

INTERNAL MEMORANDUM

To	Gareth Davies
From	Matt Davies
Memo #	2
Date	06/10/2026
Previous memo date	14/09/2026
Application:	P/26/0197 Construction of four detached houses and new access road Rear Of Six Bells Heolgerrig Merthyr Tydfil CF48 1RP

DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1	Land Adjacent to Six Bells Estate, Heolgerrig, Cyfarthfa, Merthyr Tydfil, CBC CF48 1TU. A Preliminary Ecological Appraisal (PEA), Report Reference: LT410, Version 1 <i>produced by</i> Little Wing Ecology CYF <i>on behalf of</i> Callum Tranter. Dated: 28/04/2026.
2	Arboricultural Impact Assessment for Land Adjacent to Six Bells Estate, Heolgerrig, Merthyr Tydfil prepared by Treescene. Dated 17th July 2026
3	and Adjacent to Six Bells Estate. Proposed Tree Removal Plan, 1163.06 Revision B, <i>submitted by</i> George and Co. dated 30/06/2026

REQUIREMENTS AND COMMENTS

Further survey work and Document 1	The survey work recommended in Document 1 (with some additions) must be undertaken prior to determination of the application: - Bat dusk emergence surveys for Buildings A and B – in line with the latest good practice guidelines [Collins, J. (Ed.) (2023). <i>Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)</i>. The Bat Conservation Trust, London.] NB NVAs will be used and there will need to be <i>an automated/static bat detector survey undertaken of the loft space of Building A</i>. - A Ground Level Tree Assessment (GLTA) of onsite trees to inform further possible tree surveys. This must include any trees impacted or removed to facilitate the development as well as any trees removed or modified for arboricultural reasons. NB even some relatively minor works to trees involving pruning have the potential to impact roosting bats and nesting birds. - An automated/static detector survey of the woodland. <i>This will need to be accompanied by a Night-time Bat Walkover (NBW) survey of the site.</i> The PEA report (Document 1) can then be upgraded to an Ecological Impact Assessment, which must be submitted for assessment. Document 1 must also justify the decision not to recommend any further surveys for nesting birds, reptiles, GCN, invertebrates etc. Could the commissioned ecologist consider onsite lichen communities and grassland fungi and add some information and comments to Document 1.
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	Has the commissioned ecologist been given the up-to-date plans for the development to ensure that have properly considered all the impacts and made fully informed recommendations in their report. If not, can this be done? Question: could there be a re-design of the scheme with access instead gained from the west – this might avoid/reduce some of the ecological impacts?
Documents 2 and 3	Document 3 seems inconsistent with the Document 2 (AIA) in terms of Trees to be removed. As an example, T2 is marked for removal in Document 2, but not Document 3. Document 2 acknowledges the impacts on the onsite trees. Some will be removed; some will be pruned with the remaining protected. The site-specific Tree Protection Plan (TPP) and Arboricultural Method Statement (AMS) as referred to will be needed to reinforce the mitigation needed. There seem to be some inconsistencies in the information (at least between the two documents reviewed above). Document 2 includes advice regarding replacement tree planting. The Arboriculturalists should be approached to flesh this out with some more detailed recommendations. NB this is also an ecological consideration and 3:1 replacement of removed trees will be required as per PPW12. NB T36 is only recommended for removal for arboricultural reasons and not to facilitate the development. This tree should therefore remain in place. If it is to be removed it will need to be included in the ongoing ecological assessments.
Lighting	A detailed Lighting Scheme is required. This will include, but not be limited to: • The results of an onsite ambient light level survey for use as a baseline. • Both lux horizontal and lux vertical illuminance contour plans down to a lux level of 0.2 covering the site and the wider landholding. This will be required for the ambient light level survey and the proposed post-development lighting set-up. • Details of colour temperature (must be 2700K or lower) and model of lighting used. • Details of lighting to be used both during construction and operation. The lighting shall be installed and retained as approved during construction and operation. • A Central Management System (CMS) should be used to produce light only when and where needed. • An environmental lighting impact assessment against conservation requirements for nocturnal and crepuscular species including details of when the lighting will be in operation (restrictions will be required). The above survey and plans must be undertaken and produced by a competent lighting professional in collaboration with the commissioned ecologist. The lighting plan must demonstrate dark zones at the boundaries and across/through the site. Known roosts and proposed 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 and access to foraging and commuting routes. 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. • 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 Darks Skies in Wales. https://www.gov.wales/sites/default/files/publications/2025-02/dark-skies-guidance.pdf
Pre-emptive clearance	Looking at historical aerial imagery, there may have been some tree removal between about 2018 and 2020 in the centre of the site (this may explain the log pile – target-noted on the PEA plan). There is a need to consider whether this constitutes pre-emptive clearance if the site is still within the same ownership. Planning Policy Wales 12 (page 151) states the following: <i>“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 [NBB] 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.”</i>
CEMP-B	A Construction Environmental Management Plan - Biodiversity (CEMP-B) is required for approval in writing by the local planning authority. The CEMP-B will include, but not be limited to the following: • A risk assessment of potentially damaging construction-type activities • Identification of “biodiversity protection zones”, “root protection zones” and areas where invasive species have been identified. • Identification of practical measures, both physical measures and sensitive working practices to avoid impacts during development, for protecting biodiversity through the control or regulation of construction-type activities. • The location and timing of sensitive works to avoid harm to biodiversity features. • Responsible persons and lines of communication. • Defining and communicating the role and responsibilities on site of an ecological clerk of works (ECoW), or appointed ecologist(s) responsible for managing biodiversity issues on site, and times and activities during construction or development implementation when they need to be present to oversee works. • Use of exclusion fences, protective barriers and warning signs.

Enhancement	There will need to be enhancement of the site in line with the Environment (Wales) Act 2016. Details of biodiversity/ecological enhancements must be 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.
Planning Policy Wales 12 (Chapter 6)	The main elements of the policy (that are or may be relevant to this application) are as follows: ○ <i>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.</i> ○ <i>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.</i> ○ <i>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</i> ○ <i>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.</i> For further information, see below and here - Planning Policy Wales - Edition 12 (gov.wales)
Green Infrastructure Statement (GIS)	The GIS must include, but not be limited to, the following: ● A description of how green infrastructure has been incorporated into planning proposals; ● A demonstration of how the step-wise approach (the means of demonstrating the steps taken towards securing a Net Benefit for Biodiversity) has been applied; ● The highlighting and description of up-to date baseline data considered and up-to-date surveys and assessments undertaken, sustainable drainage statements, landscape and ecological management plans etc. ● Consideration of ecosystem resilience by using the DECCA (Diversity, Extent, Condition, Connectivity, Adaptability) framework.

Long-term Landscaping, Habitat & Ecology Scheme (LHES)	A Long-term¹ Landscaping, Habitat & Ecology Scheme (LHES) is required. The LHES must include, but not be limited to, the following: • Details (including a plan/drawing) of both the retained and new landscaping/habitat/green infrastructure. NB • A planting plan - NB all species will be native 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 tree lost. • Long term establishment, maintenance and management measures for all onsite landscaping/habitat/green infrastructure (both retained and new). • Details of other ecological measures, e.g., bat boxes, bird boxes, hibernacula, gaps in boundaries for hedgehogs etc. • 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 must anticipate and take account of costs rising over time.
Compliance	Evidence that ecological measures have been installed, created, implemented etc will be required on completion of the development. This evidence must be submitted to and approved in writing by the local planning authority.
General	Point of note - OS mapping from 1900s shows the presence of an Air Shaft onsite – see map overleaf.

¹ for a minimum period of 25 years and thereafter for as long as the approved development remains in existence.

