

INTERNAL MEMORANDUM

To: Kate Glover
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 2
Date of previous memo: 27/11/2025
Date: 24/03/2026

SUBJECT: P/25/0312 | Demolish existing units and construct five new units and associated parking | Old Saw Mill Court Street Merthyr Tydfil CF47 8DU

PREVIOUS COMMENT FROM MEMO #1 (27/11/2025)

A Preliminary Roost Assessment (PRA) for bats and nesting birds of the site (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 SEWBrEC.

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.

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 \(gov.wales\)](#)

DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1. The Old Sawmill, Court Street, Merthyr Tydfil. Initial Bat Inspection Survey, Issue 1, Version A prepared by BE Ecological Ltd. Dated: 05/03/2026

COMMENTS

Document 1:

The survey report states that the suitability of the building is between low and negligible. However, it must be categorised as one or the other. If there any suitable bat roosting features present (which it seems there are) then the suitability cannot be negligible and must be low. Therefore, a single bat survey must be undertaken.

General:

The other comments from memo #1 are still relevant (see above).