

INTERNAL MEMORANDUM

To	Kate Glover
From	Matt Davies
Memo #	2
Date	31/07/2026
Previous memo date	15/07/2026
Application:	P/26/0155 Change of Use of a building used for the storage of waste, plant and equipment to a renewable energy facility, including the construction of flue and ancillary works Plots 5 Pengarnddu Industrial Estate Dowlais Merthyr Tydfil CF48 2TA

SITE DESCRIPTION

Site used as a waste transfer station/recycling facility. The site is bounded by grassland, scrub habitat and small trees on the northern, eastern and southern boundaries. In the wider environment, there is grassland, heathland and large pond/reservoir habitat.

PROPOSED WORKS AND POTENTIAL IMPACTS

Proposed works	Likely impacts
Change of Use of a building used for the storage of waste, plant and equipment to a renewable energy facility, including the construction of flue and ancillary works	Possible impacts of exhaust gasses on local species and habitats including the SSSI site to the north.

DESIGNATED SITES WITHIN 500M OF THE APPLICATION SITE

✓ Site of Special Scientific Interest (SSSI)	1x - Mynyddoedd Llangynidr a Llangatwg, Cefn yr Ystrad a Chomin Merthyr (40m)
✓ Sites of Importance for Nature Conservation (SINC)	3x – closest, Merthyr Common North (40m)
✓ Within a Buglife B-Lines Area	

PRIORITY AND PROTECTED SPECIES WITHIN 500M OF THE APPLICATION SITE

<i>Species / Species Group</i>	<i>Closest record(s)</i>
✓ Birds (including Schedule 1 ¹ and Section 7 ² species);	Dunnock, house martin, meadow pipit, peregrine (c.53m)
✓ Fungi + Slime Moulds (including Section 7 ² species);	Crimson waxcap (c.688m)
✓ Invertebrates (including Section 7 ² species)	Scarce blue-tailed damselfly (c.XXXm)
✓ Marsh fritillary butterfly (Section 7 ² species);	(c.767m)
✓ Mammals	
✓ Bats (European protected species ³ + some Section 7 ² species);	Closest records - Common pipistrelle and unidentified <i>Myotis</i> species (c.633m)

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

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

	Closest roost record - Lesser horseshoe bat (c.1601m)
✓ Otter (European protected species ³ + Section 7 ² species);	(c.294m)
✓ Dormouse (European protected species ³ + Section 7 ² species);	(c.1112m)
✓ Hedgehog (Section 7 ² species);	(c.317m)
✓ Water vole;	(c.955m)
✓ Amphibians	
✓ Common toad (Section 7 ² species);	(c.53m)
✓ Vascular plants (including Section 7 ² species).	Deergrass (c.53m)

DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1	Plot 5, Pengarnddu Industrial Estate, Dowlais, Merthyr Tydfil, CF48 2TA. Green Infrastructure Statement. Document Reference: 11145 GIS. <i>Prepared by Technia Environment and Planning Limited on behalf of Merthyr Biomass Ltd. Dated 01/07/2026.</i>
2	Merthyr Biomass Ltd. Ecological Enhancements. Drawing No: 11145 – 000 – D. <i>Prepared by Technia Environment and Planning Limited on behalf of Merthyr Biomass Ltd. Dated 01/07/2026.</i>
3	Pengarnddu Industrial Estate. Air Quality Assessment report. Report Reference: ZTEPPIE_AQA. Revision A, Final. <i>Prepared by DustScan AQ on behalf of Merthyr Biomass Ltd. Dated: 02/07/2026.</i>

REQUIREMENTS AND COMMENTS (new comments for memo #2 in green)

As the Mynyddoedd Llangynidr a Llangatwg, Cefn yr Ystrad a Chomin SSSI Merthyr sits almost adjacent to the site and given there will be exhaust emissions/gasses generated, NRW should be consulted on this application regarding any possible impacts.

NRW have provided comments regarding this application in a letter dated 29/07/2026 (NRW ref: CAS-313758-T8J7).

NRW have concerns with the application as submitted as inadequate information has been provided in support of the proposal in terms of its impact on protected sites including nationally designated and European protected sites.

Due to the potential impacts on European protected sites, MTCBC has undertaken Stage 1 (Screening) of a Habitats Regulations Assessment (HRA) of the proposed development. This has concluded that a likely significant effect on SAC sites cannot be ruled out and so the application is (at this stage) screened in for Stage 2 (Appropriate Assessment).

Document 3 (The Air Quality Assessment report) must be updated to consider ecological receptors and assess potential impacts on the following:

- Mynyddoedd Llangynidr a Llangatwg, Cefn yr Ystrad a Chomin SSSI
- Usk Bat Sites SAC
- Cwm Cadlan SAC

The Air Quality Assessment must be updated to include such an assessment.

Air pollutants [e.g., nitrogen dioxide (NO₂) and particulate matter (PM₁₀/PM_{2.5})] can have (direct and/or indirect) negative impacts the majority of the 56 special interest features of the Mynyddoedd Llangynidr a Llangatwg, Cefn yr Ystrad a Chomin SSSI, for example, blanket bog, raised bog, acid fen/ valley bog, wet dwarf shrub heath, dry

dwarf shrub heath, acidic and base-rich spring-fed mire, grassland fungi, bryophytes, grassland habitats, invertebrates, birds and bats.

The potential impacts of air pollutants on the designated features of the SAC sites are set out within the HRA Screening Assessment.

Following receipt of the updated Air Quality Assessment report, Stage 1 (Screening) of the HRA will be repeated.

OTHER COMMENTS

Will there be any new lighting onsite? If so, further details will be required.

Documents 1 and 2: Bird boxes should not be erected on western or northern elevations. Please omit the bird boxes and instead replace these on the western elevation with a second bat box. These should be erected at a height of at least 5m. Please amend both documents to reflect this.

The boxes must not be directly illuminated and there must be dark corridors to allow functional access.

The boxes must be maintained in perpetuity. This information must be added to Document 1 along with details of how this will be undertaken and funded. There must also be a timetable for implementation of these measures.