures for all onsite landscaping/habitat/green infrastructure (both retained and new)
- Details of other ecological measures, e.g., bat boxes, bird boxes, hibernacula, gaps in boundaries for hedgehogs 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.
- Details of the responsible person

These details will allow a full appraisal of Document 2.

Any ecological mitigation, compensation, enhancement measures (e.g., *beetle banks, dead wood piles, floral borders, bee bricks, reptile/amphibian refugia, native scrub + grassland, fruit bearing trees, brash piles, gaps under boundaries for hedgehogs, bat boxes, bird boxes*), must be clearly marked on all relevant architect plans, drawings and elevations.

CONDITIONS

-
- 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 must conform to the latest guidance for wildlife-friendly lighting. The lighting plan will ensure the integrated bat boxes in the proposed extension will not be directly illuminated and that there will be dark routes to and from suitable habitat nearby.

NB other, existing, onsite lighting should be reviewed and changes to more wildlife friendly lighting (as per the latest ILP/BCT guidelines) implemented as an enhancement measure.

-
- No development shall take place (including ground works, vegetation clearance) until a Construction Environmental Management Plan - Biodiversity (CEMP-B) has been submitted to and approved in writing by the local planning authority.

-
- No development shall take place (including ground works, vegetation clearance) a Precautionary Working Method Statement (PWMS) with consideration for protected species, e.g., bats / reptiles / amphibians / hedgehog / nesting birds, has been submitted to and approved in writing by the Local Planning Authority. The approved PWMS shall be implemented in full according to the specified timescales, unless otherwise agreed in writing by the local planning authority.

-
- No development shall take place (including ground works, vegetation clearance) until an INNS method statement has been submitted to and approved in writing by the local planning authority. This must include measures for Japanese knotweed, snowberry and cherry laurel.

-
- Evidence required that ecological measures have been installed, created, implemented etc will be required post-development.
-