

INTERNAL MEMORANDUM

To: Kate Glover
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1
Date of previous memo: -
Date: 12/11/2024

SUBJECT: P/24/0139 | Two storey rear extension | 200 High Street Cefn Coed Merthyr Tydfil CF48 2PG

DOCUMENTS RELEVANT TO THIS APPLICATION

1. Ecological Inspection of 200 High Street, Cefn Coed, Proposed for Rear Extension. Letter-style report *prepared by Ecology Wales on behalf of Helen Weaver*. Dated: 31/10/2024.
2. Consultation response from Natural Resources Wales. Reference: CAS-258875-Q4D5. Dated 09/07/2024.

COMMENTS

Document 1

The report identifies the onsite building as having Moderate suitability to support roosting bats and nesting birds. More information is required regarding the species of bat the building is moderately suitable for, e.g., crevice-dwelling; roof-void dwelling; those requiring a flight space; those that need a light space and flying access into a roost.

A plan setting out where the PRFs are on the building would also be useful along with the details of the further dusk emergence surveys that will be undertaken, e.g., numbers of surveyors, use of Night Vision Aids (NVAs), positioning of surveyors and NVAs etc. Surveys must be undertaken in line with up-to-date industry guidelines (Collins, J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edition). The Bat Conservation Trust, London.). Deployment of static/automated detectors within appropriate parts of the building is also recommended to provide as much information as possible.

NB this application cannot be determined until the results of the bat dusk emergence surveys have been presented.

Clarification is required regarding any removal of habitat in relation to the scheme, *for example*, as mentioned in Document 1 – mature Ash and Maple trees and Laurel scrub.

Document 2

In relation to the proximity of the Cwm Taf Fechan Woodlands SSSI, NRW have the following comments:

“Protected Sites

The application site is close, approximately 6m, to Cwm Taf Fechan Woodlands Site of Special Scientific Interest (SSSI) which includes the Taf Fechan river. The terrain to the SSSI from the application site is steep (downhill) and wooded. It is important that construction works do not adversely impact the SSSI. We therefore request a brief construction method statement is submitted to demonstrate how the SSSI will be protected from construction works. This may be conditioned. The construction method statement should be illustrated with photographs, and include the following:

- *how materials and equipment will be transported to the rear of the house*
- *the working footprint of the proposal*

- *how waste generated will be managed*
- *details of site construction drainage*

We refer the applicant to General pollution prevention guidance which should be used when developing any pollution prevention measures for the site. In particular we refer the applicant to GPP5 and GPP6. These can be found here: [gpp-5-works-and-maintenance-in-or-near-water.pdf](#) and here: [gpp6-working-on-construction-and-demolition-sites.pdf](#).”

This requirement will need to be conditioned. NB other planning conditions in relation to ecology are likely to be required. This will be clarified following presentation of the results of the bat survey work and receipt of the GIS and associated landscaping plan (see below).

Other requirements

There will need to be enhancement of the site in line with the Environment (Wales) Act 2016.

Planning Policy Wales (PPW 12), Chapter 6 must be considered where relevant to this application.

The main elements of the 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 [GIS]** 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 (included within 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 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.*

For further information, see here - [Planning Policy Wales - Edition 12 \(gov.wales\)](#)