
From: South East Planning <southeastplanning@cyfoethnaturiolcymru.gov.uk>
Sent: 25 April 2023 12:10
To: Planning DC
Subject: P/22/0315 - Pandy Farm (Minor) V2 - NRW Response NRW:06550357
Attachments: P_22_0315 Pandy Farm V2.pdf

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Annwyl Huw

Amgaeaf ein hymateb i'r cais uchod, ac os oes gennych unrhyw ymholiadau, mae croeso i chi gysylltu â mi.

Cofion Cynnes

Dear Huw

Please find attached our response to the above application, if you have any queries please do not hesitate to contact me.

Kind Regards
Claire McCorkindale

Tîm Cynllunio Datblygu / Development Planning Team
Cyfoeth Naturiol Cymru / Natural Resources Wales

Ffôn / Tel: 03000 653098
www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy / Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi / Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

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25/04/2023

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: Re-roofing of the south stables, coach house stables and coach house, to relay the slate roof, provide new ridge details, eaves boards and gutters. Insert conservation rooflights

LLEOLIAD / LOCATION: Pandy Farm, Brecon Road, Merthyr Tydfil CF47 8PA

Thank you for re-consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 3 and 11 April 2023.

We continue to have concerns with the application as submitted. We recommend you should only grant planning permission having considered the advice under the heading European Protected Species Licence.

We also advise that the documents listed in bold below are included in the approved plans and documents condition on the decision notice. Please note that without the inclusion of these documents in that condition we would object to this planning application.

European Protected Species (Bats)

We note the submission of the following further/revised information:

- **'Pandy Farm, Merthyr Tydfil. Bat Report (Report Ref 1703/02e)' by Ecology Planning dated 17/4/23;**
- **Drawing 3-0115 'Pandy Farm. Proposed Elevations 01 (Rev B)' by Rural Office dated 27/3/23;**
- **Drawing 3-0116 'Pandy Farm. Proposed Elevations 02 (Rev B)' by Rural Office dated 23/3/23;**
- **Drawing 3-0122 'Pandy Farm. Listing Plan' by Rural Office dated 27/3/23.**

We have considered these alongside the following previously submitted information:

- Drawing 3-0118 '*Pandy Farm. Proposed Details Sheet 01*' by Rural Office dated 26/10/22;
- Drawing 3-0119 '*Pandy Farm. Proposed Details Sheet 02*' by Rural Office dated 26/10/22;

In response to the queries we previously raised, we welcome that the information provides the following clarification:

- The results of DNA analysis of droppings in building G appear to show occasional use of the building by brown long-eared bats (non-breeding roost); and
- Confirm the listed status of the buildings present at the farmstead, including that building E is grade II listed.

In view of this additional information, we consider that there should not be a detriment to the maintenance of the favourable conservation status of the bat species present, providing that the bat mitigation measures set out in section 5 and Appendix 3 of the above bat report above are implemented.

European Protected Species Licence

We refer to the comments in our letter of 5 January 2023, reference CAS-205007-S1D2 regarding an EPS licence and the use of breathable roofing membrane.

We note the agent's response that bats will not have access to breathable roofing membrane and the content of paras 5.33-5.36 (inclusive) in the bat report. However, the Proposed Details drawings 3-0118 and 3-0119 show breathable membrane above bitumen membrane in areas of the roof where, according to the Proposed Elevation drawings 3-0115 and 3-0116, lead bat slates will be provided to allow bats access into the roof.

We advise that this matter, and the inconsistency between the drawings, will need to be resolved at the EPS licensing stage unless the LPA are of the view that the Proposed Details drawings 3-0118 and 3-0119 need to be included in the list of the approved documents and drawings. **If they do, then the drawings will need to be amended at this stage and NRW re-consulted on amended drawings.** The drawings will clearly need to show which is the breathable membrane and which is the bitumen membrane, and how bats will be prevented from having access to the breathable membrane.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Claire McCorkindale

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning

Cyfoeth Naturiol Cymru / Natural Resources Wales