



BLACKBRICK STUDIO

Architectural Practice, Cardiff Bay

Green Infrastructure & Biodiversity Statement

Revision 2 — Response to Local Planning Authority Comments

Project: Smart Electrical Systems, Goat Mill Road, Dowlais, Merthyr Tydfil, CF48 3TD

Original Issue: 12/01/2026

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Summary of Revisions — Response to LPA Comments (dated as per correspondence)

LPA Comment	Response / Revision
Boundary fencing: height, design, solid appearance, discordant with estate character; unclear justification for enclosing front car park	1.8m black anti-climb 358 mesh fencing proposed, set behind the retained front hedgerow. Fencing runs along the southern boundary and around the front car park; enclosure of the car park is retained and justified on security grounds (Section 3).
Trees removed at front of site — not shown on drawings or addressed in the GIS	Now addressed in Section 4. Replacement planting proposed at a minimum 3:1 ratio in accordance with PPW Edition 12.
Hedge replacement ratio (3:1); replacement shown over existing hedge; no species comparison; no long-term management plan	Access arrangement revised — the boundary hedgerow is now retained in full; no hedgerow removal is proposed (Section 5). A long-term establishment and management plan is provided (Section 8).
Wildflower and tussocky grass margins referenced but not shown on plan; no species mix or management plan	Margins now shown on the site plan within the landscaped buffer. Species mix provided in Section 7; establishment and management plan provided in Section 8.

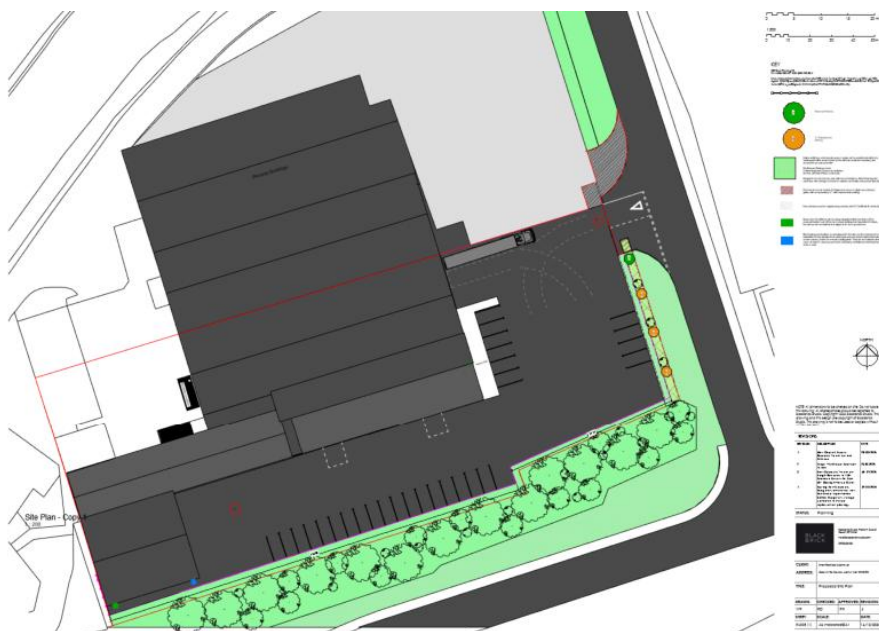
1–2. Site Description & Surrounding Area

- **1. Site Description**

- The unit is located within an established industrial estate in Merthyr Tydfil.

- **2. Surrounding Area Description**

- The site is positioned within a predominantly industrial setting, characterised by large-scale industrial buildings and associated commercial uses.
- Along the front (eastern) boundary, there is an existing hedgerow, retained in full under this revised scheme, providing natural screening to the frontage.
- To the south, overgrown vegetation and mature shrubbery lie outside the site boundary, creating a dense landscaped buffer and contributing to the green character of the roadside environment.
- This combination of industrial structures and pockets of established greenery frames the wider setting.



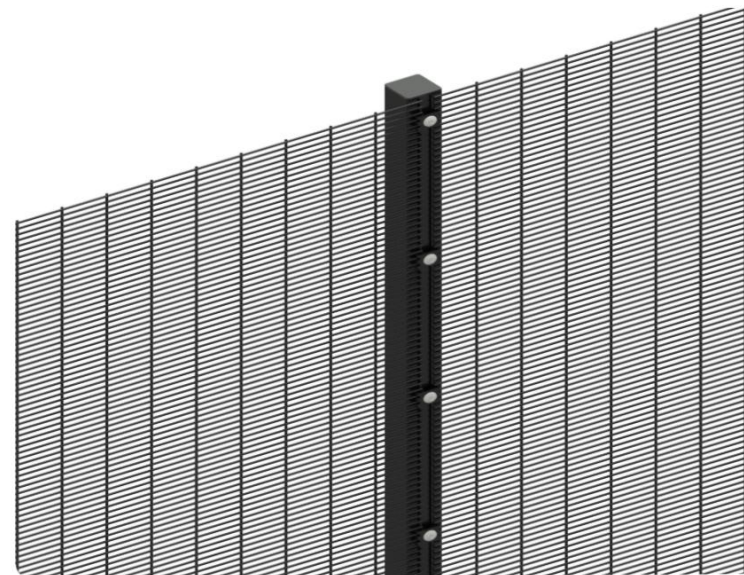
3. Boundary Treatment — Fencing & Security

• 3.1 Fencing Specification

- 1.8m high, black, 358 anti-climb weld mesh security fencing is proposed (product ref. CLA-MSH-358-KIT-1830-2530-DIG-BLK, dig-in posts).
- The fence is positioned behind the retained front hedgerow, maintaining boundary continuity and softening its visual impact when viewed from the highway.
- Fencing runs along the southern boundary and around the front car parking area.

• 3.2 Justification for Enclosure of the Front Car Parking Area

- The unit accommodates high-value electrical equipment and stock. Secure enclosure of the car parking and loading area is required to mitigate the risk of theft and unauthorised access to these assets.



4. Tree Removal & Replacement Planting

- During pre-construction site works, semi-mature tree(s) were removed from the road-facing (eastern) frontage of the site to facilitate the proposed development.

Number and species of trees removed:

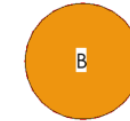
- to be confirmed following site verification
- In accordance with Planning Policy Wales (Edition 12), replacement planting will be provided at a minimum ratio of 3 trees for every 1 tree removed, of a similar type and comparable compensatory size, planted on-site or immediately adjacent to the site.

Proposed replacement species (native, suited to roadside/industrial setting):

- Rowan (*Sorbus aucuparia*)
- Silver birch (*Betula pendula*)
- Field maple (*Acer campestre*)
- Final species selection and exact quantity to be confirmed and shown on the tree planting plan.
- Aftercare and monitoring in accordance with Section 8 (Long-Term Establishment & Management Plan).



Removed Planting



3:1 Replacement planting



Native wildflower and tussocky grass margins will be established within the landscaped buffer areas shown on the site plan (southern boundary and around the car park perimeter)

Red fescue (*Festuca rubra*)
Crested dog's-tail (*Cynosurus cristatus*)
Smaller cat's-tail (*Phleum bertolonii*)

Margins to be cut once per year (late summer/autumn, after flowering and seed-set), with arisings removed to maintain low fertility and species diversity.

5. Hedgerow Retention & Protection

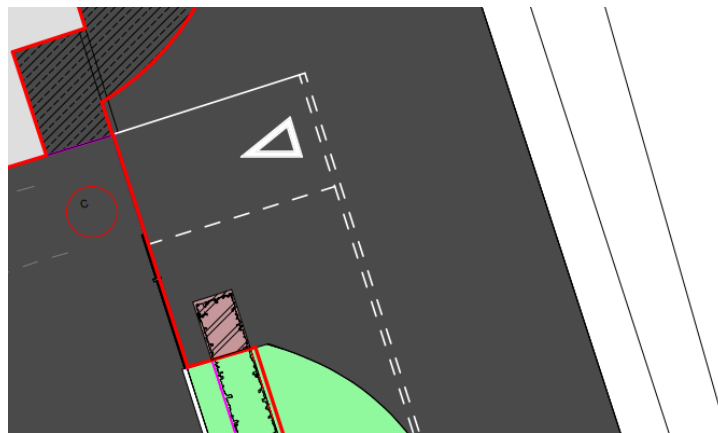
- Following review of the access and gate arrangement, the boundary hedgerow will be retained in full. No hedgerow removal is proposed as part of this application.

Revised access arrangement:

- to be confirmed / described
- The hedgerow will be protected throughout construction by temporary fencing installed in accordance with BS 5837:2012 (Trees in relation to design, demolition and construction).

Existing hedge species composition:

- to be confirmed by supervising ecologist / site survey
- The new security fencing (Section 3) will be positioned behind the hedge line, preserving both boundary continuity and the hedgerow's ecological and screening value.



Removal of a small section of hedgerow to accommodate new entrance gates, with compensatory 3:1 ratio replacement planting.



New entrance area for neighbouring property unit 6/7 Certificate B ownership.



Beaumaris WoodStone bat box being integrated within the fabric of the proposed exterior wall of the commercial building (see Appendix 5). Ideally, the bat box will be installed at a height of 4m from ground level.



Bird nesting opportunities on and adjacent to the site could be enhanced by the installation of one standard hole nest boxes and one open fronted nest boxes on the masonry of the commercial building itself. They will be located in dense cover, at least 3m above ground level and ideally orientated so that they face north or east.

6. Biodiversity Enhancement — Habitat Features & Lighting

• 6.1 Habitat Features

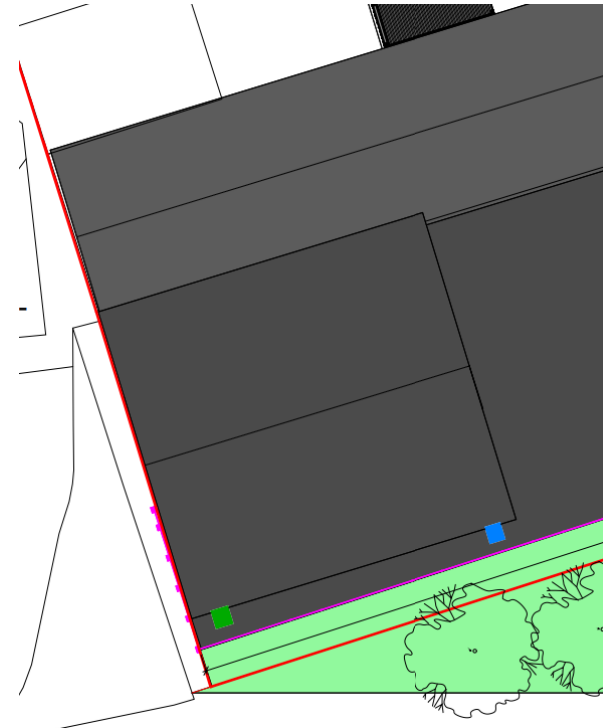
- Installation of bird and bat boxes in accordance with the site plan.
- Incorporation of nectar-rich and fruit-bearing native species within the replacement tree planting (Section 4) and landscaped margins.

• 6.2 Green Infrastructure Connectivity

- New planting will maintain ecological links between the front boundary hedgerow and the shrub-rich areas to the south.
- Improvements will strengthen the site's role in the local green corridor network.

• 6.3 Management of External Lighting

- Smart motion-sensor lighting will be installed.
- Warm-temperature lighting (approx. 2700K, PIR-controlled) will be used to minimise ecological disturbance, especially to bats and nocturnal species.
- Lighting will be directed downward and fully shielded, reducing light spill beyond the immediate work area and away from the retained hedgerow.



Beaumaris WoodStone bat box being integrated within the fabric of the proposed exterior wall of the commercial building (see Appendix 5). Ideally, the bat box will be installed at a height of 4m from ground level.



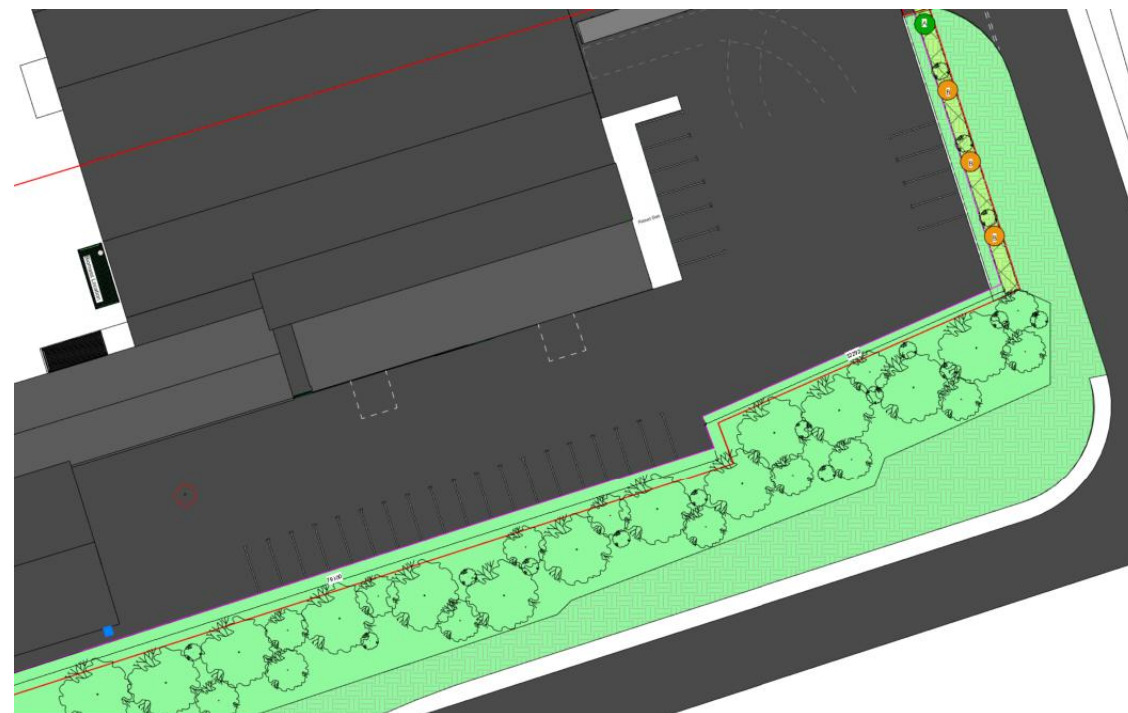
Bird nesting opportunities on and adjacent to the site could be enhanced by the installation of one standard hole nest boxes and one open fronted nest boxes on the masonry of the commercial building itself. They will be located in dense cover, at least 3m above ground level and ideally orientated so that they face north or east.

7. Wildflower & Pollinator Margins

- Native wildflower and tussocky grass margins will be established within the landscaped buffer areas shown on the site plan (southern boundary and around the car park perimeter).
- Proposed general-purpose native wildflower and grass seed mix, selected for pollinator value:

Grasses	Wildflowers
Red fescue (<i>Festuca rubra</i>) Crested dog's-tail (<i>Cynosurus cristatus</i>) Smaller cat's-tail (<i>Phleum bertolonii</i>)	Common knapweed (<i>Centaurea nigra</i>) Oxeye daisy (<i>Leucanthemum vulgare</i>) Bird's-foot trefoil (<i>Lotus corniculatus</i>) Yellow rattle (<i>Rhinanthus minor</i>) Red clover (<i>Trifolium pratense</i>) Ribwort plantain (<i>Plantago lanceolata</i>) Wild carrot (<i>Daucus carota</i>)

- Margins to be cut once per year (late summer/autumn, after flowering and seed-set), with arisings removed to maintain low fertility and species diversity.



8. Long-Term Establishment & Management Plan

Element	Establishment (Year 1)	Ongoing (Years 2–5)	Monitoring / Responsibility
Replacement trees (3:1)	Stake/tie check; water in dry periods (May–Sep); weed-free mulch circle maintained; failures replaced within the next planting season	Formative pruning as needed, outside bird nesting season (Mar–Aug); stakes/ties removed once established (approx. Year 3)	Annual condition check each autumn; landowner/managing agent responsible; like-for-like replacement of failures
Retained boundary hedgerow	Protective fencing maintained for the duration of construction works (BS 5837)	Trimmed annually, outside bird nesting season (Sept–Feb only); maintained at a minimum height/density for screening	Annual visual inspection by managing agent
Wildflower / tussocky grass margins	Initial cut at 8–12 weeks post-sowing to control annual weeds; no further cut until after the following flowering season	Cut once per year (Sept/Oct) after seed-set; arisings removed within 1 week; invasive weeds spot-treated	Annual review of species diversity; managing agent; bare patches over-seeded as needed
Bird / bat boxes	Installed prior to the first bird nesting season following occupation	Inspected and cleaned annually (Sept–Jan, outside nesting/hibernation periods)	Landowner; licensed ecologist for bat box checks where required

9. Conclusion

- With the above mitigation, replacement and enhancement measures, the proposed development will:
 - retain the boundary hedgerow in full, avoiding the loss previously proposed;
 - replace removed frontage trees at a minimum 3:1 ratio, in accordance with PPW Edition 12;
 - provide 1.8m anti-climb security fencing set behind the retained hedgerow, minimising visual impact while meeting the site's security requirements;
 - establish mapped wildflower and tussocky grass margins with a defined native species mix;
 - deliver a long-term establishment and management plan covering all planting and habitat features;
 - maintain and enhance biodiversity value and support resilient ecological networks.
- Overall, the development will deliver net benefits for biodiversity while ensuring the industrial unit remains well-integrated within its landscaped surroundings, and directly addresses the matters raised by the Local Planning Authority.

Signed,

Richard Hughes (Agent)

Kirsty Williams (Applicant)