

INTERNAL MEMORANDUM

To: Rebecca Owens
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 2
Date of previous memo: 29/05/2025
Date: 15/08/2025

SUBJECT: P/25/0151 | Erection of residential annexe demolition of existing garage and erection of extension to accommodate replacement garage | Y Goedwig Cardiff Road Treharris CF46 5NB

DOCUMENT SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1. P/25/0151 - Erection of residential annexe - Y Goedwig, Cardiff Road, Treharris. Technical Note produced by BE Ecological Ltd. Document dated: 30/07/2025

COMMENTS

The garage building appears to have low suitability for roosting bats. Is the ecologist able to please answer the following? Have *all* areas (including voids/cracks/crevices) of the garage structure been thoroughly inspected? Is there any likelihood that evidence may have washed away or otherwise removed or may be hidden from view?

There is no detail regarding enhancements (I would expect there to be integrated bat and bird boxes to compensate for the loss of the garage structure) or consideration of PPW12, Chapter 6. There is no Green Infrastructure Statement or long-term management plan or information for example, regarding any removed trees and their replacement.

In addition, my comments in terms of the pre-emptive clearance have not been adequately addressed, other than the inclusion of the following statement – “*The client does not wish to manage the adjacent land to restore the ancient woodland.*”

See previous comments from memo #1 (29/05/2025) below in green.

REQUIREMENTS

There will need to be enhancement of the site in line with the Environment (Wales) Act 2016.

Planning Policy Wales (PPW 12), Chapter 6 must be considered where relevant to this application.

The main elements of the policy (that are or may 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.

- *PROTECTION FOR SITES OF SPECIAL SCIENTIFIC INTEREST: strengthened approach to the protection of SSSIs, with increased clarity on the position for site management and exemptions for minor development necessary to maintain a 'living landscape'. Other development is considered unacceptable as a matter of principle. Exceptionally, a planned approach may be appropriate where necessary safeguards can be secured through a development plan*
- *TREES AND WOODLANDS: closer alignment with the stepwise approach, along with promoting new planting as part of development based on securing the right tree in the right place.*

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

It is noted that a GIS has been submitted. Following the results of the PEA and PRA it is advised that the commissioned ecologist is consulted regarding the GIS and the long-term habitat management plan, which will also be required.

COMMENTS

Important issues that the commissioned ecologist may need to consider:

- Historic aerial imagery shows that part of the site to the west has relatively recently been cleared of habitat.
- Since 2020 a significant amount of woodland habitat has been removed, both onsite and close to site and both within and outside of an area of Ancient Semi-Natural Woodland.

This may have relevance for sections of PPW12 – see excerpts below:

“Potential applicants should not conduct any pre-emptive site clearance works before submitting a planning application as this can make it more difficult for a development proposal to secure a net benefit for biodiversity. Where a site has been cleared prior to development its biodiversity value should be deemed to have been as it was before any site investigations or clearance took place. A net benefit for biodiversity must be achieved from that point. Habitat status can be established through evidence remaining on site and local desk-based assessments (planning authorities must ensure that they have access to these data sources). In such cases, habitat status will be presumed to be good in the absence of any evidence to the contrary.”

“Ancient woodland, semi-natural woodlands, individual ancient, veteran and heritage trees and ancient hedgerows are irreplaceable natural resources, and have significant landscape, biodiversity and cultural value. Such trees, woodlands and hedgerows are to be afforded protection from development which would result in their loss or deterioration unless very exceptionally there are significant and clearly defined public benefits; this protection must prevent potentially damaging operations and their unnecessary loss. In the case of a site recorded on the Ancient Woodland Inventory, authorities should consider the advice of NRW. Planning authorities should also have regard to the Ancient Tree Inventory, work to improve its completeness and use it to ensure the protection of trees and woodland and identify opportunities for more planting as part of the Green Infrastructure Assessment, particularly in terms of canopy cover.”

“Proposals in statutory designated sites are, as a matter of principle, unacceptable and therefore must be excluded from site searches undertaken by developers. This principle also extends to those sites containing protected species and habitats which are irreplaceable and must be safeguarded. Such sites form the heart of resilient ecological networks and their role and the ecosystem services they provide must be protected, maintained and enhanced and safeguarded from development. It will be wholly exceptional for development to be justifiable in such instances.*

**Habitats, including the natural resources which underpin them, which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. Examples include, ancient woodland and veteran trees, ancient hedgerows, wet woodlands, sand dunes, peatland, species rich grassland, long undisturbed soils, blanket bog, salt marsh and lowland fen.”*

“Permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits. Where individual or groups of trees and hedgerows are removed as part of a proposed scheme, planning authorities must first follow the step-wise approach as set out in paragraph 6.4.15. Where loss is unavoidable developers will be required to provide compensatory planting (which is proportionate to the proposed loss as identified through an assessment of green infrastructure 139 Further advice in relation to ancient woodland is available on NRW's website. value including biodiversity, landscape value and carbon capture). Replacement 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. The planting position for each replacement tree shall be fit to support its establishment and health, and ensure its unconstrained long-term growth to optimise the environmental and ecological benefits it affords.”