

INTERNAL MEMORANDUM

To	Gareth Davies
From	Matt Davies
Memo #	1
Date	17/07/2026
Previous memo date	-
Applications:	P/26/0160 Prior Notification for demolition works Cefn Fforest Farm Twynygarreg Treharris CF46 5RN P/26/0161 Lawful Development Certificate for proposed assorted extensions and works Cefn Fforest Farm Twynygarreg Treharris CF46 5RN

SITE DESCRIPTION

Collection of farm buildings. Close to agricultural fields and large areas of broadleaved woodland linked by scattered trees, treelines and hedgerows.

DESIGNATED SITES WITHIN 500M OF THE APPLICATION SITE

✓ Sites of Importance for Nature Conservation (SINC)	2x, closest - St Tydfil Forest East (c.126m)
✓ Ancient Semi Natural Woodland (ASNW)	9x
✓ Plantation on Ancient Woodland Site (PAWS)	2x
✓ Ancient Woodland Site of Unknown Category (AWSUC)	2x
✓ NRW Priority Area (Woodland – PAWS)	2x

PRIORITY AND PROTECTED SPECIES WITHIN 500M OF THE APPLICATION SITE

<i>Species / Species Group</i>	<i>Closest record(s)</i>
✓ Birds (including Schedule 1 ¹ and Section 7 ² species);	Barn owl (c.314m)
✓ Fish (including Section 7 ² species);	Brown trout (c.917m)
✓ Fungi + Slime Moulds (including Section 7 ² species);	Tiered tooth (c.359m)
✓ Invertebrates (including Section 7 ² species)	Small pearl-bordered fritillary (c.414m)
✓ Lichens (including Section 7 ² species);	Witches' whiskers lichen (c.759m)
✓ Mammals	
✓ Bats (European protected species ³ + some Section 7 ² species);	Closest record - Unidentified bat species (c.759m) Also records for - Lesser horseshoe bat (closest, c.1299m)
✓ Dormouse (European protected species ³ + Section 7 ² species);	(c.1307m)
✓ Hedgehog (Section 7 ² species);	(c.759m)

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

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

✓ Reptiles (Section 7 ² species);	Common lizard (c.340m)
✓ Amphibians	
✓ Common toad (Section 7 ² species);	(c.917m)
✓ Vascular plants (including Section 7 ² species).	Bluebell (c.462m)

DOCUMENTS SUBMITTED IN SUPPORT OF P/26/0160, but also relevant to P/26/0161

1	Cefn Fforest Farm, Treharris. Bat Activity Survey Report, Issue 1VA, prepared by BE Ecological Ltd. Dated: 23/06/2026
---	---

REQUIREMENTS AND COMMENTS

General

The Pre-App advice for this scheme requested a PEA as well as a PRA – this is required.

Document 1

There is insufficient interpretation regarding the PRA of the buildings in question. What species of bat and types of roost are they suitable for? What level of suitability was found for each? Etc. Full justification for the number of dusk emergence surveys undertaken is needed.

It is unclear why a BARB+ data search was not undertaken.

The open nature of the buildings means they would be suitable for night-roosting horseshoe bats.

There are relatively nearby records of lesser horseshoe bats [within the CSZ radius⁴ for lesser (2km) and greater (3km) horseshoe bats] and close-by suitable foraging and commuting habitat for lesser⁵ and greater⁶ horseshoe bats.

Given the above, further survey effort is required in the form of overnight automatic/static detector deployment within the interior of the buildings used to rule night-roosting in or out. This does not appear to have been undertaken to date and is required.

There are no details of compensation for loss of nesting and roosting opportunities (this must include compensation for any loss of night-roosting opportunities) or for enhancement.

Have barn owl been ruled out?

Survey work?	YES	See above.
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</i>

⁴ The area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the resilience and conservation status of the colony using the roost.

⁵ Preferred foraging habitats include broadleaved woodland connected by potential flight paths (e.g., hedges, woodland edge and riparian trees). Will cross open spaces immediately after emergence.

⁶ Preferred foraging habitats include ancient semi-natural and deciduous woodland and cattle grazed pastures.

		<i>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)
--	--	---