

INTERNAL MEMORANDUM

To: Kate Glover
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 2
Date of previous memo: 07/05/2026
Date: 07/08/2026

SUBJECT: P/26/0094 | Proposed installation of additional solar PV panels and associated infrastructure on the roof of the existing office building and energy centre building. | Welsh Assembly Government Rhydycar Business Park Merthyr Tydfil CF48 1UZ

SITE DESCRIPTION

Office buildings close to scrub, woodland, grassland and wooded river corridor habitat (these habitats are suitable for a range of priority and protected fauna including bat and bird species).

DESIGNATED SITES WITHIN 500M OF THE APPLICATION SITE

- ✓ Site of Special Scientific Interest (SSSI) – x1: Cwm Glo a Glyndyrys (c.267m)
- ✓ Sites of Importance for Nature Conservation (SINC) – x3: closest, Rhydycar West (c. 227m)
- ✓ NRW Priority Area (Heathland + Grassland) – x1.

PRIORITY AND PROTECTED SPECIES WITHIN 500M OF THE APPLICATION SITE

- ✓ Birds (including Schedule 1¹ and Section 7² species);
- ✓ Fungi + Slime Moulds (including Section 7² species);
- ✓ Invertebrates (including Section 7² species)
 - ✓ Marsh fritillary butterfly (Section 7² species), closest record c.644m from site;
- ✓ Mammals
 - ✓ Bats (European protected species³ + some Section 7² species) - closest roost record for Unidentified bat species, c.527m from site);
 - ✓ Otter (European protected species³ + Section 7² species);
 - ✓ Hedgehog (Section 7² species);
 - ✓ Water vole.
- ✓ Reptiles (Section 7² species);
- ✓ Amphibians
 - ✓ Great crested newt (European protected species³ + Section 7 species) - closest record c.507m from site);
- ✓ Vascular plants (including Section 7² species).

DOCUMENT SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1. Rhydycar Merthyr Tydfil CF48 1DH. An Ecological Survey Report, Revision 2 *prepared by* Just Mammals Limited *on behalf of* Welsh Government. Dated: 21st July 2023.
2. Rhydycar Merthyr Tydfil CF48 1DH. Bat Survey Report, Version 1.0, *prepared by* Just Ecological Services Limited *on behalf of* Welsh Government. June 2023. Dated: July 2026.

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

³ Conservation of Habitats and Species Regulations 2017 (as amended)

COMMENTS

Document 2

The survey work undertaken is acceptable in terms of methodology and survey effort. The report is therefore also acceptable, with the following caveat.

Some of the concluding remarks seem contradictory. Para 9.9 sets out a range of ways of offering ecological gain for bats (and birds), whereas para 9.11 states that there is ‘... *no significant merit to add to ...*’ enhancement features already previously added to the building due to historic bat survey works.

Considering the content of Para 9.9, it may be this was included in error and written in relation to a different application as it talks, for example, about a ‘new build element’.

The ecologist should review this part of the report and make any necessary amendments.

Notwithstanding the above, there will need to be enhancement of the site in line with the Environment (Wales) Act 2016.

As the e-mail (dated 06/08/2026 @09:01) to the planning case officer from the agent of the applicant suggested that a similar number of bat and bird boxes to those previously installed could be put forward as enhancement measures.

The ecologist’s point within Para 9.11 (Document 2) has some validity. Therefore, enhancement on the site for the current application should instead focus on opportunities within the wider site to incorporate green infrastructure (which would have knock on benefits for protected species, e.g., bats and birds). This would fulfil requirements for enhancement, but also in relation to Planning Policy Wales (PPW 12), Chapter 6, which must also be considered where relevant to this application.

The main elements of the policy (that are likely to be relevant to this application) are as follows:

- *GREEN INFRASTRUCTURE: stronger emphasis on taking a proactive approach to green infrastructure, the submission of a proportionate **green infrastructure statement** [GIS] with planning applications and signposting Building with Nature standards.*
- *NET BENEFIT FOR BIODIVERSITY AND THE STEP-WISE APPROACH: further clarity is provided on securing net benefit for biodiversity through the application of the step-wise approach, including the acknowledgement of off-site compensation measures as a last resort, and, the need to consider **enhancement and long-term management** at each step. The use of the green infrastructure statement as a means of demonstrating the stepwise approach is made explicit. A simplified diagram of the policy approach has been developed (included within PPW12). The importance of strategic collaboration to identify and capture larger scale opportunities for securing a net benefit for biodiversity is recognised.*

Therefore, a GIS and a long-term habitat management plan are required – a Net Benefit for Biodiversity must be demonstrated.

For further information, see here - [Planning Policy Wales - Edition 12 \(gov.wales\)](#)