

INTERNAL MEMORANDUM

To: Kate Glover
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 1

Date of previous memo: -

Date: 25/07/2024

SUBJECT: P/22/0178 | Single story front extension to Treharris Fire Station | Treharris Fire Station Thomas Street Treharris CF46 5PR

Fire Station building in Treharris, adjacent to trees and grassland habitat. Reasonably well-linked via garden habitats to valuable habitat (scrub, grassland, woodland, wooded river corridor in the wider environment.

Designated sites within 500m of the application site:

- Sites of Importance for Nature Conservation (SINC) – x5 (closest is Treharris Park & Cardiff Road Woodlands, c.184m from site);
- Ancient Semi Natural Woodland (ASNW) – x11

Priority and protected species within 500m of the application site:

- Birds (including Schedule 1¹ and Section 7² species);
- Fish (including Section 7² species);
- Invertebrates (including Section 7² species);
- Lichens (including Section 7² species);
- Bats (closest roost record for common pipistrelle, c.170m from site);
- Otter;
- Badger;
- Hedgehog;
- Reptiles;
- Amphibians;
- Vascular plants

Ecological documents submitted in support of the above application

1. Treharris Fire Station, Thomas Street, Treharris, CF46 5PR. Bat Survey report. Version V1.0. Dated: June 2024. Ecological Services Ltd.

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

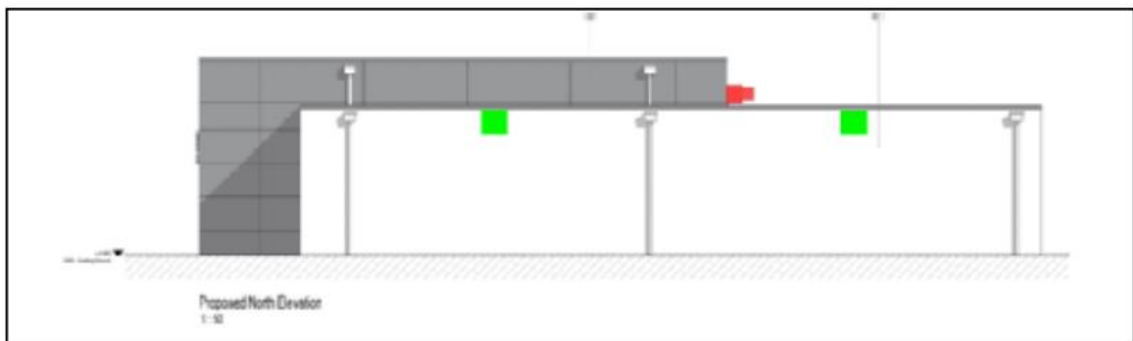
COMMENTS

Enhancement measures – pages 13-14, see below:

Southern Elevation



Northern Elevation



The drawing in the report don't seem to match the submitted drawings – see below:



Amendments required. In addition, the bat box should be positioned as high up as possible, and therefore on the higher part of the building, perhaps near the south-western corner –

see pink polygon in the above drawing for suggestion. In addition, a single bird box will be sufficient and could also feature on the southern elevation as it would be near to, and shaded by, the off-site trees to the south – see green polygon in the above drawing.

All ecological enhancements must be marked on all relevant architect plans prior to determination.

No development shall take place (including ground works, vegetation clearance) until an internal and external Lighting Scheme has been submitted to and approved in writing by the local planning authority. The Lighting Scheme must conform to the latest guidance for wildlife-friendly lighting³.

NB the bat and bird box must not be directly illuminated and there must be a dark route from the boxes to nearby habitat.

Question: any trees be impacted by the scheme? The submitted drawings show that the trees along the southern boundary are offsite – is this correct? These trees appear to overhang the site boundary to the south – will they be impacted? The drawings also show the loss of a tree and some soft landscaping due to the extension of the building.

The loss of the habitat [albeit minor] needs to be assessed by an ecologist and recommendations made for mitigation and compensation – NB this would tie-in to the PPW 12 requirements including the tree replacement ratio and the Green Infrastructure Statement – see below.

The commissioned ecologist must take new Planning Policy Wales (PPW 12), Chapter 6 into account where relevant to this application.

The main changes to 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 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 (which will be further refined in the consolidated version of 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*

³ 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/>

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.*
