

INTERNAL MEMORANDUM

To: Rebecca Owens
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 1
Date of previous memo: -
Date: 27/01/2021

SUBJECT: P/24/0141 | Two storey front extension and extension to side of house crane, conversion of hipped roof to ridged roof and other external alterations | Units 5 To 8 Phoenix Industrial Estate Goat Mill Road Dowlais CF48 3TD

ECOLOGICAL DOCUMENT SUBMITTED IN SUPPORT OF THIS APPLICATION

1. Smart Electrical Systems, 3-4 Phoenix Industrial Estate, Goat Mill Road, Merthyr Tydfil. Preliminary Roost Assessment prepared by Acer Ecology Ltd. Revision 1.0. Date: 18/11/2024.

COMMENTS

Document 1

- Page 11 includes the following quote from the Bat Survey Guidelines (Collins, 2023) – “ ... *if **sufficient** areas (including voids, cracks and crevices) of a structure have been inspected and no evidence found (and is unlikely to have been removed by weather or cleaning or be hidden) then further surveys **may not be** appropriate.*”
- The guidelines actually state the following – “*If **all** areas (including voids, cracks and crevices) of a structure have been inspected and no evidence found (and is unlikely to have been removed by weather or cleaning or be hidden), then further surveys **are not** appropriate.*”
- ‘Sufficient’ vs ‘all’ is a fundamental difference - please quote accurately when quoting from the guidelines. Please amend the quote in Document 1.
- The positions of the bat and bird boxes must be clearly marked on all relevant architect plans/drawings/elevations.
- The boxes must not be directly illuminated and there must be a dark route from the boxes to suitable nearby habitat. Please add this to Document 1. Dark areas/routes must be demonstrated.
- The dismantling of sensitive areas of the shed structure for bats must be undertaken under supervision from a suitably experienced and licenced bat ecologist. Please amend Document 1 to reflect this.

Other comments

- 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 \(gov.wales\)](https://gov.wales/planning-policy-wales-edition-12)