

INTERNAL MEMORANDUM

To	Kate Glover
From	Matt Davies
Memo #	1
Date	13/08/2026
Previous memo date	-
Application:	P/26/0177 Installation of solar photovoltaic car ports over part of the existing Abermorlais car park. Car Park Rear Of Civic Centre Glebeland Place Merthyr Tydfil CF47 8BH

SITE DESCRIPTION

Abermorlais car park, north of the Civic Centre. Adjacent to areas of amenity grassland, woodland pockets and wooded stream habitat. Close to River Taff.

DESIGNATED SITES WITHIN 500M OF THE APPLICATION SITE

- | | |
|--|--------------------------------|
| ✓ Sites of Importance for Nature Conservation (SINC) | 1x – Afon Taf, c.67m from site |
| ✓ Within a Buglife B-Lines Area | |

PRIORITY AND PROTECTED SPECIES WITHIN 500M OF THE APPLICATION SITE

✓ Birds (including Schedule 1 ¹ and Section 7 ² species);	Species include – Kingfisher, Grey wagtail, Herring gull, House sparrow, Grey heron, House martin. Lesser black-backed gull, Greater black-backed gull, Swift
✓ Fish (including Section 7 ² species);	Brown / Sea Trout
✓ Invertebrates (including Section 7 ² species)	Species include – Pearl-bordered fritillary, Small blue, Hedge rustic
✓ Marsh fritillary butterfly (Section 7 ² species),	Closest record c.1138m
✓ Mammals	
✓ Bats (European protected species ³ + some Section 7 ² species);	Closest record for Common pipistrelle c.45m Closest <i>roost</i> record for Unidentified bat species c.267m
✓ Otter (European protected species ³ + Section 7 ² species);	Closest record c.163m
✓ Hedgehog (Section 7 ² species);	Closest record c.285m
✓ Amphibians	
✓ Great crested newt (European protected species ³ + Section 7 species);	Closest record c.267m

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

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

DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION

1	Solar PV Carports, Abermorlais Car Park, Merthyr Tydfil. Design and Access Statement, Version 02. <i>Prepared by Renewables First on behalf of Merthyr Tydfil County Borough Council.</i> Dated: 02/08/2026.
2	Abermorlais Car Park, Merthyr Tydfil. Glint and Glare Assessment, Version 01. <i>Prepared by Renewables First on behalf of Merthyr Tydfil County Borough Council.</i> Dated: 20/04/2026.
3	Solar PV module datasheet. Date received: 07/08/2026.

REQUIREMENTS AND COMMENTS

Considerations + survey work	Extract from previous Pre-App comments shown in italics below: <i>An ecologist should be commissioned to undertake pre- and post-development aquatic invertebrate surveys of the closest area of the river to the site. The ecologist should also look at the available evidence and provide a comprehensive mitigation and compensation plan for the possible impacts of the panels on invertebrates.</i> <i>This might include:</i> <i>Solar panel mitigation and avoidance measures</i> <i>Use anti-reflective or low-polarisation coatings</i> <i>Use white gridding</i> <i>Maintain adequate buffer zones</i> <i>Adjust setback distances from riverbank – could the westernmost series of panels be re-positioned over the car parking spaces at the east of the site to increase the distance of the solar panels from the river?</i> <i>Protect and enhance riparian vegetation</i> <i>Enhance the nearby river habitats with diverse planting (grasses, sedges, emergent plants), by adding woody debris or artificial substrates (e.g. partially submerged stones) to provide, natural egg-laying substrates and stable microclimates. NB many species require specific structures for egg attachment.</i> <i>Monitoring</i> <i>Pre- and post-construction macroinvertebrate surveys</i>
Comments regarding submitted documents in relation to considerations above	<i>Document 1</i> A conclusion has been drawn within the document regarding the impacts on aquatic invertebrates. What evidence has been used to come to this conclusion? Has an ecologist specialising in aquatic invertebrates been involved in the assessment? Has a pre-development aquatic invertebrate surveys of the closest area of the river to the site been undertaken? The document states that the proposed PV modules incorporate anti-reflective glass and that this is confirmed by the manufacturer's technical specification (Document 3). Can the information in Document 3 regarding the anti-reflective coating please be highlighted? NB Document 2 does not include any information regarding anti-reflective coatings. As stated in the previous Pre-App comments – the use of white, non-polarising gridding is the other measure that could mitigate impacts. Research indicates

		that this type of gridding can be used to disguise the evolutionary trap posed by PV panels in relation to egg-laying (e.g., Black & Robertson, 2020). Do the proposed PV modules have this type of gridding? Has the re-positioning of the panels been considered as a further mitigation? Protection and enhancement measures in relation to the nearby riparian vegetation will be required. Document 2 briefly outlines a proposed ecological enhancement “... <i>a ground-level rain garden located in the grassed area to the west of the solar carport.</i>” Elsewhere, Document 1 refers to the removal of raised SuDS planters from the design – one of the reasons for this is stated to be concern surrounding the viability of plants within the planters under the shade of the carport. NB there are many species adapted for shaded conditions, for example those adapted for woodland settings. Therefore, suitable species would be able to be found to ensure viability. For either scenario, there will need to be full details provided, which would be required within a GIS and long-term habitat/landscape management plan in line with PPW 12 (see below).
Enhancement	YES	There will need to be enhancement of the site in line with the Environment (Wales) Act 2016.
Planning Policy Wales 12 (Chapter 6)	YES	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> For further information, see here - Planning Policy Wales - Edition 12 (gov.wales)
Other		Question - is anything proposed in terms of extra lighting? The answer to this question is still required. None of the submitted supporting documents appear to include any reference to new onsite lighting.

REFERENCES

Black, T. V., & Robertson, B. A. (2020). How to disguise evolutionary traps created by solar panels. *Journal of Insect Conservation*, 24, 241–247.