

INTERNAL MEMORANDUM

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

Memo number: 1

Date of previous memo: -

Date: 27/02/2026

SUBJECT: P/26/0034 | Strip existing roof covering and remove existing high level uPVC windows. Replace roof tiles with new BMI concrete to match existing. Replace roof battens, breathable membrane and associated lead work and verges. Replace high level windows with uPVC cladding to match lower levels | Dowlais Elim Family Church Upper Elizabeth Street Dowlais Merthyr Tydfil CF48 3BH.

SITE DESCRIPTION

Church building set in grounds with well-managed amenity grassland. Relatively close to garden habitat, scattered trees, woodland pockets, scrub, grassland.

DESIGNATED SITES WITHIN 500M OF THE APPLICATION SITE

✓ Within a Buglife B-Lines Area.

PRIORITY AND PROTECTED SPECIES WITHIN 500M OF THE APPLICATION SITE

- ✓ Birds (including Schedule 1¹ and Section 7² species);
- ✓ Invertebrates (including Section 7² species)
 - ✓ Marsh fritillary butterfly (Section 7² species), closest record c.1080m from site;
- ✓ Mammals
 - ✓ Bats (European protected species³; some Section 7² species) - closest roost record for lesser horseshoe bat, c.1334m from site);
 - ✓ Hedgehog (Section 7² species);
 - ✓ Water vole;
- ✓ Amphibians
 - ✓ Great crested newt (European protected species³; Section 7 species) - closest record c.990m from site);
- ✓ Vascular plants (including Section 7² species).

REQUIREMENTS

A Preliminary Roost Assessment (PRA) for bats and nesting birds of the church building (undertaken by a suitably qualified and experienced ecologist) is required. This must provide sufficient information for the local planning authority to assess any potential adverse impacts of the proposed development on priority and protected species and/or habitats, or to identify what further information is required before a full assessment is possible.

The results of the PRA will be used to inform whether further surveys are required, or to establish the need for and extent of any mitigation and compensation measures required as part of the proposed development.

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

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

A BARB+ data search required from SEWBReC.

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 \(gov.wales\)](https://gov.wales/planning-policy-wales-edition-12)