

INTERNAL MEMORANDUM

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

Memo number: 1
Date of previous memo: -
Date: 26/11/2024

SUBJECT: P/24/0260 | Demolition of buildings | 34-38 High Street Merthyr Tydfil CF47 8DE

ECOLOGICAL DOCUMENTS PRODUCED TO SUPPORT THE ABOVE APPLICATION

1. Merthyr Rail Station. Bat Survey Report (2023) *prepared by Redstart on behalf of MTCBC*. Project No: GC/003964 Doc Ref: GC3964-RED-74-XX-RP-L-0004 Rev: P01. Date: 31/07/2023.
2. Merthyr Rail Station. Roof Nesting Birds Survey Report *prepared by Redstart on behalf of MTCBC*. Project No: GC/003964 Doc Ref: GC3964-RED-74-XX-RP-L-0003 Rev: P01. Date: 24/07/2023.
3. Merthyr Tydfil Lower High Street. Technical Note: Internal Inspection Report *prepared by Redstart on behalf of MTCBC*. Reference: UK-WSP-70122512-RED-74-XX-RP-L-0001. Date: 27/09/2024.

COMMENTS

Document 2 includes mitigation for a colony of sand martins identified as nesting within the train station retaining wall. NB as this application for demolition does not include the retaining wall, the mitigation recommendations are not immediately relevant. When an application is made to demolish and re-build the wall these mitigation recommendations will be critical.

Documents 1 and 2 include the following enhancement recommendations:

Document 1,

“Bat friendly planting – Planting design should incorporate pollinator friendly planting to attract a wide [range of] invertebrates and enhance foraging opportunities for bats in the area.”

Document 2,

“Habitat Creation

When re-development of the site is carried out there is an opportunity to enhance the habitat for a range of bird species. Planting of locally sourced tree/shrub species within public spaces should be considered. Species could include hawthorn (Crataegus monogyna), hazel (Corylus avellana), bird cherry (Prunus padus), and/ or holly (Ilex aquifolium). Grouping together trees would be more beneficial providing food (berries) and dense cover for sheltering and nesting birds. Planting of locally sourced tree/shrub species would also make the area more aesthetically pleasing for visitors, residents, and workers in the area.”

Installation of House Sparrow Terrace Nest Box

Potential habitat such as buildings with holes and cavities suitable for roof nesting species will be permanently lost through demolition. House sparrows, a social to colonial (Ferguson-Lees, J. et al., 2011) UK red-listed species were found nesting just outside the main site survey area. Provision of one house sparrow terrace nest box will be placed in a suitable location under the guidance of a suitably qualified ecologist e.g., on, or incorporated into a suitable wall on a nearby building.

Schwegler or similar boxes are recommended for durability. Recommended make and model: 1SP Schwegler Sparrow Terrace, NHBS reference #185100 or #185099, available at: <https://www.nhbs.com/1sp-schweglersparrow-terrace>

Installation of Starling Nest Boxes

Starlings, a Red-listed species in the UK and Wales, known to nest in loose colonies often within building cavities were recorded flying in the surrounding area. Provision of three starling nest boxes will be placed in suitable locations under guidance of a suitably qualified ecologist e.g., on a suitable building nearby. Recommended make and model: Starling Nest Box, NHBS reference #179138; available at : <https://www.nhbs.com/woodpeckerstarling-nest-box>

Bird Boxes for Swift

Swift, a rapidly declining, Red-listed species in the UK and Wales, was recorded flying over the site and was previously recorded breeding west of the main site. Install two nest boxes specifically designed for nesting swifts to be mounted on suitable buildings at an appropriate height under the guidance of an ecologist. Recommended make and model: WoodStone Swift Nest Box, NHBS reference #217160; available at: <https://www.nhbs.com/woodstone-swift-nest-box>.”

This application (for building demolition) represents only the first stage of a wider redevelopment project. As such, the recommendations made above regarding habitat creation for the benefit of bats and birds will become relevant when the re-development plans are brought forward.

However, the recommendations made in Document 2 regarding bird boxes can be implemented and will be required.

NB the bird boxes as listed above are framed as *enhancement* measures, but *compensation* for bird nesting opportunities, lost because of the demolition, must first be provided. More bird box provision is therefore required. The report must make it clear which boxes are compensation for lost nesting opportunities, and which represent enhancements.

Additionally, similar recommendations for bat box provision must be made by the ecologists at Redstart and then implemented. NB the same consideration regarding compensation and then enhancement must be given.

Details of bat boxes and bird boxes, must be clearly marked on architect plans/drawings/elevations – including box model names where required.

Planning Policy Wales (PPW 12), Chapter 6 must *usually* 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)

As previously referred to, this application (for building demolition) represents only the first stage of a wider redevelopment project. As such, the consideration for PPW12, Chapter 6 will be given later when the re-development plans are brought forward.