

INTERNAL MEMORANDUM

To: Emma Watkins
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1
Date of previous memo: -
Date: 24/10/2023

SUBJECT: P/23/0225 | Demolition of 2 wings of Pen Y Dre Comprehensive school, redevelopment to provide a modern facility and associated works | Pen Y Dre High School Goitre Lane Gurnos Merthyr Tydfil CF47 9BY

Document submitted in support of the above application:

1. Bat Survey: Pen-y-Dre Comprehensive School, Gurnos Estate, Merthyr Tydfil, CF47 9BY. Version 3.0. September 2023. Ecological Services Ltd

COMMENTS:

The following excerpts from the Document 1 are relevant to the remaining requirements:

- 9.14 **A detailed external lighting plan will be required** to minimise any external light disturbance to the bats using the building and surrounding area. Any new external lighting must not directly illuminate any roosting location. Any external lighting must be downward angled and activated by passive infrared. The lights will be baffled to avoid any unnecessary lateral or vertical light spill. The lux levels of any external lights will be as low as required for health and safety purposes.
- 9.15 Once the mitigation and enhancements measures for biodiversity have been agreed between relevant parties, **this must be added to the architectural drawings prior to submission of the Planning Application or Listed Building Consent.**
- 9.16 Any new biodiversity mitigation or enhancement features must not be directly illuminated and **a dark corridor must be established** allowing undisturbed access for any bat away from the site.
- 9.17 As of September 2023, it is proposed to demolish two sections of the school building. There will be no destruction of the 2022 identified bat roost location. Given the proximity of the proposed demolition works away from the confirmed bat roost locations it is considered unlikely that disturbance of the roost location will be experienced.
- 9.18 **A method statement** and direct ecological supervision of the two sections proposed to be demolished will be required to ensure that no protected species are impacted upon by the demolition works.

The following is needed prior to determination:

1. Details of the proposed mitigation and enhancement measures, with specifications and hyperlinks to suitable products (where relevant). These must be clearly marked on all relevant architect's drawings.
2. A detailed lighting plan – all proposed lighting will need to conform to the following guidelines - <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>. Dark areas and corridors will need to be demonstrated within the plan.

3. A bat method statement for the demolition of the building sections earmarked for demolition (this will need to include direct ecological supervision).
4. As a result of a letter to Local Authority Heads of Planning from Julie James, Minister for Climate Change, Chapter 6 of the upcoming Planning Policy Wales 12 has been pre-emptively published and so has now come into force with immediate effect. Chapter 6 states the following:
'A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants.'
The commissioned ecologist should take this into account within their report.