

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 4

Date of previous memo: 12/11/2024

Date: 24/09/2025

SUBJECT: P/24/0133 | Extension to existing hotel to provide additional bedrooms, together with alterations to the car park and associated works | Travel Inn Duffryn Road Pentrebach Merthyr Tydfil CF48 4BB

Documents submitted in support of this application:

1. Premier Inn Merthyr Tydfil, Duffryn, Pentrebach, Merthyr Tydfil, CF48 4BB. Preliminary Ecological Appraisal. Arbtech. **Issue 6.0. Dated 27/08/2025.**
2. Merthyr Tydfil Premier Inn. Green Infrastructure Statement. Walsingham Planning. **Dated August 2025.**
3. Premier Inn, Duffryn, Pentrebach, Merthyr Tydfil, CF48 4BB. Arboricultural Method Statement. Arbtech. **Dated 04 September 2025.**
4. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Proposed Context Plan. Drawing Number: 6153-PL 003. **Revision D. Dated: 13/08/25. Prepared by Axiom Architects on behalf of Whitbread Group PLC.**
5. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Proposed Site Plan. Drawing Number: 6153-PL 011. **Revision G. Dated: 13/08/25. Prepared by Axiom Architects on behalf of Whitbread Group PLC.**
6. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Proposed Elevations. Drawing Number: 6153-PL 210. **Revision D. Dated: 13/08/25. Prepared by Axiom Architects on behalf of Whitbread Group PLC.**
7. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Proposed Elevations and Ecology Enhancements. Drawing Number: 6153-PL 005. **Dated: 17/05/24. Prepared by Axiom Architects on behalf of Whitbread Group PLC.**
8. Premier Inn Merthyr Tydfil, Duffryn, Pentrebach, Merthyr Tydfil, CF48 4BB. Ecological Mitigation, Enhancement and Management. Arbtech. **Issue 4. Dated 27/08/2025.**
9. Premier Inn, Duffryn, Pentrebach, Merthyr Tydfil, CF48 4BB. Arboricultural Survey to BS5837: 2012. Arbtech. **Dated 23 July 2025.**
10. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Detailed Landscape Proposals – 1 of 2: 1266-SW-01. **Revision A. Dated: 08/08/25. Prepared by Indigo Landscape Architects Ltd on behalf of Whitbread Group PLC.**
11. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Detailed Landscape Proposals – 2 of 2: 1266-SW-02. **Revision A. Dated: 08/08/25. Prepared by Indigo Landscape Architects Ltd on behalf of Whitbread Group PLC.**

Document 1

- In terms of trees already removed from site, there is some discrepancy between the information (in red text) within Document 1 (PEA) and the information (in red text) within Document 9 (Arb Survey Report).

Document 1 (PEA)	Document 9 (Arb Survey)
Trees removed following the 2024 PEA survey and report:	Trees removed following the Arb survey:
11 mature Ash trees in G08	G08 - groups partially removed
1 Ash tree (T32)	1 Bird Cherry (T33)
1 Monkey Puzzle tree (T30)	

Please can this information be made consistent?

- Within Document 1 there is further ambiguity regarding the trees still existing onsite that are earmarked for removal.
 - Page 5 (of 37) x2 trees for removal – a Silver Birch (presumably T07) and a Scot's Pine (presumably T08)
 - Page 12 (of 37) Statement that x4 are to be removed (T05-T08)

Please can this information be made consistent?

- Page 15 (of 37). Suggested enhancements are ambiguous '*The bat boxes will be installed on the hotel and integrated into the design ...*'. Please change this to '*The bat boxes will be integrated into the new building extension.*'

Document 4

- This drawing includes the proposed positions for:
 - Hedgehog Houses
 - Hibernacula
 - Insect Houses
- Other enhancements that also need to be marked:
 - Integrated Bat Boxes
 - Surface-mounted Bat Boxes for trees
 - Integrated Swift Boxes
 - Gaps through Boundaries (for Hedgehogs)
 - Enhancement of modified grassland
 - Brash Piles (for Hedgehogs)
 - Deadwood Piles (for Insects)

Document 8

- Page 8. Suggested enhancements are ambiguous '*The bat boxes will be installed on the hotel and integrated into the design ...*'. Please change this to '*The bat boxes will be integrated into the new building extension.*'

- Page 9. The preferred models for the integrated bat boxes are not clear – ‘Vivara pro building bat box’ and ‘Integrated eco bat box’. It is assumed these refer to ‘Vivara Pro Build-in Bat Box - <https://www.nhbs.com/vivara-pro-build-in-woodstone-bat-box>’ and ‘Nestbox Company Integrated Eco Bat Box - <https://www.nestbox.co.uk/products/integrated-eco-bat-box>’.

In addition, a preferred bat box model and hyperlink for the box proposed to be added to the mature tree should be added.

- Page 10. There is no recommendation for enhancement in terms of lighting. Existing, onsite lighting across the site could be reviewed and changes to more wildlife friendly lighting - as per the latest best practice guidelines:
 - Guidance Note GN08/23 Bats and Artificial Lighting At Night. Bat Conservation Trust and The Institute of Lighting Professionals 2023
<https://www.theilp.org.uk/documents/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>
- Page 11. Statement that the bird boxes ‘... will be installed on the newly constructed hotel extension and/or the mature trees in the woodland.’ This must be specific – later in the document swift boxes are recommended for the proposed extension.. This information should be made consistent.
- Page 13. Timing of Works – ‘Construction activities will be restricted to the normal working day (7am-7pm) to avoid impacts on crepuscular and nocturnal works.’ To avoid such impacts, the wording should be that works will be restricted to daylight hours and that Artificial Light At Night (ALAN) will not be used.
- Page 18 – ‘Prior to the felling of T1 ...’ is this an error – should it be T08?
- Page 21 – Enhancement of Modified Grassland – this should be included in the long-term management plan (see later comments).
- Page 23 – Habitats – ‘12 new trees will be planted across the developed site. In addition to this, to compensate for the loss of trees from G08 and the removal of T30 T32 – a 1:1 native tree planting scheme will be implemented.’

So this would mean a total of 25 new trees (12 trees as a 3:1 compensation for those trees to be lost to facilitate the development T5-T8 and 13 trees as a 1:1 compensate for those lost unconnected to the planning application. – see further comments in relation to Documents 10 and 11.

- Table 3. Pages 21-29 includes management prescriptions for the newly proposed habitat on site. This should be consistent with the information provided in Detailed Landscape Proposals (Documents 9 and 10). Please amend these documents as required.
- Page 26 specifies x2 bat boxes for the building (Ibstock Enclosed Bat Box ‘C’ - <https://www.nhbs.com/ibstock-enclosed-bat-box-c>). This is a different model to that referred to earlier in the document on page 9. Please make this information consistent.
- x3 Woodstone Harlech Bat Boxes are also recommended for use on trees. Page 9 specifies x1 box to be erected on a tree. The increase in the number of boxes is welcomed, but the information should be consistent.

Page 27 shows an image of the Harlech Woodstone Bat Box - <https://www.wildcare.co.uk/harlech-woodstone-bat-box-11266.html>). NB this image is incorrectly labelled as Ibstock Bat Box. Please could the model for erection on trees be changed to a self-cleaning model, for example – Greenwood’s

Ecohabitats Single Crevice Bat Box - <https://www.greenwoodsecohabitats.co.uk/shop> with a round back for trees.

- Page 29 – please amend the hedgehog box model to a woodstone or woodcrete model, for example - Schwegler Hedgehog Dome - <https://www.nhbs.com/search?q=hedgehog&qview=161285> or Vivara Pro WoodStone Hedgehog House - <https://www.pitchcare.com/products/woodstone-hedgehog-house>.

Document 7

- The bird boxes are shown on the western elevation. These need to be moved to the eastern (or northern) elevation.
- For both the bird boxes and the bat boxes the drawing should specify the installation method (i.e., integrated), preferred model type and hyperlink to specification.

Documents 10 and 11

- All species must be native and of local (if not Welsh or UK) provenance. Amendments are required.
- The seed mix for the lawned areas should be changed to Emorsgate EL1 Flowering Lawn Mixture - [EL1 Flowering Lawn Mixture - Emorsgate Seeds](#).
- Document 10 includes management prescriptions for the newly proposed habitat on site. This should be consistent with the information provided in Document 8. Please amend documents as required.
- The Enhancement of Modified Grassland as set out in Document 8 must be included in the long-term management plan.
- The long-term management plan must be long term (25-30 years as a minimum). This must be explicitly stated. Other information required includes who will be responsible for the management and the funding mechanism that will be used (NB this must anticipate rising costs over time).
- Document 8, page 23 – Habitats, states ‘12 new trees will be planted across the developed site. ***In addition to this, to compensate for the loss of trees from G08 and the removal of T30 T32 – a 1:1 native tree planting scheme will be implemented.***’

So, this would mean a total of 25 new trees [12 trees as a 3:1 compensation for those trees to be lost to facilitate the development (T5-T8) and 13 trees as a 1:1 compensate for those lost unconnected to the planning application (within G08, T30 and T32)].

Documents 10 and 11 show a total of 14 trees. Therefore 11 further trees are required.

There are x3 references to the use of herbicides in Document 11. This is not acceptable and these references must be removed. NB any other references to herbicides in any of the documentation submitted in relation to the application must be removed (unless in connection with the control of INNS).

General

- An internal and external Lighting Scheme must be submitted to and approved in writing by the local planning authority. The Lighting Scheme must conform to the latest guidance for wildlife-friendly lighting (see above for references within comments for Document 8). The lighting plan will ensure the integrated bat boxes in the proposed extension will not be directly illuminated and that there will be dark routes to and from suitable habitat nearby.

NB other, existing, onsite lighting should be reviewed and changes to more wildlife friendly lighting (as per the latest ILP/BCT guidelines) implemented as an enhancement measure.

CONDITIONS

- No development shall take place (including ground works, vegetation clearance) until an INNS method statement has been submitted to and approved in writing by the local planning authority. This must include measures for Japanese knotweed, snowberry and cherry laurel.
- Evidence required that ecological measures have been installed, created, implemented etc will be required post-development