

INTERNAL MEMORANDUM

To: Rebecca Owens
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 2
Date of previous memo: 05/06/2025
Date: 18/08/2025

SUBJECT: P/25/0159 | Erection of 2 no. detached dwellings | Land To The South Of Canal Side House Pleasant View Aberfan

DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1. Land to The South of Canal Side House, Pleasant View, Aberfan. Preliminary Ecological Appraisal prepared by BE Ecological Ltd. Issue 1. Revision VA. Dated: 25/07/2025.
2. Land to the South of Cabal [sic] Side House. Green Infrastructure Assessment. **NB there are no details of authorship, no document version number and no date. This information is required.**
3. Proposed Dwellings, Land to the South of Canal Side House, Pleasant View, Aberfan, CF48 4PQ. Landscape Planting & Maintenance Schedule, *prepared by* K. J. Lloyd AA Dip. RIBA Chartered Architect. Date: May 2025.
4. Proposed Dwellings, Land to the South of Canal Side House, Pleasant View, Aberfan, CF48 4PQ. Drawing: Proposed Elevations¹. Drawing number: SL.01, *prepared by* K. J. Lloyd AA Dip. RIBA Chartered Architect. Date: May 2025.

COMMENTS: [Document 1](#)

1.3 SITE DESCRIPTION – “The site has been cleared”

Historic aerial imagery shows the site was covered with scrub, trees and bracken.

Relevant excerpts from PPW12:

*“Potential applicants should not conduct any pre-emptive site clearance works before submitting a planning application as this can make it more difficult for a development proposal to secure a net benefit for biodiversity. **Where a site has been cleared prior to development its biodiversity value should be deemed to have been as it was before any site investigations or clearance took place. A net benefit for biodiversity must be achieved from that point.** Habitat status can be established through evidence remaining on site and local desk-based assessments (planning authorities must ensure that they have access to these data sources). In such cases, habitat status will be presumed to be good in the absence of any evidence to the contrary.”*

*“Permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits. Where individual or groups of trees and hedgerows are removed as part of a proposed scheme, planning authorities must first follow the step-wise approach as set out in paragraph 6.4.15. 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 139 Further advice in relation to ancient woodland is available on NRW’s website. 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***

¹ NB this is an overhead plan rather than an elevations drawing.

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. The planting position for each replacement tree shall be fit to support its establishment and health and ensure its unconstrained long-term growth to optimise the environmental and ecological benefits it affords."

There is no reference to these parts of PPW12 within Document 1, which are pertinent to this site.

In addition, the removed habitat will have been important in terms of connectivity within the north-south green corridor. This is an important consideration which has not been explored within Document 1.

1.5 STUDY AREA – “The field survey looked at the red line development area itself and up to 20m from the site boundaries wherever possible.”

4.5.1.1 Early successional vegetation/bare ground, Phase 1 habitat survey map

The map does not show the 20m buffer around the boundary or set the site in the context of the nearby housing (this may be relevant, for example, if the adjacent housing suitability for roosting bats).

2.5 CONSTRAINTS – “The survey was undertaken at a time of year outside of the main season and as such, the full botanical diversity may not have been apparent.”

4.2 BACKGROUND – “The survey was undertaken on **1st July 2025**.”

Please amend the statement within part 2.5.

6 RECOMMENDATIONS, Reptile – “A reptile presence or likely absence survey is required.”

This must be undertaken pre-determination.

6 RECOMMENDATIONS, Invertebrates – “A check for devils bit scabious should be undertaken during the further recommended botany surveys.”

Have further botany surveys been recommended? No other reference to this in the document.

7 REFERENCES – BCT/ILP lighting guidelines reference is out of date. Similarly, the reference to the guidelines for PEA

COMMENTS: *Document 2*, *Document 3* and *Document 4*

3.00 EXISTING GREEN INFRASTRUCTURE – “The site currently has no green infrastructure at all.”

This is incorrect – [Document 1](#) describes the current onsite habitat. Please also refer to the excerpts from and comments regarding PPW12 above.

NB there are no details of authorship, no document version number and no date. This information is required.

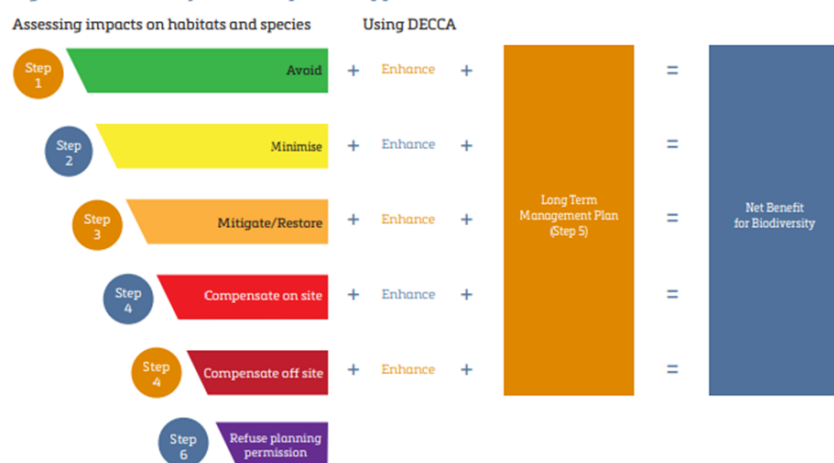
It is recommended that the document is written by a suitably qualified person (e.g., an ecologist or a landscape architect).

PPW 12 states that a GIS should be submitted with all planning applications that:

- will describe how green infrastructure has been incorporated into planning proposals;
- must be used for demonstrating how the step-wise approach has been applied;
- should highlight baseline data² considered and surveys and assessments undertaken, sustainable drainage statements, landscape and ecological management plans etc.
- will consider ecosystem resilience by using the DECCA (Diversity, Extent, Condition, Connectivity, Adaptability) framework.

In addition, the policy indicates that the step-wise approach is the means of demonstrating the steps taken towards securing a net benefit for biodiversity. The onus is on developers to bring forward proposals in a way that will achieve a net benefit for biodiversity (from the baseline¹) demonstrating how they have used the step-wise approach.

Figure 12: Summary of the Step-Wise Approach



The GIS ([Document 2](#)) as submitted is not acceptable and does not demonstrate that there will be a Net Benefit for Biodiversity,

NB each stage of the step-wise approach must be accompanied by a long-term management plan. The management plan should set out:

- Details of newly proposed landscaping/habitat/green infrastructure;
- A planting plan. NB all species will be native and of local (if not Welsh) provenance;
- The immediate and long term (for a scheme of this scale – in perpetuity or at least 25 years) maintenance and management measures for all onsite landscaping/habitat/green infrastructure (both retained and new).
- Details of any other ecological measures if relevant, e.g., bat boxes, bird boxes, hibernacula, etc;
- Monitoring post-development for all onsite landscaping/habitat/green infrastructure/ and other ecological measures;
- Details of the funding mechanisms to meet the maintenance, management and monitoring objectives plus details of those responsible. NB the funding mechanism must anticipate and take account of costs rising over time;
- 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.

² Baseline: "Where a site has been cleared prior to development its biodiversity value should be deemed to have been as it was before any site investigations or clearance took place. A net benefit for biodiversity must be achieved from that point." – PPW12.

Document 3 does not include any of the above information. This required.

NB bat and bird boxes must be integrated into the newly proposed buildings and clearly marked on all architect plans, drawings and elevations.

Document 4 has some detail regarding the planting. Amendments would be required for consideration and bearing in mind the information regarding the GIS and the long-term management plan. Non-native and cultivars are included in **Document 4**, however, all species must be appropriate, native and of local (if not Welsh or UK) provenance. This includes the grassed areas. The document includes a reference to Buddleia – this is invasive and must not be used. There is a reference to new hedgerows, with the instruction “see specification”. The specification is not included and is required for consideration.

Possible Conditions required

LIGHTING SCHEME

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 plan must demonstrate dark zones at the boundaries and across the site. Wildlife boxes must not be illuminated (bat, bird) and there must be dark routes to allow barrier-free access to the boxes. 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://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>

PRECAUTIONARY WORKING METHOD STATEMENT (PWMS)

No development shall take place (including ground works, vegetation clearance) until a Precautionary Working Method Statement (PWMS) for [bats / great crested newt / common dormouse / reptiles / amphibians / hedgehog / badger / 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.

ECOLOGICAL ENHANCEMENT

No development shall take place (including ground works, vegetation clearance) until details of biodiversity/ecological enhancements have been submitted to and approved in writing by the local planning authority. The development shall then be carried out in accordance with the approved details and maintained as such in perpetuity.