

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 2
Date: 13/01/2021

P/20/0219 | CONVERSION OF BUILDING TO OFFICES WITH ASSOCIATED INTERNAL AND EXTERNAL RENOVATION WORKS. CREATION OF A BAT ROOST STRUCTURE AND THE ERECTION OF A NEW EXTENSION WITH A NEW PEDESTRIAN ACCESS AND BRIDGED WALKWAY. CONSTRUCTION OF A NEW ROOF WITH DORMER WINDOWS AND ROOF LIGHTS TO PROVIDE ADDITIONAL ACCOMMODATION. THE CONSTRUCTION OF A NEW CAR PARK AND CYCLE STORE WITH ACCESS FROM PARK TERRACE AND OTHER ASSOCIATED WORKS. | FORMER YMCA BUILDING PONTMORLAIS WEST MERTHYR TYDFIL CF47 8UT

The following documents have been submitted in support of this application:

- Ecological Impact Assessment. Former YMCA in Merthyr Tydfil. Merthyr Tydfil County Borough Council (Ref WWE19143 BAS REV B; dated 07/01/2021)

Comments (previous comments not yet dealt with in black; additional comments in green):

1. A lighting plan demonstrating consideration for roosting, commuting and foraging bats is required prior to planning determination. The lighting will conform to *(2018) Guidance Note 08/18. Bats and artificial lighting in the UK. Bats and the Built Environment series. Bat Conservation Trust and Institute of Lighting Professionals - <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>* as set out in Para 5.14 of the EclA. This will be necessary for licensing of the works.
2. Para 5.10 refers to the use of bitumen felt. A statement is also necessary regarding treatment for timbers, if relevant (e.g., where treatment of existing timbers is required in-situ, only products suitable for use around bats will be used, as specified by Natural England and DEFRA at <https://www.gov.uk/guidance/bat-roosts-use-of-chemical-pest-control-products-and-timber-treatments-in-or-near-them>).
Para 5.11 has been added – what is the LBW? I assume ‘Licenced Bat Worker’? Not a recognised term/acronym in Wales. A link to the acceptable treatments will need to be added into the report as above.
3. Paras 5.16 and 5.17 deal with site enhancements. These need to be specified within the report and incorporated into all relevant drawings for the development.
Para 5.20 now sets out the bat and bird boxes to be installed as enhancement for the site. As previously required, the positions of these boxes need to be incorporated into all relevant drawings for the development (similarly the compensation bird boxes).
4. There is enhancement suggested for nesting birds, but no compensation for the loss of nesting opportunities.

It need to be made clearer that there will be x4 bird boxes in total installed:

- x2 bird boxes as compensation for lost nesting opportunities (NB the bird box specification/type needs to be added for these);

- x2 boxes installed as enhancement.
5. The Bat Mitigation Plan in Appendix V is not in focus and cannot be easily read. This needs amendment.
- This is still the case – can they be supplied to me separately perhaps? I think a plan of the bat structure alone, to show more detail would be very helpful.
6. It is not clear where the access points are on the bat house for each species? This needs clarification, both in the text and on the drawings. Point 11 on the Ecology Mitigation document refers to the access point for lesser horseshoe bat. Where are the access points for brown long-eared bat and common pipistrelle or is it proposed they use a common access point?
- Some further clarification has been provided in the text, but the text within the report does not correspond with the Bat Mitigation Plan (see comments for Point 5 regarding the lack of focus and the suggestion for a more detailed close-up plan). For example:
- the text mentions x3 Kent-style bat boxes and the drawing appears to show x8?
 - the text specifies x1 entrance and the drawing appears to show x2?
 - the text refers to the bat structure having a south-facing pitch to maximise solar gain and to there being a loft, but the structure has a flat roof and there is no loft space as such?
7. In addition to the comments above in Point 6, the plan in the Appendix (GA 355 – Roof Plan as proposed) shows ridge access for bats, however, this is not included anywhere within the report text.
8. When the points above have been addressed, given the building is a roost for lesser horseshoe bats and a roost for 3 different species, **Natural Resources Wales must be consulted prior to determination of planning.**
9. The following informative must be provided on the decision notice (should planning permission be 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 capture, kill or disturb EPS or to recklessly damage or destroy their breeding sites or resting places. If found guilty of any of any offences, you could be sent to prison for up to 6 months and/or receive an unlimited fine.

To undertake the 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/european-protected-species-licensing/information-on-european-protected-species-licensing/?lang=en>

NB as from 01 March 2018, NRW have introduced a new process in their EPS Licensing procedure that will automatically issue a copy of the EPS Licence that has been granted, to the generic planning mailbox of the relevant LPA.

When this is received it should be forwarded to the LPA Ecologist (Matt Davies).