

INTERNAL MEMORANDUM

To: Rebecca Owens
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 1
Date of previous memo: -
Date: 20/11/2025

**SUBJECT: P/23/0215 | Two storey and single storey extensions and creation of hardstanding
| 20 Plantation Square Troedyrhiw Merthyr Tydfil CF48 4HQ**

DOCUMENT SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1. 20 Plantation Square, Troedyrhiw, Merthyr Tydfil. Ecological Assessment 2025 prepared by BE Ecological Ltd. Issue 1VB. Dated: 12/11/25.

COMMENTS – Document 1 (Ecological Assessment)

- There is no desk study within the document.

Memo 1 (06/03/2025) clearly required a data search from SEWBRcC. UK Guidelines for Accessing and Using Biodiversity Data (CIEEM, March 2016) state that if a data search is not undertaken then this must be agreed with the LPA prior to preparing the survey report. A low impact or small-scale development is cited as a situation where a data search is not required, however, the guidance goes on to say that notwithstanding the small-scale or low impact of the development a data search may still be required on a case-by-case basis.

The case-by-case approach is important as, even on small sites, data searches can provide useful context required to help inform the possible impacts of a proposed development.

This site is a case in point. Having accessed the data, there are records of, for example, otter, hedgehog, Schedule 1 birds (e.g., crossbill). These species and types of species have not been directly considered within the PEA report.

It is for the Local Authority to decide whether a data search is required. Therefore, to avoid similar situations in the future, it would be useful if agreement (where a data search is not considered necessary by the applicant's ecologist) is sought with the LPA prior to submission of the report - especially if those instances where data has been specifically requested from the outset.

- 4.1 SUMMARY states:

A number of habitats were recorded across and adjacent to the survey area. These included:

- *cleared site with early successional vegetation*

This is incorrect – please amend.

- The number of trees proposed to be removed to facilitate the development needs to be defined.
- 4.5.2.1 Bats

The information here is confused, with missing text – please amend.

- External survey results states:

The survey undertaken by BE Ecological Ltd revealed a number of potential access points for bats, namely:

- *Small gaps via missing slates*
- *Small gaps beneath barge boards*

Were there any entry points elsewhere, e.g., open doors, broken windows in either the main building or the single-storey extensions?

- 4.5.2.6 Reptiles – this section outlines a reptile survey undertaken onsite, with small numbers of slow worms observed as set out within the results table. The very next comment concerned *'Impacts without mitigation'* and stated ... ***'No reptiles were identified throughout the survey'***.

Please can it be confirmed whether reptiles were found onsite and the report amended accordingly.

- 6 RECOMMENDATIONS – bat and bird boxes were suggested as enhancement measures to be erected 'on' the newly proposed buildings. These must be build-in models that will be integrated within the buildings. Please amend the text to reflect this.

REQUIREMENTS

An outline GIS and Landscape management plan setting out broad principles, with further information secured by planning condition – a detailed GIS, informed by a detailed long-term landscaping plan provided at the reserved matters stage.

The information that must be provided at the reserved matters stage is as shown below:

- GREEN INFRASTRUCTURE STATEMENT (GIS)

A detailed Green Infrastructure Statement (GIS) proportionate to the scale and nature of the development proposed must be submitted to and approved in writing by the local planning authority. The GIS must include, but not be limited to:

- A description of how green infrastructure has been incorporated into planning proposals;
- A demonstration of how the step-wise approach (the means of demonstrating the steps taken towards securing a Net Benefit for Biodiversity) has been applied;
- The highlighting and description of up-to date baseline data considered and up-to-date surveys and assessments undertaken, sustainable drainage statements, landscape and ecological management plans etc.
- Consideration of ecosystem resilience by using the DECCA (Diversity, Extent, Condition, Connectivity, Adaptability) framework.
- Cross referencing with other relevant ecological documents.

- LANDSCAPE/HABITAT, ESTABLISHMENT, MANAGEMENT, MAINTENANCE + MONITORING SCHEME

A detailed long-term (for the lifetime of the development) Landscaping, Habitat, Management, Maintenance + Monitoring Scheme must be submitted to and approved in writing by the local planning authority. The scheme must include, but not be limited to, the following:

- Details (including a plan/drawing) of the onsite retained landscaping/habitat/green infrastructure.
- Details including a plan/drawing) of the onside new landscaping/habitat/green infrastructure.

NB Replacement tree planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost. Where a woodland or a shelterbelt area is lost as part of a proposed scheme, the compensation planting must be at a scale, design and species mix reflective of that area lost. In such circumstances, the planting rate must be at a minimum of 1600 trees per hectare for broadleaves, and 2500 trees per hectare for conifers. Further details to be found in PPW12. NB replacement tree planting must be in the right place and not at the expense of other valuable and/or priority and protected habitats.

- A planting plan - NB all species will be native and of local (if not Welsh) provenance. The impacts of climate change must be taken into consideration).
- The immediate and long-term (for the lifetime of the development) establishment, maintenance and management measures for all [retained and new] onsite landscaping/habitat/green infrastructure.
- Timing, phasing and duration of construction activities and conservation measures.
- Monitoring post-development for all onsite landscaping/habitat/green infrastructure (both retained and new) and other ecological measures.
- A long-term (for the lifetime of the development) biosecurity risk assessment and management plan covering onsite areas.
- Cross referencing with other relevant ecological documents.
- Details of the funding mechanisms to meet the maintenance, management and monitoring objectives. NB the funding mechanism must anticipate and take account of costs rising over time.
- Details of the responsible person(s) / management company
- How a net benefit for biodiversity will be achieved within as short a time as possible and be locally responsive and relevant to local circumstances.
- Details of review periods and reporting of long-term (for the lifetime of the development) landscaping/habitat/green infrastructure management objectives.

○ LIGHTING SCHEME

An internal and external Lighting Scheme must be submitted to and approved in writing by the local planning authority. This will include, but not be limited to:

- The results of an onsite ambient light level survey for use as a baseline
- Both lux horizontal and lux vertical illuminance contour plans down to a lux level of 0.2 covering the site and the wider landholding
- Cross referencing of the contour plans with the presence onsite of protected species impacted by artificial light at night.
- Cross referencing with other relevant ecological documents.
- Details of colour temperature and model of lighting used.
- An environmental lighting impact assessment against conservation requirements for nocturnal and crepuscular species including details of when the lighting will be in operation (restrictions will be required)
- Details of lighting to be used both during construction and operation. The lighting shall be installed and retained as approved during construction and operation
- The survey and plans must be undertaken and produced by a competent lighting professional. The lighting plan must demonstrate dark zones at the boundaries and across/through the site. Any known roosts and wildlife boxes must not be illuminated (for example bat, bird, invertebrate) and there must be dark routes to allow barrier-free access to the boxes. The Lighting Scheme must conform to the latest guidance (see below) and any updates to these documents or further guidance regarding lighting that may be published subsequently.
 - Guidance Note GN08/23 Bats and Artificial Lighting At Night. Bat Conservation Trust and The Institute of Lighting Professionals 2023 - <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

- Good Practice Guidance: Planning for the Conservation and Enhancement of Dark Skies in Wales. <https://www.gov.wales/sites/default/files/publications/2025-02/dark-skies-guidance.pdf>

○ CEMP-B

A Construction Environmental Management Plan - Biodiversity (CEMP-B) must be submitted to and approved in writing by the local planning authority. The CEMP-B will include, but not be limited to the following:

- A risk assessment of potentially damaging construction-type activities
- Identification of “biodiversity protection zones” and areas where invasive species have been identified.
- Reference to details for implementation of method statements required to achieve specific biodiversity outcomes, and particularly mitigation measures.
- Identification of practical measures, both physical measures and sensitive working practices to avoid impacts during development, for protecting biodiversity through the control or regulation of construction-type activities.
- The location and timing of sensitive works to avoid harm to biodiversity features.
- The times during construction or development implementation when particular specialists need to be present on site to oversee works.
- Responsible persons and lines of communication.
- Funding
- Defining and communicating the role and responsibilities on site of an ecological clerk of works (ECoW), or appointed ecologist(s) responsible for managing biodiversity issues on site, and times and activities during construction or development implementation when they need to be present to oversee works.
- Use of exclusion fences, protective barriers and warning signs.

○ PRECAUTIONARY WORKING METHOD STATEMENT (PWMS)

A Precautionary Working Method Statement (PWMS) must be submitted to and approved in writing by the Local Planning Authority.

NB the PWMS will be based on the results of full and up-to-date survey work and will include, but not be limited to:

- Bats
- Nesting birds
- Amphibians
- Hedgehog
- Reptiles
- Invasive Non-Native Species

The approved PWMS shall be implemented in full according to the specified timescales, unless otherwise agreed in writing by the local planning authority.

- ENHANCEMENTS

Full details of biodiversity/ecological enhancements will be submitted to and approved in writing by the local planning authority. All must be clearly marked on relevant architectural plans, drawings and elevations.

- INVASIVE NON-NATIVE SPECIES (INNS)

A long-term (for the lifetime of the development) Invasive Non-Native Species (INNS) Method Strategy must be produced by an invasive species specialist and be submitted to and approved in writing by the local planning authority.

- COMPLIANCE

Evidence that ecological measures have been installed, created, implemented etc will be required on completion of the development. This evidence must be submitted to and approved in writing by the local planning authority.