

# INTERNAL MEMORANDUM

To: David Cross  
From: Matt Davies (Ecologist)  
Ext: 5278  
Memo number: 3  
Date of previous memo: 10/10/2025  
Date: 10/11/2025

**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**

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## 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 **V2.1**. Dated: **05/10/2025**.
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: 19<sup>th</sup> November 2024.
5. The Hoover Factory, Merthyr Tydfil. Tree Constraints Plan *prepared by* Treescene Arboricultural Consultants *on behalf of* Walters.
6. Hoover Site, Merthyr Tydfil. Bat Survey Report. Document Number: K001 – *Bat Report – V1.2* *prepared by* Sylvan Ecology Ltd *on behalf of* Walters. Issue Date: 29/09/2025.
7. Hoover Site, Merthyr Tydfil. Bat Survey Report. Document Number: K001 – *Bat Activity Report – V1.1* *prepared by* Sylvan Ecology Ltd *on behalf of* Walters. Issue Date: 29/09/2025.
8. Hoover Site, Merthyr Tydfil. Bat Tree Survey Report. Document Number: K001 – *Bat Tree Report – V1.3* *prepared by* Sylvan Ecology Ltd *on behalf of* Walters. **Issue Date: 30/10/2025**.

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## COMMENTS

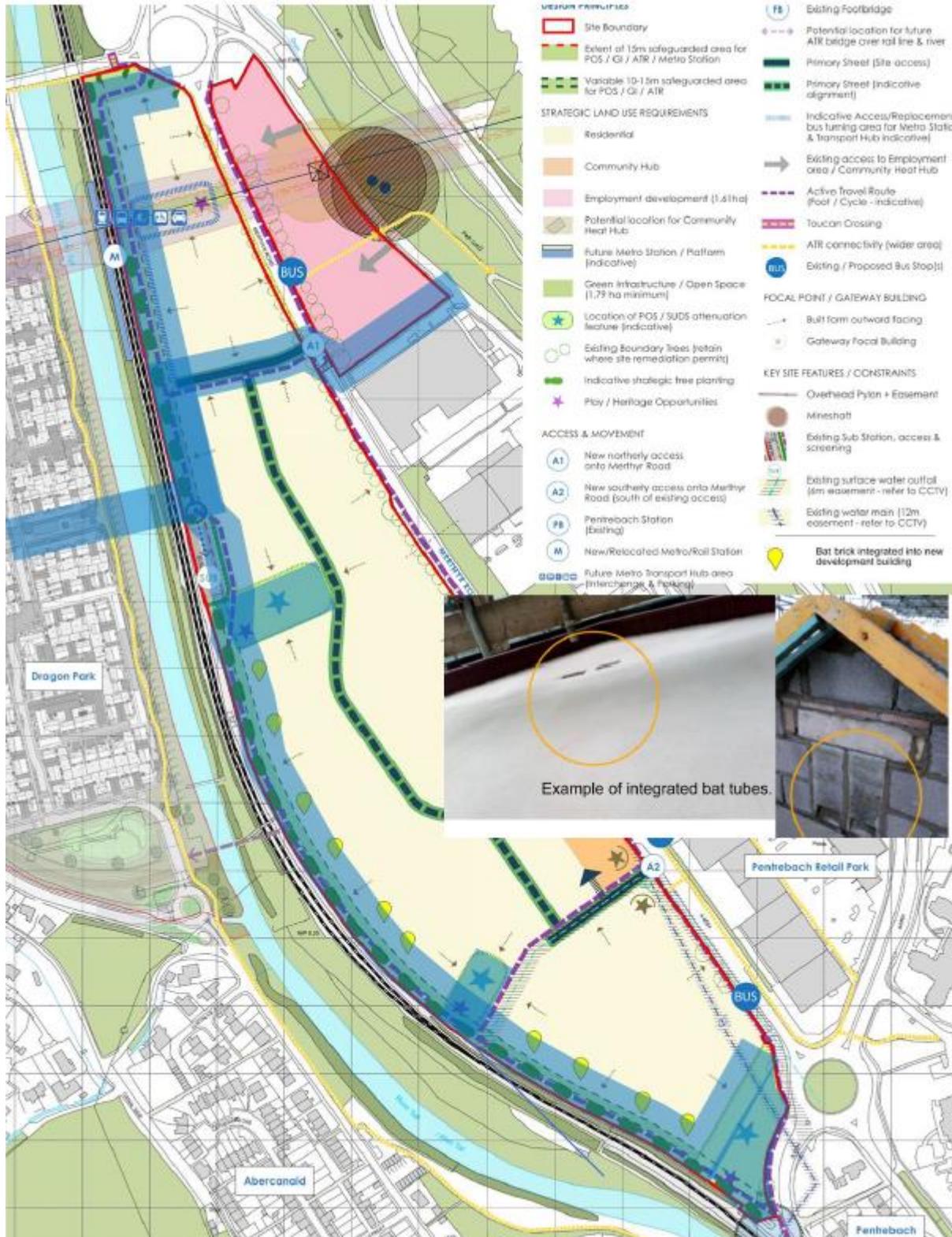
### **Document 6 – Bat Report**

This report recommends a total of x10 integrated bat boxes facing boundary habitat. This is a low number given the number of properties proposed (up to 441). All houses in the areas highlighted (in blue) in the plan below should have an integrated bat or a bird box as appropriate.

NB these are not the only areas that will need to be kept dark, simply those dark areas within/alongside which there will need to be wildlife provision in the form of bat and bird boxes.

All site boundaries where there is habitat will also need to be dark within the lighting scheme along with any areas of habitat within the site.

The plan below not only includes a suggestion for a west-east dark corridor running right across the Hoover site, but also how this will link up to the west-east dark corridor already agreed for the adjacent Dragon Park development to the west of the Hoover site.



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## Document 8 – Bat Tree Report

Page 1 includes incorrect information referring, as it does, to TATA Steelworks in Pontarddulais. Please could all incorrect references within the report be amended?

The tree survey is comprehensive and acceptable, with the following points of clarification and questions:

1. Some trees, where there is the possibility that ivy is obscuring other features, have been categorised as PRF-I. However, should not the suitability of these trees be categorised as FAR (Further Assessment Required)?
2. Page 30 of Document 8 states “*To mitigate the loss of PRF-I trees, a total of nine new roosting locations will be added to the final site design. This will be done through integrating bat bricks into the new buildings on site.*”

Current guidelines state that appropriate compensation for all PRF-Is should be provided *in advance of* impacts and a PWMS for works.

Is this possible if using integrated bat bricks as compensation? If not, bat boxes should also be added to onsite trees in compensation for the loss of the PRF-I bat roosting opportunities prior to the impacts and the PWMS for works.

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### General issues

- Document 2 – as a survey was undertaken in October were any grassland fungi noted onsite?

### This question still needs to be answered.

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#### ***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*) in addition to all other boundaries with habitat or other areas of habitat within the site. The Lighting Scheme must conform to the latest guidance for wildlife-friendly lighting 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 Darks Skies in Wales. <https://www.gov.wales/sites/default/files/publications/2025-02/dark-skies-guidance.pdf>

The Lighting scheme will need to include:

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- 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.

**The Lighting scheme document can be secured via an appropriately-worded pre-commencement planning condition.**

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***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>

As previously stated the OUTLINE GIS (Document 3) is largely acceptable **with the caveats above, including the required submission of an outline LHES. An updated OUTLINE GIS and OUTLINE LHES have not been submitted, but are required.**

#### ***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

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PWMS shall be implemented in full according to the specified timescales, unless otherwise agreed in writing by the local planning authority.

**The commissioned ecologists (Sylvan Ecology) have stated that the PWMS has been produced for all relevant constraints onsite. This information has not yet been received, but can be secured via an appropriately-worded pre-commencement planning condition.**

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### ***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 (e.g., bat boxes, bird boxes, hibernacula, gaps in boundaries for hedgehogs, invertebrate coils etc) 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. This information can be secured via an appropriately-worded pre-commencement planning condition.**

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### ***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. This document can be secured via an appropriately-worded pre-commencement planning condition.**

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### ***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.

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### ***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.

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The commissioned ecologists (Sylvan Ecology) have stated that a CEMP-B is being completed and will be submitted. This information has not yet been received, but can be secured via an appropriately-worded pre-commencement planning condition.

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*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 onsite dark habitat routes should be designed to link to those proposed for the neighbouring Dragon Parc development to the west of the site.**

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