

INTERNAL MEMORANDUM

To: Gareth Davies
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1
Date of previous memo: -
Date: 14/11/2025

SUBJECT: P/25/0274 | Siting of mobile home to accommodate an agricultural worker | Penbwlcha Farm Twynygarreg Treharris CF46 5RN

SITE DESCRIPTION

Site is situated adjacent to valuable habitat, which is well-connected. This includes scattered trees, scrub, agricultural fields, hedgerows, woodland, forestry.

DESIGNATED SITES WITHIN 500M OF THE APPLICATION SITE

- ✓ Sites of Importance for Nature Conservation (SINC): x2 [**closest, c.58m St Tydfil Forest (East)**];
- ✓ Ancient Semi Natural Woodland (ASNW): x11;
- ✓ Restored Ancient Woodland Site (RAWS): x1;
- ✓ Plantation on Ancient Woodland Site (PAWS): x5;
- ✓ Ancient Woodland Site of Unknown Category (AWSUC): x1;
- ✓ NRW Priority Area (Woodland – PAWS): x5.

PRIORITY AND PROTECTED SPECIES WITHIN 500M OF THE APPLICATION SITE

- ✓ Birds (including Schedule 1¹ and Section 7² species);
- ✓ Invertebrates (including Section 7² species)
- ✓ Lichens (including Section 7² species);
- ✓ Mammals
 - ✓ Bats (European protected species³; some Section 7² species) - closest roost record for brown long-eared bat, c.580m from site);
 - ✓ Otter (European protected species³; Section 7² species);
 - ✓ Hedgehog (Section 7² species);
- ✓ Reptiles (Section 7² species);
- ✓ Amphibians
 - ✓ Common toad (Section 7² species);
- ✓ Vascular plants (including Section 7² species).

REQUIREMENTS

No ecological survey work will be required as the planning case officer has confirmed that the site has been cleared prior to the development and to planning permission being granted.

Planning Policy Wales 12 (PPW12) addresses this scenario (see excerpt below):

“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

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

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

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.”

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.*

A Green Infrastructure Statement (GIS) and a long-term landscape and habitat management plan is required. The baseline should be deemed to have been as it was before any site investigations or clearance took place when assessing and producing a Net Benefit for Biodiversity (NBB).

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