

INTERNAL MEMORANDUM

Date: 07/05/2026

Planning Application Ref: P2026/0103

**1B Broomhill
BIODIVERSITY COMMENTS**

The Countryside and Wildlife Team, in responding to the above application, provides the following substantive response:

No comment	☐
No objection (subject to any specified conditions below)	☐
Concerns have been identified (see below for how those concerns can be addressed by the applicant)	☒
Objection – on the grounds set out below	☐

Comments and recommendations:**Surveys and other requirements needed prior to determination:**

Prior to determination of the application the following information is required to be submitted to inform the decision:

- Biodiversity Enhancements

As set out in Planning Policy Wales (12), all developments must result in a net benefit for biodiversity. Therefore, we need details of the habitats on the site prior to clearance in order for the applicant to demonstrate NBB.

PPW 12

6.4.16 Potential applicants should not conduct any pre-emptive site clearance works before submitting a planning application as this can make it more difficult for a development proposal to secure a net benefit for biodiversity. Where a site has been cleared prior to development its biodiversity value should be deemed to have been as it was before any site investigations or clearance took place. A net benefit for biodiversity must be achieved from that point. Habitat status can be established through evidence remaining on site and local desk-based assessments (planning authorities must ensure that they have access to these data sources). In such cases, habitat status will be presumed to be good in the absence of any evidence to the contrary.

Conditions:

If the application is to be granted it is recommended that the following be conditioned into the permission:

Biodiversity Consultation Response

- None

Informatives:

If the application is to be granted it is recommended that the following informative notes be included in the permission:

- None

The Authority must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions, under the Environment (Wales) Act 2016. It is therefore essential that the above recommendations for the conservation of biodiversity be followed to ensure that the Planning Authority complies with this statutory requirement along with the adopted guidance in the Biodiversity supplementary planning guidance and TAN 5 (2009).

If you require further clarification of any of the above points please contact Laura Palmer.

A handwritten signature in blue ink, appearing to read 'Laura Palmer'.

Laura Palmer MCIEEM

Senior Ecologist