INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1
Date of previous memo: -
Date: 11/06/2025

SUBJECT: P/25/0165 | Demolition, ground reclamation and remediation and outline planning application with all matters reserved (except for the main access points) for the comprehensive redevelopment of the former Hoover site to create a new neighbourhood, including up to 441 new homes, 1.5 hectares of employment land (including B1 (business), B2 (general industrial), B8 (storage and distribution) and sui generis uses), community hub (including A1 (shops), A2 (financial and professional services) A3 (food and drink), B1 (business), D1 (non-residential institutions) and sui generis uses, community heat hub, metro station and transport hub (including transport interchange and parking), a network of open spaces (including parkland, active travel routes, areas for informal recreation and SUDS attenuation features) together with associated works, including improvement/works to the highway network.| Former Hoovers Site Pentrebach Road Pentrebach

DOCUMENTS RELATED TO ECOLOGY PROVIDED IN SUPPORT OF THE ABOVE APPLICATION

1. Hoover Site, Merthyr Tydfil. Preliminary Ecological Appraisal (PEA) Report *prepared by* Redstart. Project No: GC/004005. Doc Ref: GC4005-RED-74-XX-RP-L-0001. Rev: P01. Dated: 05/05/2022.
2. Hoover Site, Merthyr Tydfil. Preliminary Ecological Appraisal *prepared by* Sylvan Ecology *on behalf of* Walters. Project No: K001. Doc Number: K001 – PEA Report V1.2. Dated: 05/11/2024. ***Addendum to Document 1.***
3. Proposed Residential Development, Former Hoover Site, Merthyr. Green Infrastructure Statement prepared by TDA on behalf of Walters Land Ltd. Dated: March 2025.
4. The Hoover Factory, Merthyr Tydfil. Tree Survey *prepared by* Treescene Arboricultural Consultants *on behalf of* Walters. Dated: 19th November 2024.
5. The Hoover Factory, Merthyr Tydfil. Tree Constraints Plan *prepared by* Treescene Arboricultural Consultants *on behalf of* Walters.

COMMENTS

Biodiversity data

Document 1: Desk Study undertaken January 2021 (approx. 3 years, 10 months old) and so is out of date.

Document 2: Represents a top-up to the 2022 study, but no date has been included for an updated Desk Study – please can this be added along with the unique SEWBReC reference number?

Field survey

Document 1: Field Survey undertaken April 2022 (approx. 2 years, 7 months) and so out of date.

Document 2: Represents a top-up site visit – most recent Field Survey undertaken October 2024 and so up to date and acceptable.

Bats: roosting - structures

Document 1 (2022) includes a Preliminary Roost Assessment (PRA) of the buildings. This was only undertaken superficially, and further survey effort was required and highlighted within the Document 1, page 26, 6.1.1:

"*A detailed ground level building survey should be carried out to assess potential roost access points; and identify the level of potential for bat presence. This will be required to determine the nature of further surveys which may be required prior to the commencement of the proposed works."*

Can it be confirmed that the subsequent 2024 study (Document 2) represents the aforementioned *'detailed ground level building survey'*?

Was an internal survey undertaken (NB no reference to an internal survey in the document)? If not, this will be carried out.

Document 2 identifies suitability of the buildings for roosting bats – page 28, 5.1:

"*Multiple buildings within the site were noted to provide potential for roosting bats as they were in poor condition and contained many gaps and lifted boards. These buildings will require further survey to determine if they support roosting bats*."

The level of potential suitability for roosting bats (*none, negligible, low, moderate, high*) for each building (based on the external and internal PRA) has not been provided. This is required. In addition, it must be specified what type of bats the buildings are suitable for (for example: *crevice-dwelling; roof-void dwelling; bats that need a flight space within the roost; bats that need a flight space and flying access into the roost*) and also what kinds of roosts could be present (e.g., *day roost, night roost, feeding roost, maternity roost, hibernation roost, etc*).

Document 2, page 31, 6.1:

"*Bat surveys will be required to inform the sites development. The extent of the survey work will be established in consultation with the local council.*"

The commissioned ecologists must interpret the results of their PRA in line with the latest Bat Survey Good Practice Guidelines[1] as alluded to above. This will then dictate the extent and types of the further bat survey work necessary (again, as set out in the guidelines). All details of the proposed bat survey work must presented to the LPA for consideration prior to commencement of the survey programme. NB it will be expected that NVAs will be used and Automated/Static detectors deployed within buildings (where appropriate).

NB Document 1 points out that some Potential Roost Features (PRFs) may be missed due to the height, size, and number of buildings on site and features not always being visible from ground level. This will therefore also feed into the decision regarding the nature of the survey work (number of visits, number and placement of surveyors, number and placement of Night Vision Aids (NVAs) etc).

All this further information will be required within Document 2.

Bats: roosting – trees

Document 1 states:

"*No suitable roost features were noted within trees within the site survey boundary during the survey*."

[1] Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

Document 2 states,

"*None of the trees within or around the site were noted to have PRFs at the time of survey*."

It needs to be confirmed whether *all* onsite trees have been subject to a full Ground Level Tree Assessment (GLTA).

Document 4:

There are several trees recommended for pruning works or removal within the Tree Survey report. There are also references to internal decay, which could indicate there may be features suitable for, e.g., roosting bats, nesting birds etc.

Any GLTA survey should cross reference and consider the information within the Tree Survey report. A re-survey of those trees stating to have decay may be appropriate.

Bats: flight paths + foraging habitats

Document 1 states:

"*There is high potential for habitats such as the riparian and woodland habitats associated with the River Taff SINC within the site survey boundary to support commuting and foraging bats.*"

Document 2 states:

"*The buildings, grassland and woodland which comprise the majority of the site are considered low-moderate quality foraging habitat for bats.*"

This seems like a marked difference in interpretation. A definitive evaluation of onsite habitat is needed to assess the potential suitability regarding flight-paths and foraging habitat (e,g., *low, moderate or high*). This will inform the need for/extent of Night-time Bat Walkover (NBW) surveys and Automated/Static surveys as set out in the latest Bat Survey Good Practice Guidelines[1]. These surveys will provide a picture of how bats are using the site to help inform a sensitive lighting plan.

Bat: survey work

All bat survey work is required to be undertaken prior to determination. Bat surveys cannot be conditioned.

Habitats of Principle Importance

Section 7 Habitats of Principle Importance for the purposes of maintaining and enhancing biodiversity in relation to Wales [Environment (Wales) Act 2016] were identified within the 2022 survey. Namely, Lowland mixed deciduous woodland, Wet woodland and Rivers. These habitats will need consideration and protection (if impacted) within the overall scheme.

NB the new Chapter 6 of PPW 12, page 13, 1b) of the Step-Wise Approach states:

"Proposals in statutory designated sites are, as a matter of principle unacceptable, and therefore must be excluded from site searches undertaken by developers. This principle also extends to those sites containing protected species and habitats which are ***irreplaceable*** *and must be safeguarded."*

Wet woodland is given as an example of an irreplaceable habitat.

The exact positions of these Habitats of Principle Importance must be provided and any impacts considered.

Designated sites

There may be impacts on the adjacent Afon Taf Site of Importance for Nature Conservation (SINC). This will require a robust and appropriate buffer zone and will need to be dark (see lighting section below).

The river SINC is highlighted in both reports (Documents 1 +2), but more information will be required regarding its protection and buffering from the site.

Invasive Non-Native Species (INNS)

Document 1 identified three Schedule 9 plant species (Section 14 of the Wildlife and Countryside Act 1981) were found on or near to the site (Montbretia: *Crocosmia x crocosmiiflora*, Cotoneaster: *Cotoneaster horizontalis*, and Japanese Knotweed: *Fallopia japonica*). Additionally, there were three other species recorded that, whilst not included in Schedule 9, are nonetheless invasive (Snowberry: *Symphoricarpos albus*, Cherry Laurel: *Prunus laurocerasus*, and Wilson's honeysuckle: *Lonicera nitida*).

To add to this list, Document 2 also identified another Schedule 9 plant species - Himalayan balsam: *Impatiens glandulifera* and another invasive species (not included on Schedule 9) – an unspecified bamboo species.

There will need to be a programme of eradication undertaken by a specialist contractor. An INNS Method Statement will need to be submitted for approval.

Other species

Other species that are likely to be impacted include the following examples - otter, dormouse, fish, birds, reptiles, amphibians (including Great Crested Newt), invertebrates (including Marsh Fritillary butterfly), badgers, hedgehog.

Document 1 explores all these groups and assessed the possible impacts of the scheme. Document 2 is not as comprehensive and does not cover all these species – notable omission: otter. Document 2 should be expanded to include these elements.

General issues

- Document 2. DAFORL is stated to have been used (page 7, 2.6) but does not appear in relation the species listed as present onsite.
- Document 2 states that the surveys were undertaken during a sub-optimal season. Surveys were undertaken in June and October. June is an optimal season for a habitat survey.
- Document 2 – as a survey was undertaken in October were any grassland fungi noted onsite?
- Document 2. Page 32, 7.5, "*It is recommended that invert coils be included into any landscape plan.*" What is an 'invert coil'?

Lighting

There will need to be a wildlife-friendly Lighting Scheme (for external *and* internal lighting) for the whole site (including the Metro Station). The scheme must demonstrate dark zones at the boundaries and across/through the site. NB the dark routes should be designed to link to those proposed for the neighbouring Dragon Parc development to the west of the site. Wildlife boxes must not be illuminated (bat, bird) and there must be dark zones to allow barrier-free access to the boxes with routes to and from nearby suitable foraging and commuting habitat. The railway corridor and particularly the river corridor must also be protected from illumination and kept dark (as per the definition within the lighting guidance

specified below (*illuminance at or below 0.2 lux on the horizontal plane, and at or below 0.4 lux on the vertical plane*). The Lighting Scheme must conform to the latest guidance for wildlife-friendly lighting. 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/

NB although this document is aimed at bats, the principles are the similar for other nocturnal and crepuscular species.

The Lighting scheme will need to include:

- The results of an onsite ambient light level survey for use as a baseline
- Horizontal and vertical illuminance plans for the proposed lighting

This could be an opportunity to do something innovative for Merthyr in terms of lighting. The lighting guidelines include useful case studies illustrating what can be achieved in terms of, for example, only using lighting where and also when necessary, colour temperature of luminaires used (some residential schemes have used a 1000K or 1750K colour temperature), security lighting set on motion sensors (1/2 minute timers), use of a Central Management System (CMS) to amend lighting levels where necessary, low levels of lighting during quiet periods of the night, use of solar powered waymarkers etc.

Planning Policy Wales (PPW12), Chapter 6.

NB further details can be found here: https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf

PPW 12 states that a GIS should be submitted with all planning applications that:

- will describe how green infrastructure has been incorporated into planning proposals;
- must be used for demonstrating how the step-wise approach has been applied;
- should highlight baseline data considered and surveys and assessments undertaken, sustainable drainage statements, landscape and ecological management plans etc.
- will consider ecosystem resilience by using the DECCA (Diversity, Extent, Condition, Connectivity, Adaptability) framework.

In addition, the policy indicates that the step-wise approach is the means of demonstrating the steps taken towards securing a net benefit for biodiversity. The onus is on developers to bring forward proposals in a way that will achieve a net benefit for biodiversity demonstrating how they have used the step-wise approach.

NB each stage of the step-wise approach must be accompanied by a detailed long-term management plan. A Landscaping, Habitat + Ecology Scheme (LHES) is therefore required. The LHES must include, but not be limited to, the following:

- Details of retained landscaping/habitat/green infrastructure
- Details of new landscaping/habitat/green infrastructure
- A planting plan. NB all species will be native and of local (if not Welsh or UK) provenance
- Long term (at least 25 years) maintenance and management measures for all onsite landscaping/habitat/green infrastructure (both retained and new)
- Details of other ecological measures, e.g., bat boxes, bird boxes, hibernacula, gaps in boundaries for hedgehogs etc

- Monitoring post-development for all onsite landscaping/habitat/green infrastructure and other ecological measures
- How a net benefit for biodiversity will be achieved within as short a time as possible and be locally responsive and relevant to local circumstances.
- Details of the funding mechanisms to meet the maintenance, management and monitoring objectives.
- Details of the responsible person

Having provided evidence in the Green Infrastructure Statement that the step-wise approach has been followed, a scheme of enhancements must also be provided to ensure a net benefit for biodiversity.

PPW12 also includes specific requirements regarding removal of trees and woodland:

"Where [tree] loss is unavoidable developers will be required to provide compensatory planting (which is proportionate to the proposed loss as identified through an assessment of green infrastructure. Further advice in relation to ancient woodland is available on NRW's website. value including biodiversity, landscape value and carbon capture). Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost. Where a woodland or a shelterbelt area is lost as part of a proposed scheme, the compensation planting must be at a scale, design and species mix reflective of that area lost. In such circumstances, the planting rate must be at a minimum of 1600 trees per hectare for broadleaves, and 2500 trees per hectare for conifers. The planting position for each replacement tree shall be fit to support its establishment and health and ensure its unconstrained long-term growth to optimise the environmental and ecological benefits it affords."

This must also be considered if trees are to be removed to facilitate the proposed development.

See the box below for GIS and LHES requirements in relation to the type of planning application.

For a FULL planning application:

- a detailed GIS, informed by a detailed LHES, both required prior to determination.

For an OUTLINE planning application:

- an outline GIS and outline LHES, setting out broad principles, with the following further information secured by planning condition:
  - detailed GIS, informed by a detailed LHES provided at the reserved matters stage

As P/25/0165 is an OUTLINE application, an outline GIS and LHES will be required. Document 3 represents the outline GIS and is largely acceptable, with the following caveats:

- An outline LHES will be needed to be inform and be cross-referenced with the outline GIS.
- The GIS references an out-of-date lighting guidance document (the 2018 BCT/ILP document is cited, rather than the updated 2023 version) and the GIS must also must reference another lighting guidance document recently published by Welsh Government:
  - 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-batsand-artificial-lighting/
  - Good Practice Guidance: Planning for the Conservation and Enhancement of Darks Skies in Wales. https://www.gov.wales/sites/default/files/publications/2025-02/dark-skies-guidance.pdf

Precautionary Working Method Statement (PWMS)

No development shall take place (including ground works, vegetation clearance) until a Precautionary Working Method Statement (PWMS) for reptiles / amphibians / hedgehog / nesting birds has been submitted to and approved in writing by the Local Planning Authority. The approved PWMS shall be implemented in full according to the specified timescales, unless otherwise agreed in writing by the local planning authority.

Ecological Enhancements

A full and detailed list of biodiversity/ecological enhancements will be submitted to and approved in writing by the local planning authority. The development shall then be carried out in accordance with the approved details and maintained as such in perpetuity.

NB wildlife boxes (e.g., bats/birds) will be integrated into the buildings rather than surface mounted. Any boxes erected on trees will be made of woodcrete or woodstone for reasons of longevity.

All ecological enhancements will be clearly marked on any relevant architect plans/drawings/enhancements. This must include the model number of any proposed boxes. The words 'or equivalent' can be added to allow flexibility in case of difficulty with supply.

Compliance

An Ecological Clerk of Works (ECoW) will be appointed to oversee the scheme. The ECoW will provide a toolbox talk to all contractors prior to the commencement of works, will ensure the PWMS is implemented in full and will supervise the installation, creation, implementation of all biodiversity/ecological measures. Evidence that ecological measures have been installed, created, implemented will be required on completion of the development. This evidence must be submitted to and approved in writing by the local planning authority.

Invasive Non-Native Species (INNS)

No development shall take place (including ground works, vegetation clearance) until an Invasive Non-Native Species (INNS) Method Statement produced by an invasive species specialist has been submitted to and approved in writing by the local planning authority.

Construction Environmental Management Plan - Biodiversity (CEMP-B)

No development shall take place (including ground works, vegetation clearance) until a CEMP-B has been submitted to and approved in writing by the local planning authority.

A CEMP-B is designed to identify risks to biodiversity, evaluate the level of risk and supply methods for the management of these risks.

Hoover Site. Illustrative Concept Framework Masterplan prepared by *Hammond Architectural Ltd* on behalf of *Walters Group. Job number: 2479. Drawing Number: ICF_01. Date: April '25.*

This plan features a strong north-south links to the west of the site along the eastern bank of the River Taff and there are other green corridors providing further north-south links along the eastern boundary of the site itself, as well as west-east links in several places (e.g., Potential Green Transition Zones and Potential Attenuation Areas). Further stepping stone habitat features will also be possible within other areas - examples include rain gardens, swales, treelines, green roofs and walls. This together with the wildlife-friendly lighting measures should represent a large Net Benefit for Biodiversity post-development. NB the results of survey work (for example for bats) may inform some amendments to the layout, but this will not be known until the results are received.