

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 5

Date of previous memo: 24/09/2025

Date: 20/11/2025

SUBJECT: P/24/0133 | Extension to existing hotel to provide additional bedrooms, together with alterations to the car park and associated works | Travel Inn Duffryn Road Pentrebach Merthyr Tydfil CF48 4BB

Documents submitted in support of this application:

1. Premier Inn Merthyr Tydfil, Duffryn, Pentrebach, Merthyr Tydfil, CF48 4BB. Preliminary Ecological Appraisal. Arbtech. **Issue 7.0. Dated 14/10/2025.**
2. Merthyr Tydfil Premier Inn. Green Infrastructure Statement. Walsingham Planning. Dated September 2025.
3. Premier Inn, Duffryn, Pentrebach, Merthyr Tydfil, CF48 4BB. Arboricultural Method Statement. Arbtech. **Dated 22 October 2025.**
4. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Proposed Context Plan. Drawing Number: 6153-PL 003. **Revision E (Amendments to ecological enhancements). Dated: 23/10/25.** *Prepared by Axiom Architects on behalf of Whitbread Group PLC.*
5. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Proposed Site Plan. Drawing Number: 6153-PL 011. **Revision H (Amendments to ecological enhancements). Dated: 24/10/25.** *Prepared by Axiom Architects on behalf of Whitbread Group PLC.*
6. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Proposed Elevations. Drawing Number: **6153-PL 210. Revision E. Dated: 21/10/25.** *Prepared by Axiom Architects on behalf of Whitbread Group PLC.*
7. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Proposed Elevations and Ecology Enhancements. Drawing Number: 6153-PL 005. Dated: 17/05/24. *Prepared by Axiom Architects on behalf of Whitbread Group PLC.*
8. Premier Inn Merthyr Tydfil, Duffryn, Pentrebach, Merthyr Tydfil, CF48 4BB. Ecological Mitigation, Enhancement and Management. Arbtech. **Issue 5. Dated 14/10/2025.**
9. Premier Inn, Duffryn, Pentrebach, Merthyr Tydfil, CF48 4BB. Arboricultural Survey to BS5837: 2012. Arbtech. **Dated 23 July 2025.**
10. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Detailed Landscape Proposals – 1 of 2: 1266-SW-02. **Revision C (Native Species amended). Dated: 13/10/25.** *Prepared by Indigo Landscape Architects Ltd on behalf of Whitbread Group PLC.*
11. Merthyr Tydfil Premier Inn Duffryn Road, Pentrebach, CF48 8BB. Detailed Landscape Proposals – 2 of 2: 1266-SW-01. **Revision C (Native Trees added). Dated: 13/10/25.** *Prepared by Indigo Landscape Architects Ltd on behalf of Whitbread Group PLC.*
12. Premier Inn Hotels, Duffryn, Pentrebach [sic], Marthyr [sic], Tydfil, CF48 4BB. Tree Protection Plan *prepared by* Arbtech. Drawing No: Arbtech TPP 01. **Rev: D. Dated 22/10/25.**

Document 1

- In terms of trees already removed from site, there is **still** some discrepancy between the information (in red text) within Document 1 (PEA) and the information (in red text) within Document 9 (Arb Survey Report). **The Arb report does not state that T30 and T32 have been removed – text from the Arb report added to table below.**

Document 1 (PEA)	Document 9 (Arb Survey)
Trees removed following the 2024 PEA survey and report:	Trees removed following the Arb survey:
11 mature Ash trees in G08	G08 - groups partially removed
1 Ash tree (T32)	T32 - Tree is situated to the west of Premier Inn; Main stem breaks to multiple stems at 3 m; Historically pruned to the eastern lateral extent to non appropriate attachment points; Naturally occurring deadwood typical for species.
1 Cherry (T33)	1 Bird Cherry (T33)
1 Monkey Puzzle tree (T30)	T30 - Tree is dead standing.

Please can this information be made consistent? **Still needed.**

Document 4

- This drawing includes the proposed positions for:
 - Hedgehog Houses
 - Hibernacula
 - Insect Houses
- Other enhancements that also need to be marked:
 - **Integrated Bat Boxes**
 - **Surface-mounted Bat Boxes for trees**
 - **Integrated Swift Boxes**
 - Gaps through Boundaries (for Hedgehogs)
 - Enhancement of modified grassland
 - Brash Piles (for Hedgehogs)
 - Deadwood Piles (for Insects)

All elements added to the new version *apart from the bat and bird boxes* – still required.

Documents 10 and 11

- Other information required includes who will be responsible for the management and the funding mechanism that will be used (NB this must anticipate rising costs over time). **Can't see this within the documents? Please can this be highlighted (if already included) or added (if not already included)?**
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PLANNING CONDITIONS

- LIGHTING SCHEME

An internal and external Lighting Scheme must be submitted to and approved in writing by the local planning authority. This will include, but not be limited to:

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- Existing onsite lighting must be reviewed and changed to more wildlife friendly lighting (as per the latest guidelines referred to below).
 - The results of an onsite ambient light level survey for use as a baseline
 - Both lux horizontal and lux vertical illuminance contour plans down to a lux level of 0.2 covering the site and the wider landholding
 - Cross referencing of the contour plans with the presence onsite of protected species impacted by artificial light at night.
 - Details of colour temperature and model of lighting used.
 - An environmental lighting impact assessment against conservation requirements for nocturnal and crepuscular species including details of when the lighting will be in operation (restrictions will be required)
 - Details of lighting to be used both during construction and operation. The lighting shall be installed and retained as approved during construction and operation
 - The survey and plans must be undertaken and produced by a competent lighting professional. The lighting plan must demonstrate dark zones at the boundaries and across/through the site. Any known roosts and wildlife boxes must not be illuminated (for example bat, bird, invertebrate) and there must be dark routes to allow barrier-free access to the boxes. The Lighting Scheme must conform to the latest guidance (see below) and any updates to these documents or further guidance regarding lighting that may be published subsequently.
 - 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/>
 - Good Practice Guidance: Planning for the Conservation and Enhancement of Dark Skies in Wales. <https://www.gov.wales/sites/default/files/publications/2025-02/dark-skies-guidance.pdf>

- INVASIVE NON-NATIVE SPECIES (INNS)

A long-term (for the lifetime of the development) Invasive Non-Native Species (INNS) Method Strategy must be produced by an invasive species specialist and be submitted to and approved in writing by the local planning authority.

- COMPLIANCE

Evidence that ecological measures have been installed, created, implemented etc will be required on completion of the development. This evidence must be submitted to and approved in writing by the local planning authority.
