

INTERNAL MEMORANDUM

To: Rebecca Owens
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 2

Date of previous memo: 28/03/2023

Date: 18/08/2023

SUBJECT: P/23/0075 | Removal of single storey extensions to side and rear, erection of two storey rear extension, new pitched roof over extension and existing dwelling with raised ridge line to provide loft accommodation with two front dormers, two new chimneys, single storey rear extension and other external alterations and new garage in garden | Waunfach House Winch Fawr Road Heolgerrig Merthyr Tydfil CF48 1TF

House and shed in overgrown plot, adjacent to scrub/woodland habitat. There is nearby garden habitat, scrub, woodland, grassland and stream habitat.

Document submitted in support of the above application:

1. Waunfach House, Winchfawr Road, Heolgerrig, Merthyr Tydfil. Preliminary Ecological Appraisal and Bat Surveys 2023, V1. Dated 07/08/2023. East Ecology.

Questions and comments

Page 6 – *‘Due to the lack of bat evidence internally and lack of potential crevices and the absence of a fly-in entrance, no static detectors were placed internally.’*

Photo 1 on page 23 shows a missing window pane – the photo caption states *‘Windowpane opened for access but usually covered by board.’* What access was facilitated by removal of the board?

Photo 2 on page 23 shows a lean-to extension with apparent open access. Is this the case?

There are gaps internally between the rafters and the slates, created by, and measuring the depth of, the purlins. There are also a number of open fireplaces/chimneys. These are potential roost features found internally. Were the chimneys checked during the surveys – they are not mentioned within the report. The photographs also show exposed stonework – were there crevices between the stones?

Page 13 – Intact species poor hedge – the eastern section has x5 woody native species. This should therefore be classed as species-rich.

Page 15 – External – no reference to the raised ridge tile toward the southeast apex (exit point for bat during dusk emergence survey) ... unless this is the small gap mentioned? Also, the exit point is not highlighted on a plan or on one of the site photographs. Please can this be added into the report?

Page 17 – Birds – *‘No survey for birds is thought to be necessary as no habitat suitable for them will be affected, as such no impacts upon them are anticipated unless the monkey puzzle tree in which sparrow appear to be nesting is taken down.’*

Does the building have suitability for nesting birds? NB were the chimneys considered as potentially suitable for barn owl and investigated with this in mind?

Page 17 – Bats – *‘The surrounding area was however less suitable for bats being very well lit by street lighting.’*

NB there are built up, well lit areas of Merthyr where more light averse bat species (including horseshoe spp) have been recorded. So, the illumination of the area would not necessarily preclude the presence of other more light averse species.

Page 17 – Bats – *‘The building was not thought to be suitable for winter hibernation due to the stone walls with no crevices or cavity.’*

The house has accessible wall tops and chimneys, so there is hibernation suitability. Works will be avoided in the winter period and a bat boxes will be integrated into the fabric of the modified building as compensation for lost bat hibernation opportunities. For example: <https://www.greenandblue.co.uk/products/bat-block-bat-brick> (or equivalent) and will face north. The report will be amended to reflect this.

All boundary features (hedges and trees) will be kept dark and there will be dark routes to and from proposed bat features (ridge access and bat box). A lighting plan will be required for any proposed onsite lighting demonstrating compliance with the following guidelines – [Guidance Note 8 Bats and Artificial Lighting | Institution of Lighting Professionals \(theilp.org.uk\)](https://www.theilp.org.uk/Guidance%20Note%208%20Bats%20and%20Artificial%20Lighting). External and internal lighting will be included.

The lighting plan will preferably be provided prior to determination. Alternatively, if required, it can be the subject of an appropriately worded planning condition, which will need written approval from the LPA ecologist in order to be discharged.

Page 18 – Biodiversity Enhancement Plan (BEP) – will include full details of all mitigation and enhancement measures, including, but not limited to, the following:

1. Supplementary planting in hedges – replacement of non-natives with native species;
2. Bat features (ridge access and bat box);
3. Bird boxes;
4. Meadow area, with suitability for reptiles and amphibians.

Management measures will also be included within the BEP.

All enhancement features will be clearly marked on architect’s plans, which will be submitted *prior to determination* for written approval by the LPA ecologist.

The BEP will preferably be provided prior to determination. Alternatively, if required, it can be the subject of an appropriately worded planning condition, which will need written approval from the LPA ecologist in order to be discharged.

As the house has been identified as a roost, a bat licence from NRW will be required in order to undertake the works within the law. The following advisory note will be added to the decision notice if planning is granted:

Warning: A European Protected Species (EPS) Licence is required for this development. This planning permission does not provide consent to undertake works that require an EPS licence.

It is an offence to deliberately kill, injure, capture or disturb a bat or to recklessly damage or destroy their breeding sites or resting places. If found guilty of any offences, you could be sent to prison for up to 6 months and/or receive an unlimited fine. To undertake works within the law, you can obtain further information on the need for a licence from Natural Resources Wales on 0300 065 3000 or at <https://naturalresources.wales/permits-and-permissions/species-licensing/apply-for-a-protected-species-licence/bat-licences/?lang=en>

A further advisory note regarding birds will be added to the decision notice.

NESTING BIRDS

All birds, their nests and eggs are protected by law under the Wildlife and Countryside Act 1981 (as amended) while they are breeding.

If works to any trees, hedgerows and/or other nesting bird habitat (including buildings with suitable features) are to be undertaken, they will take place outside of the bird nesting season. If the works must be undertaken during the nesting season (generally from 1st March until 31st August, although birds are known to nest outside of these dates in suitable conditions), a breeding bird survey will be required and must be carried out by a suitably qualified ecologist. Any active nests identified will be protected until the young have fledged.

Where a Schedule 1 species (as defined in the Wildlife and Countryside Act - <https://www.legislation.gov.uk/ukpga/1981/69/schedule/1> is involved, compensation for impacts, e.g., loss of nesting sites, will be devised and implemented.
