

INTERNAL MEMORANDUM

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

Memo number: 3

Date of previous memo: 24/03/2025

Date: 18/06/2026

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 SEWBRcC.

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

Document 1:

- In terms of the version number and date, Document 1 has not been updated. Please can this information be amended?
- The Executive Summary has not been updated. Please can the information be amended to reflect the information within the body of the report?
- The works should not be undertaken within the bat hibernation season. Please can the report be amended to reflect this?
- The proposed bat box is acceptable, however, the wording in the report states that it will be attached to the north-eastern elevation of the building. Is this an existing, retained elevation or is it proposed to be a new elevation?
- The bat box and bird box must be clearly marked on all relevant architect plans, drawings and/or elevations.
- A lighting scheme is required to be submitted to and approved in writing by the local planning authority. The lighting plan must demonstrate dark zones at the boundaries. Wildlife boxes must not be illuminated (bat and bird) and there must be dark routes to allow barrier-free access to the boxes. NB It is important that the arches to the north-east of the site remain unilluminated. The Lighting Scheme must conform to the latest guidance:
 - Guidance Note GN08/23 Bats and Artificial Lighting At Night. Bat Conservation Trust and The Institute of Lighting Professionals 2023 - <https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/>
 - Good Practice Guidance: Planning for the Conservation and Enhancement of Darks Skies in Wales - <https://www.gov.wales/sites/default/files/publications/2025-02/dark-skies-guidance.pdf>

As per the principles set out in Good Practice Guidance: Planning for the Conservation and Enhancement of Darks Skies in Wales (light must only be used where and when necessary. Therefore, lighting should be controlled by switch off, dimming or PIR sensors. There is no reason lights should remain on continuously from dusk until dawn.

General:

The other comments from memo #1 regarding PPW12, Chapter 6 (e.g., GIS and long-term habitat management plan) are still relevant and required (see above).