

INTERNAL MEMORANDUM

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

Memo number: 2
Date of previous memo: 30/01/2025
Date: 28/02/2025

SUBJECT: P/25/0021 | Demolition of the existing buildings (No. 34-37 High Street) and construction of new public open space to provide a link between the train station and the High Street, with associated landscaping and access works. | Land At 34-37 High Street Merthyr Tydfil CF47 8Deare

DOCUMENTS SUBMITTED

1. Merthyr Interchange Link. Stage 3 Report Appendix Document. MIL-ESA-XX-XX-RP-A-000013 *prepared by* ESA Architects *on behalf of* Merthyr Tydfil County Borough Council. Revision P01 First Issue. Issue Date: 05/12/2024. In x10 parts.
2. Merthyr Interchange Link. Green Infrastructure Statement. 2025UK374148 – MIL-ESA-XX-XX-RP-A-000221 *prepared by* ESA Architects *on behalf of* Merthyr Tydfil County Borough Council. Revision P01 First Issue. Issue Date: 20/02/2025.
3. Merthyr Tydfil Interchange Link. Street and Public Realm Lighting. Drawing Identifier: 70120884-RED-61-XX-DR-E-0117. Revision P03 *prepared by* Redstart. Dated: 27/02/2025.
4. 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.
5. 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.

Landscaping

Document 1, Part 9 (of 10) – Soft Landscaping Layout (MIL-ESA-XX-XX-DR-A-940001_P01 Dated: 19/08/2024). All species need to be native and of local (if not Welsh or UK) provenance. There are currently several non-native species and cultivars included - these species need to be replaced within the scheme. Of particular note is the inclusion of Japanese rose, *Rosa rugosa* ‘alba’ – *Rosa rugosa* is an Invasive Non-Native Species (INNS) and is included on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). It is an offence to release Species listed on Schedule 9 into the wild.

The proposed trees and hedgerow require a wider range of species to be included in order to increase biodiversity and improve resilience.

x5 trees are proposed – all *Betula pendula* – please amend to include five different native species trees of local (if not Welsh) provenance.

x1 species (*Fagus sylvatica*) is proposed for the hedgerow – please amend to include at least five species of native species suitable for a hedgerow of local (if not Welsh) provenance.

The following changes are also required in relation to grass/wildflower seed mixes:

Proposed:

Change to:

Barenbrug – Tough Turf	<i>Emorsgate EL1 – Flowering Lawn Mixture (contains slow growing grasses with a selection of wildflowers that respond well to regular mowing)</i>
Barenbrug – Wildflowers – Classic Hay Meadow	<i>Barenbrug – Wildflowers – Bees & Butterflies</i>

Mitigation

Document C includes mitigation for a colony of sand martins identified as nesting within the train station retaining wall. Question: does this development impact the train station retaining wall?

Enhancement

Document B contains the following enhancement recommendation:

“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 C contains the following enhancement recommendations:

“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>.”

All of the above measures must be considered and included within this application.

NB the bird boxes as listed above are framed as enhancement measures within Document C, 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.

Architect plans mark-up

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

Planning Policy Wales 12 (PPW 12)

PPW12, Chapter 6 should be considered where relevant to this application.

The main elements of the policy (that are 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.*

For further information, see here - [Planning Policy Wales - Edition 12 \(gov.wales\)](https://gov.wales/planning-policy-wales-edition-12)

A Green Infrastructure Statement (GIS) has now been submitted (Document 2). This is largely acceptable, however, it references Planning Policy Wales (PPW) 11 rather than PPW 12. Please can this be amended?

A long-term (at least 25 years, but more appropriately for the lifetime of the development) habitat management, maintenance and monitoring plan is required prior to determination. This must include details of the management funding mechanism.