

# INTERNAL MEMORANDUM

**To:** Gareth Davies  
**From:** Matt Davies (Ecologist)  
**Ext:** 5278  
**Memo number:** 1  
**Date of previous memo:** -  
**Date:** 19/11/2025

**SUBJECT: P/25/0298 | Convert builders yard office to 2no. flats | Former Builders Yard Elwyn Drive Twynyrodyn Merthyr Tydfil CF47 0NJ**

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## *SITE DESCRIPTION*

A collection of buildings within a former builders yard close to “stepping stone” links (garden habitat, trees grassland) to the wider environment (parkland, woodland, scrub, grassland etc).

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## *DESIGNATED SITES WITHIN 500M OF THE APPLICATION SITE*

✓ Buglife B-Lines Area: c.375m from site

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## *PRIORITY AND PROTECTED SPECIES WITHIN 500M OF THE APPLICATION SITE*

- ✓ Birds (including Schedule 1<sup>1</sup> and Section 7<sup>2</sup> species);
- ✓ Invertebrates (including Section 7<sup>2</sup> species)
- ✓ Mammals
  - ✓ Bats (European protected species<sup>3</sup>; some Section 7<sup>2</sup> species) - closest roost record for unidentified pipistrelle species, c.420m from site);
  - ✓ Otter (European protected species<sup>3</sup>; Section 7<sup>2</sup> species);
  - ✓ Hedgehog (Section 7<sup>2</sup> species);
- ✓ Amphibians
  - ✓ Great crested newt (European protected species<sup>3</sup>; Section 7 species) - closest record c.942m from site);
- ✓ Vascular plants.

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## *REQUIREMENTS*

A Preliminary Roost Assessment (PRA) for bats and nesting birds of the onsite buildings (undertaken by a suitably qualified and experienced ecologist) is required. This must provide sufficient information for the local planning authority to assess any potential adverse impacts of the proposed development on priority and protected species and/or habitats, or to identify what further information is required before a full assessment is possible.

The results of the PRA will be used to inform whether further surveys are required, or to establish the need for and extent of any mitigation and compensation measures required as part of the proposed development.

A BARB+ data search required from SEWBRReC.

There will need to be enhancement of the site in line with the Environment (Wales) Act 2016.

Planning Policy Wales (PPW 12), Chapter 6 must be considered where relevant to this application.

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<sup>1</sup> Wildlife & Countryside Act 1981 (as amended)

<sup>2</sup> Environment (Wales) Act 2016

<sup>3</sup> Conservation of Habitats and Species Regulations 2017 (as amended)

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)