

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 3
Date of previous memo: 21/10/2024
Date: 12/11/2024

SUBJECT: P/24/0133 | Extension to existing hotel to provide additional bedrooms, together with alterations to the car park and associated works | Travel Inn Duffryn Road Pentrebach Merthyr Tydfil CF48 4BB

Documents submitted in support of this application:

1. Premier Inn Merthyr Tydfil, Duffryn, Pentrebach, Merthyr Tydfil, CF48 4BB. Preliminary Ecological Appraisal. Arbtech. **Issue 3.0. Dated 02/10/2024.**
2. Merthyr Tydfil Premier Inn. Green Infrastructure Statement. Walsingham Planning. **Dated September 2024.**
3. Premier Inn, Duffryn, Pentrebach, Merthyr Tydfil, CF48 4BB. Arboricultural Method Statement. Arbtech. Dated 30 April 2024.
4. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Proposed Context Plan. **Drawing Number: 6153-PL 003. Dated: 30/08/24. Prepared by Axiom Architects on behalf of Whitbread Group PLC.**
5. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Proposed Site Plan. **Drawing Number: 6153-PL 011. Revision C. Dated: 16/05/24. Prepared by Axiom Architects on behalf of Whitbread Group PLC.**
6. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Proposed Elevations. **Drawing Number: 6153-PL 210. Revision B. Dated: 16/05/24. Prepared by Axiom Architects on behalf of Whitbread Group PLC.**
7. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Proposed Elevations and Ecology Enhancements. **Drawing Number: 6153-PL 005. Dated: 16/05/24. Prepared by Axiom Architects on behalf of Whitbread Group PLC.**
8. Premier Inn Merthyr Tydfil, Duffryn, Pentrebach, Merthyr Tydfil, CF48 4BB. Ecological Mitigation, Enhancement and Management. Arbtech. **Issue 1.1. Dated 10/09/2024.**

COMMENTS / REQUIREMENTS

Document 1 (remaining comment from memo #2, 21/10/2024)

- Please can the SEWBRc unique reference number be added to Document 1 (NB this is a standard request for any submitted report that includes biodiversity data)?

Document 1 (remaining comment from memo #2, 21/10/2024 with additional comment)

- Document recommends x2 bat boxes (integrated design) to be incorporated into the new extension as enhancement measures. However, compensation is required for the PRF to be lost as a result of the removal of T8. A woodstone or woodcrete bat box will be added to a nearby

suitable tree. Please could this information be added to Document 1 **and Document 8**? The position and orientation of the box will be identified on a plan. This will then be used to help inform the Lighting Scheme.

Documents 4-7

- Documents 4 + 5 show identical information regarding the hedgehog house, hibernacula and insect boxes.

Documents 6 + 7 show identical information regarding bat boxes and bird boxes.

Document 8

- The language used within the document regarding the ecological measures will be amended throughout where required. Please use 'will' or 'must', rather than 'could' or 'should'.
- There is a range of ecological measures recommended within the document (see list below) – much of this is suggestive rather than definite (this ties in with the use of language as referred to above):
 - *Scrub, trees and flowering species should be retained, replacing with native species where possible. The planting of native tree and shrub species would be beneficial for wildlife, through the provision of sheltering and foraging habitats.*
 - *Planting of native scrub and grassland*
 - *Planting fruit bearing trees and species-rich grassland*
 - *Installation of gaps under new boundary fencing to enable hedgehogs to move freely through the site.*
 - *Sparrow terraces or swift cups are advised to be installed.*
 - *beetle banks, dead wood piles, floral borders, bee bricks*
 - *Areas of grass will be allowed to grow long around the edges*
 - *12 new trees will be planted across the developed site*

It needs to be established if all these measures are definite and will go into the scheme. This all needs to be firmed up within the document (see change of language above).

- Regarding the 12 replacement trees. Planning Policy Wales 12, 6.4.42, page 159 states:
*"... Where loss is unavoidable developers will be required to provide compensatory planting (which is proportionate to the proposed loss as identified through an assessment of green infrastructure value including biodiversity, landscape value and carbon capture). Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees **of a similar type and compensatory size planted for every 1 lost.**"*

Therefore, replacing the trees lost with "whips" will not be acceptable. The specimens must be at least of *standard* size. Please amend within the document.

- The hedgehog house, hibernacula, insect boxes, bird boxes and bat boxes have been marked on Documents 4-7.

All remaining ecological measures must also be marked on a clear plan, i.e., the measures in the list above.

- The spec of the insect boxes and hedgehog house will be changed to a more robust design for reasons of longevity, for example:
 - <https://www.greenandblue.co.uk/products/beepost> (x1), or
https://www.greenandblue.co.uk/products/beepot?pr_prod_strat=e5_desc&pr_rec_id=d002e624c&pr_rec_pid=2664094924900&pr_ref_pid=2664094826596&pr_seq=uniform (x3) – pot will be planted with native wildflowers of local (or at least Welsh/UK) provenance.
 - <https://www.nhbs.com/search?q=hedgehog>
- There are x2 references to the use of herbicides. This will not be acceptable and these references must be removed.
- All plans including mark-ups of ecological measures must be cross-referenced with Document 8.

CONDITIONS

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- No development shall take place (including ground works, vegetation clearance) until an internal and external Lighting Scheme has been submitted to and approved in writing by the local planning authority. The Lighting Scheme must conform to the latest guidance for wildlife-friendly lighting. The lighting plan will ensure the integrated bat boxes in the proposed extension will not be directly illuminated and that there will be dark routes to and from suitable habitat nearby.

NB other, existing, onsite lighting should be reviewed and changes to more wildlife friendly lighting (as per the latest ILP/BCT guidelines) implemented as an enhancement measure.

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- No development shall take place (including ground works, vegetation clearance) until a Construction Environmental Management Plan - Biodiversity (CEMP-B) has been submitted to and approved in writing by the local planning authority.

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- No development shall take place (including ground works, vegetation clearance) a Precautionary Working Method Statement (PWMS) with consideration for protected species, e.g., bats / reptiles / amphibians / hedgehog / nesting birds, has been submitted to and approved in writing by the Local Planning Authority. The approved PWMS shall be implemented in full according to the specified timescales, unless otherwise agreed in writing by the local planning authority.

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- No development shall take place (including ground works, vegetation clearance) until an INNS method statement has been submitted to and approved in writing by the local planning authority. This must include measures for Japanese knotweed, snowberry and cherry laurel.

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- Evidence required that ecological measures have been installed, created, implemented etc will be required post-development