

INTERNAL MEMORANDUM

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

Memo number: 1
Date of previous memo: -
Date: 02/09/2024

SUBJECT: P/24/0199 | Proposed change of use from community hall (D2 Use Class) to a residential bungalow | Former Bontnewydd Hall Bontnewydd Terrace Trelewis CF46 6AB

SITE DESCRIPTION

Disused community hall adjacent to well-connected woodland habitat.

DESIGNATED SITES WITHIN 500M OF THE APPLICATION SITE

- ✓ Sites of Importance for Nature Conservation (SINC): closest, Afon Bargoed Taf, c.176m
- ✓ Ancient Semi Natural Woodland (ASNW): x8
- ✓ Ancient Woodland Site of Unknown Category (AWSUC): x3

PRIORITY AND PROTECTED SPECIES WITHIN 500M OF THE APPLICATION SITE

- ✓ Birds (including Schedule 1¹ and Section 7² species);
- ✓ Fish (including Section 7² species);
- ✓ Invertebrates (including Section 7² species)
 - ✓ Marsh fritillary butterfly (Section 7² species), closest record c.1059 from site;
- ✓ Lichens (including Section 7² species);
- ✓ Mammals
 - ✓ Bats (European protected species³; some Section 7² species) - closest roost record for unidentified bat species, c.138m from site);
 - ✓ Otter (European protected species³; Section 7² species);
 - ✓ Hedgehog (Section 7² species);
 - ✓ Badger
- ✓ Reptiles (Section 7² species);
- ✓ Amphibians
 - from site);
 - ✓ Common toad (Section 7² species);
- ✓ Vascular plants (including Section 7² species).

DOCUMENTS SUBMITTED related to ecology

1. Bontnewydd Hall, Bontnewydd Terrace, Trelewis, CF46 6AF. Bat Survey report prepared by Ecological Services Ltd on behalf of Merthyr Valley Homes. Version V1.0. Date: August 2024.
2. Bontnewydd Terrace, Trelewis. Proposed Elevations. Darwing No: LT2204.04.04, prepared by LeTrucco Design Architecture. Date: March 24.

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

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

COMMENTS

Habitat

Question: will any trees or other habitat be impacted by the proposed scheme?

Hibernation suitability

Document 1, page 15, para 10.4 – *“The buildings do not offer significant hibernation potential for bats. The external walls were sound with no visible apertures for bats preventing access into the wall structure. When considering the limited bat access points into the buildings, the hibernation use of the buildings is considered to be limited.”*

Document 1, page 3, para 2.1 – *“... There is likely to be a cavity wall in the building.”*

Document 1, page 6, para 6.3 – *“... There were apertures between the barge boards and the walls on the gable ends of the hall; apertures between the slates and the barge boards on the southern gable end of the hall; an aperture at the apex on the southern gable end of the hall ...”*

The features described in para 6.3 may allow bats access to the wall top and to the cavity (if present), providing a ‘non-classic’ hibernation opportunity. In addition, pipistrelles can be found roosting individually in more exposed/thermally unstable locations (National Trust 2018)⁴ and so the gaps behind the bargeboards might also for example present opportunities for hibernation.

On this basis, as a precautionary approach, any works that would impact hibernating bats (if present) must be undertaken outside of the bat hibernation season. Please could the report be amended to reflect this?

Lighting

An internal and external lighting plan is required, which must conform to <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

Enhancements

Document 1, page 16, para 11.1 –

“To comply with the Environment (Wales) Act 2016, ecological gain will be included into the scope of works. All enhancements will need to be added to architectural drawings. This will consist of:

- ***3 Raised Ridge Tiles and a self contained ridge roosting area*** for bats along the entire ridge line of the new roof.
- ***2 Vivara Pro WoodStone Sparrow Nest Boxes***, built integral into the block work. Care must be taken not to obstruct the entrance holes.”

Document 2 – this features the following:

- 1 PROPOSED INTEGRATED FIXED SWIFT BOX <https://www.birdbrickhouses.co.uk/brick-nesting-boxes/nesting-boxes/>
- 1 PROPOSED INTEGRATED BAT BOXES - IBSTOCK TYPE B OR SIMILAR <https://www.nhbs.com/ibstock-enclosed-bat-box-b>

⁴ National Trust (2018) Home to roost – largest hibernation of pipistrelle bats recorded at Seaton Delaval Hall. National Trust press release, as cited on page 53 of Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

The information does not match. Both documents need to be consistent – please could amendments be made?

NB If the enhancements as set out in Document 1 are to be used, the ‘English Nature Ridge Tile Access’ diagram needs better resolution. At present it is too blurry to be clearly viewed and understood.

If the enhancements as set out in Document 2 are to be used, it is likely that the swift box will need to be replaced by an integrated sparrow terrace (e.g. <https://www.birdbrickhouses.co.uk/products/bird-brick-houses/>). Swift boxes need to be erected at a height of at least 5m. The drawings seem to indicate this would not be achievable on this building.

Planning Policy Wales 12 (PPW12)

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 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 (which will be further refined in the consolidated version of 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 regarding PPW12, see here - [Planning Policy Wales - Edition 12 \(gov.wales\)](https://gov.wales/planning-policy-wales-edition-12)