

27 January 2026

Ysgol Rhyd-y-Grug, Aberfan

Technical Note: Response to Consultation Response from Nature Conservation Dated 19 November 2025

Planning Application Reference: P/25/0048

Prepared by: Acer Ecology Ltd

Date: January 2026

A. Introduction

1. Acer Ecology Ltd has been instructed by John Weaver Contractors Ltd to provide ecological and landscape advisory services related to the proposed construction of a new teaching block comprising Meithrin, Nursery, and Community Room; an external covered walkway linking the new block to the existing school; and associated works at Ysgol Rhyd-y-Grug, Aberfan (hereafter referred to as the site).
2. This Technical Note has been prepared in response to comments received from the Local Planning Authority's (LPA) Nature Conservation Officer dated 19 November 2025. The comments were specific to the submitted Landscape Management Plan (LMP)¹ for planning application P/25/0048² and referred to in LPA correspondence as 'Document 13'. The LMP (February 2025; ref. RYG-ATR-XX-XX-T-L430001) and Outline Planting Specification (RYG-ATR-XX-XX-T-L-400001)³ were prepared by AtkinsRéalis UK Ltd with associated landscape drawings soft works plan (RYG-RL-XX-ZZ-DR-L 08001 Rev P01)⁴ and planting plan (RYG-RL-XX-ZZ-DR-L 08301 P01)⁵ prepared by Roberts Limbrick.
3. This Technical Note clarifies, supplements, and where necessary amends the approved LMP in order to fully address the matters raised. Where any discrepancy arises between this Technical Note and the approved LMP, the provisions of this Technical Note shall take precedence.
4. Quoted text from the Nature Conservation Officer's consultation response is reproduced in italics and is followed by Acer Ecology Ltd's response.

B. Lifetime Management

5. *"This document must make it clear that the management plan is for the lifetime of the development."*
6. The LMP² is applicable for the lifetime of the development.
7. The initial five-year establishment and aftercare period represents the early management phase only, during which planting establishment, replacement of failures, and intensive monitoring will occur. Following this period, the same landscape management objectives, principles, and performance standards shall continue in perpetuity, subject to adaptive management and periodic review.

¹ https://enterprise.merthyr.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=A1E6EDBA514A4FB1B2B5D432F93B0E37

² <https://publicaccess.merthyr.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=SQYNZEKQJ1600>

³ https://enterprise.merthyr.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=A1E6EDBA514A4FB1B2B5D432F93B0E2C

⁴ https://enterprise.merthyr.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=A1E6EDBA514A4FB1B2B5D432F93B0E56

⁵ https://enterprise.merthyr.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=A1E6EDBA514A4FB1B2B5D432F93B0E63

8. The LMP² currently states 'A review of this LMP² and Maintenance Schedule, by the contractor and school, is recommended to take place each year within the 5 (five) year maintenance period to ensure the Scheme; both hard and soft, are maintained in a good condition for the longevity of the lifetime of the development.' This Technical Note adds to that statement, in that after the initial five-year maintenance period, a review will take place every five years for the lifetime of the development.
9. Long-term management will ensure the sustained delivery of landscape, ecological, amenity, and biodiversity benefits throughout the operational lifetime of the development.

C. Green Roof Management

10. *"It must include management of the green roof."*
11. The Elemental Build Ups Plan (RYG-RL-02-ZZ-DR-A 20301 Rev C02)⁶ and Proposed GA Roof Plan (RYG-RL-02-RF-DR-A 02102 Rev C02)⁷ both include details of the green roof, but not its management.
12. The Axter Technical Data Sheet Hydrosol Blankets and Plugs (GG-sedum plug/s gg/wildflower plug/w V1 27/01/2025)⁸ and Axter Living Roof Maintenance Guide: A Guide to Axter Waterproofing System Maintenance⁹ provide additional detail on management tasks.
13. A biodiverse green roof forms part of the approved development proposals and shall be managed for the lifetime of the development. Management will include:
- 14.

During Installation

- The Axter seed mix for green roofs will be applied evenly onto the prepared Axter brown roof substrate by hand-broadcasting, seed fiddle, or seed/fertilizer distributor. Raking after sowing will be undertaken, particularly in dry weather and with freshly worked loose soil; this will press the seed into contact with the soil and bring moisture to the surface by capillary action. In wet weather a good rain after sowing will wash the seed in and settle the soil surface;
- Watering will be undertaken for 10 weeks after installation;
- Regular fertilising will be undertaken to provide additional nutrients to enhance germination, flowering and resistance to extremes of weather. It is recommended that a slow release fertiliser is applied to the Hydropack at the start of spring (25gm/m²). A product such as Osmocote Exact (produced by Scotts) with a formula NPK 15-9-9 should be applied by a hand spreader to ensure even coverage. Some seeds are slower to germinate than others and some may not germinate until the following year. In addition, some seeds will not flower in the first year.

After Installation

- The seed mix may take two growing seasons to become fully established and produce a full floral display. During this time other wind-blown seeds may also establish themselves and should be removed;
- After installation two visits will be made in the first month to ensure that the vegetation is in a good condition and to observe any anomalies;
- Two visits will be made in the second three to six months later to verify the root growth and to effect any reinstatement that may be necessary;
- After the green roof is established at least two maintenance visits are made to the roof each year, the first in early spring and the second in late autumn, to ensure that leaf fall is not adversely affecting drainage performance;

⁶ https://enterprise.merthyr.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=0EB912163260492A805030708C501F7A

⁷ https://enterprise.merthyr.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=0EB912163260492A805030708C501F73

⁸ <https://cdn.craft.cloud/7d94298c-1662-4da6-b47f-72274577d639/assets/files/TDS-Axter-Hydrosol-Blankets-Plugs.pdf>

⁹ https://files.mutualcdn.com/axter/downloads/Axter-Living-Roof-Maintenance-Guide_0819.pdf

- Watering will be undertaken during prolonged dry periods or periods of high temperatures. Care will be taken not to over water;
- Dead heading the *Sedum* plants will be undertaken as required;
- Re-plant any missing *Sedum* fragments will be undertaken as required;
- Manual removal of undesirable or invasive species;
- Manual removal of dead plants. Bare ground left will be retained as habitat.
- Replacement planting where failures occur, ensuring continuity of vegetative cover and biodiversity function;
- Light hand weeding once or twice a year to keep out wind-blown seeds;
- One main cut in late autumn, removing all cuttings;
- A spring cut will be undertaken if required if the grasses become too dominant;
- Inspection and maintenance of drainage outlets, edge details, and substrate depth;
- Periodic review of species composition and condition, with adaptive management to respond to climate change and ecological performance
- Inspections during the establishment phase (minimum twice annually) to confirm successful vegetation establishment and substrate stability; and
- Annual inspections thereafter for the lifetime of the development.

D. Retained Landscaping, Habitat, and Green Infrastructure

15. *"Details (including a plan/drawing) of the onsite retained landscaping/habitat/green infrastructure."*
16. All retained trees, vegetation, and green infrastructure are clearly identified on the approved Landscape General Arrangement drawings and within Appendix A of the LMP².
17. These retained features shall be:
 - Protected during construction in accordance with BS5837:2012;
 - Maintained to ensure long-term health, structural integrity, and ecological value; and
 - Incorporated into the long-term landscape management framework.
18. In relation to the current drawings, the Colour plan shows trees to be retained (seven shown) while the Existing Site and Tree Removal Plan Drawing shows 20+ trees being retained. In addition, the Ground Level Tree Assessment includes details of trees to be retained but does not include any information on those to be lost, while the PEA refers to the retention and protection of habitats on site wherever possible, including woodland and hedgerows, but does not include details. Further, the Soft Works Plan and Soil Detail Plan both include details of retained habitats.

E. New Landscaping, Habitat, and Green Infrastructure

19. *"Details including a plan/drawing of the onsite new landscaping/habitat/green infrastructure."*
20. The Colour Plan and Landscape General Assessment Plan both show three patches of scrub (in two locations) being removed. No trees will be removed as part of the works. The Colour Plan shows trees to be retained (seven shown) and new tree planting (three shown) as well as new ornamental planting, wildflower meadow planting, new bio-retention/rain garden/SUDs Swale Feature, reinstated amenity grass, and new bulb planting.
21. The GIS includes details of planting, including a timescale for wildflower meadow planting. It states that it is to be mown annually in late summer or early autumn to a height of 10 cm to maintain health and diversity. Further, the Landscape Details and Planting Schedule Plan provides details of the species to be planted. These include those in containers, swale banks, wildflower meadow, amenity grass seed, and bulbs. Moreover, the Planting Strategy includes a list of suitable plant species, the Soft

Works Plan includes details of new habitats, and the Soil Detail Plan includes information on new habitats.

22. New landscaping and habitat creation includes:

- Native tree and hedgerow planting;
- Wildflower meadow creation;
- Ornamental planting areas;
- Sustainable Drainage Systems (SuDS), including swales and rain gardens;
- The biodiverse green roof; and
- Habitat enhancements including bat boxes and hedgehog shelters.

F. Replacement Tree Planting and Compensation

23. *"Replacement tree planting shall be at a minimum ratio of 3:1 three new trees for every tree lost*

24. No trees will be lost as part of the development. Some scrub will be lost but all of the trees present on site will be retained.

25. *Where woodland or shelterbelt loss occurs, compensation planting shall be delivered in accordance with Planning Policy Wales (PPW12), at a minimum density of:*

- *1,600 trees per hectare for broadleaves; and*
- *2,500 trees per hectare for conifers.*

26. No woodland or shelterbelt loss will occur as a result of the development.

27. The Colour Plan shows three areas of habitat removal (in two locations) being removed. No trees are present in this area.

28. New tree planting of three trees is proposed as well as new ornamental planting, wildflower meadow planting, new bio-retention/rain garden/SUDs Swale Feature, reinstated amenity grass, and new bulb planting. In addition, the Planting Plan includes details of trees to be retained and removed as well as information on all new and retained planting. This plan also shows three trees to be removed (two have already been removed). Further, the Landscape Details and Planting Schedule Plan states that three individual Silver birch (*Betula pendula*) will be planted on site. Moreover, the Soft Works Plan shows three areas of habitat being removed, with no trees present in these areas.

29. This Technical Note therefore concludes no trees will be lost as part of the development.

30. The planting plan shows three new trees to be planted with none being lost and so the planting complies with the 3: 1 ratio.

31. Section 4.7.1 of the PEA includes details of tree species that could be planted as well as including a link to the Woodland Trust packs that are available to schools.

G. Planting Plan – Native Species and Climate Change

32. *"All species will be native and of local (if not Welsh) provenance. The impacts of climate change must be taken into consideration)."*

33. With the exception of defined formal landscape areas, all planting will comprise native species of local provenance, and where practicable of Welsh origin. Formal landscape areas may incorporate a limited

palette of non-native or ornamental species where this is integral to the intended design character and function of these spaces.

34. Species selection across the site will take account of projected climate change impacts, including increased rainfall variability, temperature extremes, and heightened pest and disease pressures. This approach will enhance long-term resilience, reduce maintenance requirements, and support sustainable biodiversity outcomes while allowing appropriate design flexibility within formal landscape settings.
35. Section 1.4 of the GIS refers to native planting, although it does not specific Welsh provenance. In addition, Section 2.1 (Standards 2 and 9) of the GIS specifically refer to the green infrastructure design and how it positively responds to the climate emergency as well as delivering climate resilient water management. Further, Section 2.3 of the LMP covers the response to climate change, noting that the contractor company is to adopt the current best practice in view of emerging climate change trends. This include adaptations to reduce carbon emissions where reasonably feasible to do as well as sourcing appropriate alternative plant species which could be used to fulfil the same function without detrimental effect to the existing plant communities. Section 4.1 also refers to climate change while Appendix B includes suggested wildflower species mixes, all of which are native. Moreover, Sections 4.1, 4.6.1, and 4.71. of the PEA refer to the use of native species of local provenance grown in the UK for any new planting on the site.
36. Silver birch is considered an appropriate species in the context of climate change due to its ecological adaptability, rapid growth, and pioneer characteristics, allowing it to establish readily in disturbed or changing environments. Its early maturity and strong regenerative capacity enable populations to respond dynamically to shifting climatic conditions, supporting resilience at the landscape scale.
37. The species also makes a valuable contribution to ecosystem resilience, supporting a wide range of associated invertebrates and fungi and enhancing habitat diversity. Its relatively short life cycle allows for faster turnover and adaptive replacement, reducing long-term climate risk where conditions change.
38. While less tolerant of prolonged drought and extreme heat, silver birch remains suitable on sites with adequate soil moisture and where planted as part of a diverse species mix. In this context, it supports structural and species diversity and contributes positively to climate-adaptive planting strategies.

H. Establishment, Maintenance, and Long-Term Management

39. *"Immediate and long-term establishment, maintenance, and management measures for all onsite landscaping/habitat/green infrastructure."*
40. The Outline Planting Schedule refers to the LMP² on these aspects while Section 3 of the LMP² covers this aspect. Responsibility for the first five years will be with the main contractor and will then pass to the LPA's grounds maintenance team to be included in their management regime. Table 4.1 also covers management requirements for onsite landscaping/habitat/green infrastructure, including frequency. In addition, Section 4.7.2 of the PEA notes that an active management regime will be required, in which thinning, and the removal of scrub occurs every three years. In order to avoid the risk of adversely affecting nesting bird species, the management will take place during November to February inclusive.
41. The establishment, maintenance, and long-term management measures set out in the LMP² apply to all retained and newly created landscape, habitat, and green infrastructure features for the lifetime of the development.

Management prescriptions include:

- Replacement of failed planting;
- Meadow cutting and arisings removal;
- Tree and shrub maintenance;
- SuDS management; and
- Ongoing monitoring and adaptive management.

These measures shall be reviewed and adjusted as necessary to respond to site conditions, climate change, and biodiversity performance.

I. Phasing of Construction and Conservation Measures

42. *"Please also ensure that the document also details all the following (if not already included): Timing, phasing and duration of construction activities and conservation measures."*
43. The PEA (Section 4.5.1) recommendations include the production of a Construction and Environmental Management Plan (CEMP) for the works, and this is to include the phasing of construction and conservation measures. The document is to be reviewed at set intervals and new information added as appropriate. In addition, the Outline Planting Schedule covers timing of planting of trees and shrubs as well as timing of seeding.
44. Landscape protection and habitat conservation measures shall be implemented during construction in accordance with the CEMP (Acer Ecology 2026) which included details on the following:
 - Tree protection plans;
 - BS5837 requirements for retained trees; and
 - Ecological best practice.

J. Monitoring and Reporting

45. *"Please also ensure that the document also details all the following (if not already included): Monitoring post-development for all onsite landscaping/habitat/green infrastructure (both retained and new) and other ecological measures."*
46. Post-development monitoring shall include:
 - Retained and newly created habitats;
 - SuDS features;
 - Green roof performance;
 - Tree and planting establishment; and
 - Biodiversity enhancements.
47. Monitoring will be undertaken annually during the establishment period (i.e for the first five years), with periodic monitoring (five-yearly) thereafter for the lifetime of the development. Findings will inform adaptive management.

K. Biosecurity Risk Assessment and Management

48. *"A long-term (for the lifetime of the development) biosecurity risk assessment and management plan covering onsite areas."*
49. A long-term biosecurity approach shall be implemented for the lifetime of the development, addressing:

- Risks from pests, diseases and invasive non-native species;
- Inspection and early detection measures;
- Management and containment procedures;
- A monitoring report produced annually during the establishment period (i.e for the first five years), with periodic monitoring (five-yearly) thereafter for the lifetime of the development.

L. Cross-Referencing with Ecological Documents

50. *"Please also ensure that the document also details all the following (if not already included): Cross referencing with other relevant ecological documents."*
51. This Technical Note includes all appropriate cross-references to other relevant ecological documents produced in relation to the application. The cross-reference is included within each point, as appropriate.
52. The following reports/plans were reviewed and relevant cross-references are included against the appropriate points. All documents can be found online under planning application P/25/0048¹:
- Colour Plan Drawing No. RYG-ATR-XX-XX-I-L-400001 Rev P01
 - Drainage Strategy Report
 - Elemental Build Ups RYG-RL-02-ZZ-DR-A 20301 Rev C02
 - Existing Site and Tree Removal Plan Drawing No. RYG-ATR-XX-XX-D-L-4800001 Rev P01
 - Green Infrastructure Statement
 - Green Roof Edge Detail RYG-RL-02-RF-DR-A 04203 Rev C02
 - Ground Level Tree Assessment
 - Landscape GA Drawing No. RYG-ATR-XX-XX-D-L-400001 Rev P01
 - Landscape Management Plan (New Extension) RYG-ATR-XX-XX-T-L-430001
 - Landscape Details and Planting Schedule RYG-ATR-XX-XX-D-L-434001 Rev P01
 - Outline Planting Specification Report RYG-ATR-XX-XX-T-L-400001
 - Preliminary Ecological Appraisal (Acer Ecology)
 - Dusk Bat Survey Report (Alder Ecology)
 - Bat Method Statement (Alder Ecology)
 - Construction and Environmental Management Plan (CEMP) (Acer Ecology)
 - Planting Plan RYG-RL-XX-ZZ-DR-L 08301 P01
 - Planting Strategy
 - Proposed Drainage Layout (Sheet 1) Drawing No. CAM-ZZ-XX-DR-C-1101 Rev P03
 - Proposed Drainage Layout (Sheet 2) Drawing No. CAM-ZZ-XX-DR-C-1102 Rev P02
 - Proposed Drainage Layout (Sheet 3) Drawing No. CAM-ZZ-XX-DR-C-1103 Rev P03
 - Proposed Drainage Layout (Sheet 4) Drawing No. CAM-ZZ-XX-DR-C-1104 Rev P03
 - New Build Proposed GA Roof Plan RYG-RL-02-RF-DR-A 02102 Rev C02
 - Soft Works Plan RYG-RL-XX-ZZ-DR-L 08001 Rev P01
 - Soil Detail Plan RYG-RL-XX-ZZ-DR-L 08101 Rev P01
 - Tree Pit Details RYG-RL-XX-ZZ-DR-L 08401 Rev P01
 - Tree Report
 - The Axter Technical Data Sheet Hydrosol Blankets and Plugs (GG-sedum plug/s gg/wildflower plug/w V1 27/01/2025)
 - Axter Living Roof Maintenance Guide: A Guide To Axter Waterproofing System Maintenance

M. Funding Mechanisms

53. *"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."*

54. Landscape management, maintenance and monitoring shall be funded for the lifetime of the development. Funding mechanisms shall:

- Be secured by the site owner / management authority;
- Anticipate rising costs over time, including inflation; and
- Ensure that management objectives can be delivered in perpetuity.

N. Responsible Parties

55. *"Details of the responsible person(s) / management company."*

56. Section 3 of the LMP² states that responsibility for the first five years of landscape works will be with the main contractor and will then pass to the LPA's grounds maintenance team. In addition, the PEA states that the CEMP will identify the responsibilities of various organisations and people to comply with legislation and ensure that mitigation measures are implemented as proposed.

57. Responsibility for landscape management will be as detailed in the table below:

	Company Name	Contact Details
Client	Merthyr Tydfil County Borough Council	Chris Jones Tel: 01685 725000 Email: chris.jones3@merthyr.gov.uk
Principal Contractor and Contract Manager	John Weaver Contractors	Derwyn Pugh Tel: 01792 464004 Email: derwyn.pugh@johnweaver.co.uk
Site Manager	John Weaver Contractors	Russell Williams Mobile: 07377 927 644 Email: russell.williams@johnweaver.co.uk
Site Environmental Manager	John Weaver Contractors	Jenny Jones Mobile: 07304 073 071 Email: jenny.jones@johnweaver.co.uk
Non-licensed Bat Supervision Ecological Clerk of Works (ECOW)	Alder Ecology	Roger Martindale Tel :07533 273 939 Email: rmartindale@btinteneret.com
Landscape Contractor	TBD	TBD
Green Roof Contactor	TBD	TBD
General ECOW	TBD	-

58. Responsibilities shall be assigned to roles rather than named individuals to ensure continuity.

O. Net Benefit for Biodiversity

59. *"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."*

60. Section 2.1 (Standard 3) of the GIS outlines how the proposed green infrastructure will maximise net environmental gain. In addition, Sections 4.6 and 4.7 of the PEA cover compensation, enhancement measures, and biodiversity net gain.

61. The development delivers a net benefit for biodiversity through:
- Native and locally appropriate planting;
 - Creation of wildflower meadows and SuDS habitats;
 - Installation of habitat features;
 - Green roof provision;
 - Long-term management and monitoring.
62. These measures are locally responsive and designed to deliver biodiversity benefits as early as practicable following completion.

P. Herbicide Use

63. *"General No herbicides will be used – please remove references to this within any and all relevant submitted documents (e.g., Document 13)."*
64. Table 4.1 of the LMP notes that physical weed control techniques such as hoeing are to be used to control weeds within planting beds and borders and swale. Weed killer treatment with a non-residual herbicide must be agreed with client in advance of use. In relation to wildflower meadow creation, Appendix 4 of the GIS states 'The chosen area must be cleared of existing vegetation by mowing, raking, or applying a non-residual herbicide. Rake the soil to create a fine tilth, ensuring an even surface for seed sowing.' It is confirmed that only mowing and raking methods will be employed. Pages 6 and 7 of the Outline Planting Specification Report refer to the use of herbicides prior to planting.
65. No herbicides shall be used at any stage of construction, establishment or long-term management.
66. This Technical Note supersedes all these mentions, and no herbicides will be used at any time. All references to herbicide use within the LMP, Outline Planting Specification and associated documents are superseded by this technical note. Weed control shall be undertaken exclusively through manual and mechanical methods.

Q. Review and Updating

67. *"Details of review periods and reporting of long-term (for the lifetime of the development) landscaping/habitat/green infrastructure management objectives."*
68. The LMP², as supplemented by this Technical Note shall be reviewed:
- Annually during the establishment period; and
 - At five-year intervals thereafter for the lifetime of the development.
 - Reviews shall inform adaptive management and ensure continued delivery of landscape and biodiversity objectives.

R. Summary

69. This Technical Note provides a comprehensive and robust response to the Nature Conservation Officer's consultation comments. With the clarifications and commitments set out above, it is considered that the LPA now has sufficient information to confirm compliance with relevant policy and legislative requirements, and to progress towards a positive planning determination.

Signed,

A handwritten signature in black ink, reading "Paul Hudson". The signature is written in a cursive, flowing style.

Paul Hudson, BSc, PgAD MCIEEM, Principal Ecologist / Director, January 2026

Appendix 1: Consultation Response

INTERNAL MEMORANDUM

To: Mel Ferreira
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 2
Date of previous memo: 27/02/2025
Date: 19/11/2025

SUBJECT: P/25/0048 | Construction of a new teaching block comprising Meithrin, Nursery and Community Room, an external covered walkway linking the new block to the existing school and associated works | Ysgol Rhyd Y Grug Primary School Aberfan Crescent Aberfan Merthyr Tydfil CF48 4NT

SITE DESCRIPTION

School site. Flat roof single storey building with associated playing fields and tarmac landscaping, parking areas access road and footpaths. There are some onsite trees and the site is bounded by woodland and sits close to the Afon Taff wooded river corridor.

ECOLOGICALLY RELATED DOCUMENTS SUBMITTED IN SUPPORT OF THE APPLICATION

1. Rhyd Y Grug School, Aberfan, Merthyr Tydfil, CF48 4NT. Bat Survey and Assessment *prepared by* Alder Ecology UK Ltd. AEUK 1598. Date: 25th September 2024.
2. Ysgol Rhyd-Y-Grug, Aberfan. Preliminary Ecological Appraisal *prepared by* Acer Ecology. Revision 1.1. Dated: 05 November 2025.
3. Ysgol Rhyd-Y-Grug, Aberfan. Green Infrastructure Statement *prepared by* Acer Ecology. Revision 1.2. Dated: 12 November 2024.
4. Ysgol Rhyd Y Grug Primary School. Arboricultural Assessment Survey *prepared by* Andrew Taylor. Dated: February 2024.
5. Planting Strategy. Date received: 24/02/2024.
6. New Build - General Arrangement Roof Plan Drawing No. RYG-ATR-02-00-D-A-15001 Rev P02. Date received: 24/02/2024.
7. Ysgol Rhyd Y Grug. Planting Plan *prepared by* Roberts Limbrick *on behalf of* Merthyr Tydfil County Borough Council. 11777-RL-XX-ZZ-DR-L. Number 08301. Revision P01. Dated: 26.09.2025.
8. Ysgol Rhyd Y Grug. Soil Detail Plan *prepared by* Roberts Limbrick *on behalf of* Merthyr Tydfil County Borough Council. 11777-RL-XX-ZZ-DR-L. Number 08101. Revision P01. Dated: 26.09.2025.
9. Ysgol Rhyd Y Grug. Soft Works Plan *prepared by* Roberts Limbrick *on behalf of* Merthyr Tydfil County Borough Council. 11777-RL-XX-ZZ-DR-L. Number 08001. Revision P01. Dated: 26.09.2025.
10. Ysgol Rhyd Y Grug. New Build Proposed GA Roof Plan *prepared by* Roberts Limbrick *on behalf of* Merthyr Tydfil County Borough Council. RYG-RL-02-RF-DR-A. Number 02102. Revision C01. Dated: 26.09.2025.
11. Ysgol Rhyd Y Grug. Landscape Details and Planting Schedule *prepared by* AtkinsRéalis UK Limited *on behalf of* Merthyr Tydfil County Borough Council. RYG-ATR-XX-XX-D-L-434001. Revision P01. Dated: 14.02.2025.
12. Document Ref: Green Roof Details Project ID:18200. Dated: 28/08/2024.
13. Ysgol Rhyd Y Grug. Landscape Management Plan (New Extension), Revision 1.0 *prepared by* AtkinsRéalis UK Limited *on behalf of* Merthyr Tydfil County Borough Council. RYG-ATR-XX-XX-T-L-430001. Dated February 2025.

14. Ysgol Rhyd Y Grug. Outline Planting Specification, Revision 1.0 *prepared by AtkinsRéalis UK Limited on behalf of Merthyr Tydfil County Borough Council*. RYG-ATR-XX-XX-T-L-400001. Dated 14 February 2025.

Comments

Document 1

As referred to at the pre-app stage, a Bat Method Statement will be needed to ensure there is no disturbance to the roost during the works.

Has this been supplied?

Document 4

Two trees earmarked for remedial works, with several others to be monitored. Before any works to trees are undertaken a Ground Level Tree Assessment (GLTA) must be undertaken by a suitably experienced and licensed bat ecologist to inform, for example, any further bat survey work, avoidance, mitigation, compensation or enhancement measures that may be necessary.

Has this been undertaken?

Any documents with references to species, including Documents 5, 7, 8, 9, 10, 11

All species (including those for the green roof) must be native and of local (if not Welsh or UK) provenance. Amendments are required.

Document 13

This document must make it clear that the management plan is for the lifetime of the development.

It must include management of the green roof.

Please also ensure that the document also details all the following (if not already included):

- Details (including a plan/drawing) of the onsite retained landscaping/habitat/green infrastructure.
- Details including a plan/drawing) of the onsite 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. 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. 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. *This must be demonstrated.*
- A planting plan - NB all species will be native and of local (if not Welsh) provenance. The impacts of climate change must be taken into consideration).
- 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.
- Monitoring post-development for all onsite landscaping/habitat/green infrastructure (both retained and new) and other ecological measures.
- A long-term (for the lifetime of the development) biosecurity risk assessment and management plan covering onsite areas.
- Cross referencing with other relevant ecological documents.

- 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
- 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.
- Details of review periods and reporting of long-term (for the lifetime of the development) landscaping/habitat/green infrastructure management objectives.

General

No herbicides will be used – please remove references to this within any and all relevant submitted documents (e.g., Document 13).

Lighting

Document 1 demonstrates the amount of lighting around the school. Ambient lux levels are relatively high around most of the buildings. The lights also appear to have a relatively high colour temperature, appearing white in nature.

A whole site lighting scheme is required to review and update the lighting around the site.

The existing and any proposed lighting (external and internal) will need to conform to the following guidelines:

- <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>
- <https://www.gov.wales/sites/default/files/publications/2025-02/dark-skies-guidance.pdf>

NB there must be marked improvement in terms of lux levels and colour temperature (luminaires must have a colour temperature of 2700K or below) – using the ambient levels measured included in Document 1 as a baseline. A lighting professional should be commissioned to undertake the work.

This is still required.

Enhancements

All enhancements as referred to in Documents 1 and 2 must be fully described and specified and also marked on relevant architect plans, drawings and elevations.

CEMP-B

A Construction Environmental Management Plan - Biodiversity (CEMP-B) is required for consideration – as set out in Document 2.

COMPLIANCE

Evidence that ecological measures have been installed, created, implemented etc will be required on completion of the development. This evidence must be submitted to and approved in writing by the local planning authority.