

INTERNAL MEMORANDUM

To: Gareth Davies
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 2
Date of previous memo: 28/07/2025
Date: 26/09/2025

SUBJECT: P/25/0204 | Conversion of vacant chapel to 6 no. self contained flats | Brynhyfryd Chapel Thomas Street Treharris CF46 5AA

DESIGNATED SITES WITHIN 500M OF THE APPLICATION SITE

- ✓ Sites of Importance for Nature Conservation (SINC): x4 (closest, Afon Bargoed Taf, c.88m from site)
- ✓ Ancient Semi Natural Woodland (ASNW): x9

PRIORITY AND PROTECTED SPECIES WITHIN 500M OF THE APPLICATION SITE

- ✓ Birds (including Schedule 1¹ and Section 7² species);
- ✓ Fish (including Section 7² species);
- ✓ Invertebrates (including Section 7² species)
- ✓ Lichens (including Section 7² species);
- ✓ Mammals
 - ✓ Bats (European protected species³; some Section 7² species) - closest [possible] roost record for common pipistrelle, **within the Brynhyfryd Chapel Vestry**);
 - ✓ Otter (European protected species³; Section 7² species);
 - ✓ Hedgehog (Section 7² species);
 - ✓ Badger
- ✓ Reptiles (Section 7² species);
- ✓ Amphibians
 - ✓ Common toad (Section 7² species)
- ✓ Vascular plants

ECOLOGICALLY-RELATED DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1. Brynhyfryd Chapel, Thomas Street, Treharris, CF46 5AA. Bat Survey Report *prepared by I & G Ecological Consulting on behalf of FCE (Wales) Ltd.* Report reference: IG2025BrynhyfrydChapel. Version: 1. Status: Draft. Dated: 20/09/2025.
2. Brynhyfryd Chapel, Thomas Street, Treharris. Green Infrastructure Statement / Biodiversity Enhancement prepared by C2J Architects. **NB there is no version number or date, please could these be added?**

COMMENTS – General

- A Preliminary Ecological Appraisal (PEA) of any onsite vegetation (NB there are x2 separate red line boundaries) was requested by the LPA ecologist in comments from 28/07/2025. Is there another report detailing the results of this survey?
- The photographs within Document 1 show trees present close to the Chapel building that would require compensation as per PPW12 – see comments regarding the long-term management plan below).
- A long-term (25 year) landscape/habitat management plan is required. This must include, but not be limited to, the following:

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

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

- Details (including a plan/drawing) of existing/retained landscaping/habitat/green infrastructure.
- Details including a plan/drawing) of new landscaping/habitat/green infrastructure.
- NB Replacement tree planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost. Further details to be found in PPW12. NB replacement tree planting must be in the right place and not at the expense of other valuable and/or priority and protected habitats.
- A planting plan - NB all species will be native and of local (if not Welsh) provenance. This must also include the grass seed mix, which should be Emorsgate EL1 Flowering Lawn Mixture (<https://wildseed.co.uk/product/mixtures/complete-mixtures/special-habitat-mixtures/flowering-lawn-mixture/>) or equivalent.
- The immediate and long-term (for the lifetime of the development) establishment, maintenance and management measures for all [retained and new] onsite landscaping/habitat/green infrastructure.
- Timing, phasing and duration of construction activities and conservation measures.
- How a net benefit for biodiversity will be achieved within as short a time as possible and be locally responsive and relevant to local circumstances.
- 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. NB the funding mechanism must anticipate and take account of costs rising over time.
- Details of the responsible person(s) / management company.
- An internal and external Lighting Scheme must be submitted to and approved in writing by the local planning authority. This will include, but not be limited to:
 - Details of colour temperature and model of lighting used.
 - Details of lighting to be used both during construction and operation. The lighting shall be installed and retained as approved during construction and operation
 - Known roosts and wildlife boxes must not be illuminated (for example bat, bird) and there must be dark routes to allow barrier-free access to the boxes.
 - The Lighting Scheme must conform to the latest guidance (see below) and any updates to these documents or further guidance regarding lighting that may be published subsequently.
 - Guidance Note GN08/23 Bats and Artificial Lighting At Night. Bat Conservation Trust and The Institute of Lighting Professionals 2023 - <https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/>
 - Good Practice Guidance: Planning for the Conservation and Enhancement of Dark Skies in Wales. <https://www.gov.wales/sites/default/files/publications/2025-02/dark-skies-guidance.pdf>
- All enhancement measures, including bat boxes, bird boxes and gaps at boundaries for the free passage of hedgehogs must be clearly marked on all relevant architectural plans, drawings and elevations.

COMMENTS – Document 1

- Please could the unique SEWBRc reference number be quoted? NB this is a standard request for any report that includes biodiversity data.
- Page 7, 4.2.2 refers to '*P. auritus*'. It is assumed this is meant to be '*P. pipistrellus*'. Please can this be amended?

- Common pipistrelle bats, for example, are known to hibernate within buildings. In the absence of any definite data to the contrary, it should be assumed that hibernating bats are present and the hibernation season should be avoided for any works that could impact bats during this time. Please could this be reflected in the Outline Method Statement?
- Please can the Outline Method Statement also include the following:
 - Detail of the access (e.g., position, dimensions) that is to be maintained on the western gable end;
 - Course of action to be taken should the licence require amendment (e.g., due to the discovery of more bats than licenced, a different type of roost or species other than *P. pipistrellus*?
- Document 2 includes elevation plans showing raised ridge tiles to provide bat roosting opportunities. This is welcomed but does they are not referred to in Document 1. Please could they be added?
- Please could a swift box also be added to the eastern gable end?

COMMENTS - Document 2

- There is no version number or date, please could these be added?
- The general comments above query the existence of a PEA report (as previously requested). This is needed as a baseline from which to provide a Net Benefit for Biodiversity (NBB) and calculate appropriate compensation for any trees that may be lost because of the development.
- The GIS also requires the following information:
 - A demonstration of how the step-wise approach (the means of demonstrating the steps taken towards securing a Net Benefit for Biodiversity) has been applied;
 - The highlighting and description of up-to date baseline data considered and up-to-date surveys and assessments undertaken.
 - Consideration of ecosystem resilience by using the DECCA (Diversity, Extent, Condition, Connectivity, Adaptability) framework.
 - Cross reference with the long-term (25 year) landscape/habitat management plan.
- Document 2 includes elevation plans showing raised ridge tiles to provide bat roosting opportunities. This is welcomed but does they are not referred to in Document 1. Please could they be added?

INFORMATIVES / ADVISORY NOTES

The following must be added to the decision notice should planning permission be granted:

BATS

Warning: A European Protected Species (EPS) Licence is required for this development.

This planning permission does not provide consent to undertake works that require an EPS licence.

It is an offence to deliberately kill, injure, capture or disturb a bat or to recklessly damage or destroy their breeding sites or resting places. If found guilty of any offences, you could be sent to prison for up to 6 months and/or receive an unlimited fine. To undertake works within the law, you can obtain further information on the need for a licence from Natural Resources Wales on 0300 065 3000 or at <https://naturalresources.wales/permits-and-permissions/species-licensing/apply-for-a-protected-species-licence/bat-licences/?lang=en>

BIRDS

All birds, their nests and eggs are protected by law under the Wildlife and Countryside Act 1981 (as amended) while they are breeding.

If works to any trees, hedgerows and/or other nesting bird habitat (including buildings/structures with suitable features) are to be undertaken, they will take place outside of the bird nesting season. If the works must be undertaken during the nesting season (generally from 1st March until 31st August, although birds are known to nest outside of these dates in suitable conditions), a breeding bird survey will be required and must be

carried out by a suitably qualified ecologist. Any active nests identified will be protected until the young have fledged.

Where a Schedule 1 species (as defined in the Wildlife and Countryside Act - <https://www.legislation.gov.uk/ukpga/1981/69/schedule/1>) is involved, compensation for impacts, e.g., loss of nesting sites, will be devised and implemented.