

INTERNAL MEMORANDUM

To	Gareth Davies
From	Matt Davies
Memo #	1
Date	21/09/2026
Previous memo date	-
Application:	P/26/0205 The erection of a convenience store (Class A1) with associated parking, landscaping, and replacement parking provision to serve the adjacent social club. Land Adjacent To Penydarren Social Club Alexandra Avenue Tramroad Lane Penydarren Merthyr Tydfil CF47 9AF

SITE DESCRIPTION

Social club building with associated car park. Adjacent to areas of scrub and trees that stretch around the existing building to the west, south and east. The onsite scrub and trees is a relatively large section of stepping stone habitat in the local context, connecting up other areas of habitat in the surrounding area (albeit somewhat fragmented by roads).

PROPOSED WORKS AND POTENTIAL IMPACTS

Proposed works	Works likely to impact protected species (if present)
The erection of a convenience store (Class A1) with associated parking, landscaping, and replacement parking provision to serve the adjacent social club. NB this would involve demolition of a small single storey building and removal of an area of tree and scrub habitat.	Yes, bats, birds, invertebrates.

DESIGNATED SITES WITHIN 1000M OF THE APPLICATION SITE

✓ Sites of Importance for Nature Conservation (SINC)	2x, closest, Cyfarthfa Park (8c.54m)
✓ Restored Ancient Woodland Site (RAWS)	1x
✓ Within a Buglife B-Lines Area	

PRIORITY AND PROTECTED SPECIES WITHIN 500M OF THE APPLICATION SITE

<i>Species / Species Group</i>	<i>Closest record(s)</i>
✓ Birds (including Schedule 1 ¹ and Section 7 ² species);	Swift (c.132m)
✓ Invertebrates (including Section 7 ² species)	Dingy skipper (c.249m)
✓ Mammals	
✓ Bats (European protected species ³ + some Section 7 ² species);	Closest record - Common pipistrelle (c.201m)

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

³ Conservation of Habitats and Species Regulations 2017 (as amended)

	Closest roost record - Unidentified bat species (c.522m)
✓ Otter (European protected species ³ + Section 7 ² species);	(c.917m)
✓ Hedgehog (Section 7 ² species);	(c.212m)
✓ Amphibians	
✓ Great crested newt (European protected species ³ + Section 7 species);	(c.829m)
✓ Common toad (Section 7 ² species);	(c.314m)

DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1	Penydarren Social Club, Tramroad Lane, Penydarren, Merthyr Tydfil, CF479AD. Phase 1 Habitat Survey report <i>prepared by</i> Alder Ecology UK Ltd. Dated: 09/07/2026.
2	Pen y Darren Social Club. Landscape & Biodiversity Enhancement Plan & GI Statement, Drawing number: 699.01, Revision A <i>prepared by</i> Catherine Etchell Associates, Dated: July 2026.
3	Pendarren Social Club. Arboricultural Report Including: Tree Survey Data & Tree Constraints Plan, Arboricultural Impact Assessment, Tree Protection Plan and Arboricultural Method Statement <i>prepared by</i> ArbTS - Arboricultural Technician Services Ltd. Project Reference – ArbTS_2451.1_Pendarren Social Club. Dated: 16/07/2026

REQUIREMENTS AND COMMENTS

Document 1

- i. There is no information or evidence regarding negligible potential suitability for the main onsite building (the social club) or the utility building - there is simply a statement that they have negligible value. More detail and justification is required. Why do they not have low potential suitability?

Also, page 18 states that the social club will not be impacted by the proposed works, however the introduction of additional lighting over and above any already existing may produce an impact on any roosts or nests that may be present.

- ii. Page 19 refers to potential for foraging bats but does not consider flight lines. This needs to be added. The onsite habitat has low potential suitability as a bat flight-path and foraging habitat.
- iii. Page 21 - no protected habitats within 5km. Is this correct? Page 13 – Table 1, first row - Cwm Glo a Glyndryys SSSI – 1.3km from the site.

Document 2

- i. Some of the steps (1-4) of the Stepwise Approach are listed but not explored in the context of the site. This is required.
- ii. Step 5 is a Long-Term Management Plan, which must accompany the GIS and is required *pre-determination* to demonstrate a Net Benefit for Biodiversity – see full details of that requirement below:

A long-term* Landscaping, Habitat and Ecology Scheme (LHES), which should include, but not be limited to:

**Management will continue for a minimum period of 25 years and thereafter for as long as the approved development remains in existence.*

- Details (including a plan/drawing) of both the retained and new landscaping/habitat/green infrastructure.
 - A planting plan - NB all proposed species will be native only and of local (if not Welsh) provenance. NB any trees removed will need to be replaced. As per PPW12, 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 a similar type and compensatory size planted for every one lost. The number of trees being removed will need to be quantified.
 - Long term establishment, maintenance and management measures for all onsite landscaping/habitat/green infrastructure (both retained and new).
 - Full details of other ecological measures, e.g., bat boxes, bird boxes, hibernacula, gaps in boundaries for hedgehogs etc. This must include proposed models and hyperlinks to specifications. All boxes must be clearly labelled on architect plans, drawings and elevations.
 - Monitoring post-development for all onsite landscaping/habitat/green infrastructure and other ecological measures.
 - Details of 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 the funding mechanisms to meet the maintenance, management and monitoring objectives including details of the responsible person or company. NB the funding mechanism would need to consider rising costs over time.
- iii. The document implies that a contiguous green infrastructure will be completed around the site, but it is unclear exactly what this means – as there is already existing GI around the site.
- iv. On the plan, at the southeast ‘corner’ of the site, there is an area of habitat outside of the redline boundary that is labelled ‘*existing trees and scrub removed*’. In Document 3 on the Tree Protection Plan, the trees in this exact same area (within S1) are labelled as within a Construction Exclusion Zone. Clarification is required regarding the proposal for the habitat in this area. There will need to be a continuous tree and or hedge around the site to provide the same connectivity as currently present.
- v. Immediately to the west of the proposed unit is a group of trees (G2), The plan (Document 2) does not appear to show an impact. However, in Document 3 on the Tree Protection Plan, the removal of the 7 easternmost trees, closest to the unit is proposed. Again, clarification is required regarding the proposal for the habitat in this area.
- vi. Part of the red line boundary is to cover the proposed new totem sign – what habitat will need to be disrupted to facilitate this?

Document 3

See point v. above in relation to Document 2.

Lighting

A Lighting Scheme is required. This will include, but not be limited to:

- Horizontal and lux vertical illuminance contour plans down to a lux level of 0.2lux
- Details of colour temperature and model of lighting used. Links to the data sheets for the luminaires must be provided. Colour temperature must be 2700K or lower.
- 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. 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.

- A. 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/>
- B. 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 Document B: 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.

The Lighting Scheme must be submitted *pre-determination* to iron out any issues regarding positioning of wildlife boxes and lighting. The positions of wildlife boxes cannot be agreed without information regarding lighting.