

INTERNAL MEMORANDUM

To: Rebecca Owens
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 2

Date of previous memo: 18/11/2025

Date: 03/02/2026

SUBJECT: P/25/0265 | Demolition of existing buildings and development of a restaurant with drive-thru facility (Use Class A3) including access and cycle path, servicing, car parking, hard and soft landscaping, advertisements and other associated works | Land To The North Of The Heads Of The Valleys Road Off Rhymney Common Road Dowlais Merthyr Tydfil CF48 2YG

*DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE APPLICATION (new documents and amended document versions highlighted with **bold text**)*

1. McDonald's Merthyr Tydfil, Heads of the Valley Road. Ecological Appraisal *prepared by* The Environmental Dimension Partnership Ltd *on behalf of* McDonald's Restaurants Ltd. **Report Reference: edp9069_r002b. Dated December 2025.**
 - a. Appendix EDP 3 - Extended Phase 1 Habitat Survey Results
 - b. Appendix EDP 4 – Bat Survey
2. McDonald's Merthyr Tydfil, Heads of the Valley Road. Green Infrastructure Assessment *prepared by* The Environmental Dimension Partnership Ltd *on behalf of* McDonald's Restaurants Ltd. Report Reference: edp9069_r005a. Dated September 2025.
3. McDonald's Merthyr Tydfil, Heads of the Valley Road. Landscape and Ecological Management Plan *prepared by* The Environmental Dimension Partnership Ltd *on behalf of* McDonald's Restaurants Ltd. **Report Reference: edp9069_r006b, dated December 2025.**
4. McDonald's Merthyr Tydfil, Heads of the Valley Road. Detailed Planting Plan *prepared by* The Environmental Dimension Partnership Ltd *on behalf of* McDonald's Restaurants Ltd. **Drawing Number: edp9069_d012d. Issue D. Dated 18/12/2025.**
5. McDonald's Merthyr Tydfil, Heads of the Valley Road. Arboricultural Method Statement (Incorporating Arboricultural Impact Assessment and Tree Protection) *prepared by* The Environmental Dimension Partnership Ltd *on behalf of* McDonald's Restaurants Ltd. Report Reference: edp9069_r004a. Dated September 2025.
6. McDonald's, Heads of Valleys Road, Merthyr Tydfil (ST2685). Construction Environmental Management Plan *prepared by* Glanville. Issue 2. Dated: 16 Sept 2025.
7. McDonald's Merthyr Tydfil. Drawing Name: LiAS Design Notes & Luminaire Schedule. Sheet No: DWG 00. Rev 2. Dated: 05/09/25.
8. McDonald's Merthyr Tydfil Heads of the Valleys Road. Hard Landscape Plan *prepared by* The Environmental Dimension Partnership Ltd *on behalf of* McDonald's Restaurants Ltd. Drawing Number: edp9069_d013e. Issue E ("**Amends to bat boxes per LPA comments**"), dated 18/12/2025.
9. Briefing Note - Land at Heads of the Valleys Road (Reference P/25/0266) Response to consultee comments. Reference 68415/01/SC/TR. *Prepared by* Lichfields. Dated: 22 December 2025.
10. McDonald's Merthyr Tydfil (Heads of Valley). Lighting Impact Assessment Report: Car Park & Drive-Thru External Lighting *prepared by* LAUK Lighting Limited. Dated 22nd December 2025.
11. McDonald's Merthyr Tydfil. Proposed Lighting Layout, DWG 01, Rev 2 (Bollard Layout Change) *prepared by* Signify. Dated 05/09/2025.
12. McDonald's Merthyr Tydfil, Heads of the Valleys Road. Construction Environmental Management Plan: Biodiversity. Report Reference: edp9069_r007a *prepared by* The Environmental Dimension Partnership Ltd *on behalf of* McDonald's Restaurants Ltd. Dated January 2026.
13. McDonald's Merthyr Tydfil, Heads of the Valleys Road. Construction Environmental Management Plan: Biodiversity *prepared by* The Environmental Dimension Partnership Ltd *on behalf of* McDonald's Restaurants Ltd. Report Reference: edp9069_r007a. Dated, January 2026.

COMMENTS – Document 1 (Ecological Appraisal) – previous comments remaining from memo #1 (18/11/2025) in standard text with new comments shown in **bold** text.

- The proposed positions of all for post-development onsite bat roosting opportunities (including for example retained roosts and new bat boxes) must be marked on a plan. These must not be directly illuminated and there must be dark zones allowing access routes from the boxes to nearby suitable, connected, foraging and commuting habitat. This must be demonstrated within the lighting scheme for the site – see comments on the lighting scheme (Document 7) later in this document.

The positions for x6 bat boxes and x1 bird box are shown on Document 8 (Hard Landscaping Plan - edp9069_d013e). The boxes have not been shown in the context of the horizontal illuminance plan (Document 11 - Proposed Lighting Layout, DWG 01, Rev 2), however, comparing the two plans, the bird box appears to be within a zone labelled as 6.25 lux and the bat boxes within a zone labelled as 0.5 lux. See further comments regarding the box positions and lighting later in this document.

COMMENTS – Document 2 (GIS)

- All species within the planting plan must be native species of local (if not Welsh or UK) provenance.

75% native species and 25% non-native / cultivar / nativar species will be accepted as a compromise, provided that species within the 25% can be demonstrated to present a benefit for, and no harm to, wildlife. The following references include species that would be acceptable:

- https://www.nonnativespecies.org/assets/Apha_garden_booklet_AW_proof1.pdf
- [RHS Plants for Pollinators: Garden plants](#)

These provide plant ranges that are deemed to be non-invasive and pollinator friendly.

NB at least one of the species listed on the current plan (whilst not on Schedule 9 of the WCA) can be invasive - Box Honeysuckle, *Lonicera nitida*. Species such as this must be avoided.

A further adjustment to the planting plan is therefore required.

COMMENTS – Document 3 (Landscape & Ecological management Plan)

- All species within the planting plan must be native species of local (if not Welsh or UK) provenance.

See comments regarding Document 2 (above).

COMMENTS – Document 4 (Planting Plan)

- All species within the planting plan must be native species of local (if not Welsh or UK) provenance.

See comments regarding Document 2 and 3 (above).

COMMENTS – Document 6 CEMP)

- The demolition section should refer to the bat licence, ecological supervision etc. Any other ecological considerations must also be referred to within this document. There could just be a reference to the CEMP-B (see later in this document).

This has now all been covered by Document 13 (Construction Environmental Management Plan: Biodiversity).

COMMENTS – Document 7 (Lighting Scheme)

- The onsite lighting must comply with the following:
 - A. 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/>

B. 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>

- Colour temperatures of luminaires are provided (2700K) apart from the bollard lights - OptiSpace BCB500 T25 1 xLED25/830 A lamp(s): LED25/830. There is no information regarding the colour temperature for this lighting type.

The lowest available colour temperature for the chosen bollard lights is 3000K, which is higher than the acceptable colour temperature of 2700K or lower. However, there is a range of alternatives to this bollard lighting model, for example:

- <https://www.trtlighting.co.uk/product/via-dark-sky/>
- <https://www.collingwoodlighting.com/product/product-3/>
- <https://www.gemmalighting.com/news/2700k-warm-white-bollard/>
- In terms of illumination, most of the site is proposed to be 6.25 lux or higher. There is therefore an acceptable level of light-spill onto habitat bounding the site as well as the habitat within the eastern spur. Additionally, some, or all, of the areas may have bat or bird boxes (yet to be finalised – see comments regarding Document 1 above). Such areas must be kept dark (as defined by Document A above, i.e., 0.2 lux on the horizontal plane and 0.4 lux on the vertical plane). The submission of an illuminance plan with contours down to 0.2 lux will aid in the demonstration of this requirement.

Part of the solution would be removing the bollard lighting proposed for the eastern spur.

Additionally, Document A (above) page 30 states:

“The use of bollard or low-level downward-directional luminaires is strongly discouraged. This is due to a considerable range of issues, such as unacceptable glare, poor illumination efficiency, unacceptable upward light output, increased upward light scatter from surfaces and poor facial recognition which makes them unsuitable for most sites.”

The current positions of the wildlife boxes are shown on Document 8 (Hard Landscaping Plan - edp9069_d013e). In the context of the horizontal illuminance plan (Document 11), it appears that the bird box will be within a zone labelled 6.25 lux and the bat boxes within a zone labelled 0.5 lux.

As stated previously (see above) the boxes must be positioned in dark areas with associated dark routes provided (the resident bats appear to be exiting their roosts and heading north to suitable habitat). NB darkness, as defined by Document A, is for example 0.2 lux on the horizontal plane.

To achieve this, adjustments to the lighting are required. Alternatively, there may be an option change the positions of the boxes further away from the light sources. To inform these adjustments and/or changes, the horizontal illuminance plan must first be amended to show lux contours down to 0.2 lux (again as previously requested).

PLANNING CONDITIONS

ECOLOGICAL MITIGATION, COMPENSATION AND ENHANCEMENT MEASURES

No development shall take place (including ground works, vegetation clearance) until details of all biodiversity/ecological enhancements have been submitted to and approved in writing by the local planning authority. All must be clearly marked on architectural drawings, plans and elevations. The development shall then be carried out in accordance with the approved details and maintained as such in perpetuity.

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.

BATS

Warning: A European Protected Species (EPS) Licence is required for this development.

This planning permission does not provide consent to undertake works that require an EPS licence.

It is an offence to deliberately kill, injure, capture or disturb a bat or to recklessly damage or destroy their breeding sites or resting places. If found guilty of any offences, you could be sent to prison for up to 6 months and/or receive an unlimited fine. To undertake works within the law, you can obtain further information on the need for a licence from Natural Resources Wales on 0300 065 3000 or at <https://naturalresources.wales/permits-and-permissions/species-licensing/apply-for-a-protected-species-licence/bat-licences/?lang=en>

NESTING BIRDS

All birds, their nests and eggs are protected by law under the Wildlife and Countryside Act 1981 (as amended) while they are breeding.

If works to any trees, hedgerows and/or other nesting bird habitat (including buildings/structures with suitable features) are to be undertaken, they will take place outside of the bird nesting season. If the works must be undertaken during the nesting season (generally from 1st March until 31st August, although birds are known to nest outside of these dates in suitable conditions), a breeding bird survey will be required and must be carried out by a suitably qualified ecologist. Any active nests identified will be protected until the young have fledged.

Where a Schedule 1 species (as defined in the Wildlife and Countryside Act - <https://www.legislation.gov.uk/ukpga/1981/69/schedule/1>) is involved, compensation for impacts, e.g., loss of nesting sites, will be devised and implemented.