

INTERNAL MEMORANDUM

To: Huw Roberts
From: Matt Davies Ecologist
Ext: 5278
Memo number: 5
Date: 25/09/2020

P/20/0199 | RESIDENTIAL DEVELOPMENT CONSISTING OF THE CONVERSION AND EXTENSION TO A LISTED BUILDING TO CREATE 7 APARTMENTS AND A DWELLING, CONSTRUCTION OF 62 DWELLINGS (INCLUDING 31 AFFORDABLE UNITS), THE DEMOLITION OF EXISTING BUILDINGS, LANDSCAPING, RE-PROFILING OF LAND, ALTERATIONS TO THE EXISTING ACCESS AND OTHER ASSOCIATED WORKS | FORMER ST TYDFILS HOSPITAL UPPER THOMAS STREET MERTHYR TYDFIL CF47 0SJ

See table overleaf for comments:

Column 1: comments previously made regarding this site as part of Pre-Application advice (PA/190040_02) in an internal memo dated 13/08/2019.

Column 2: comments from previous memo (#3).

Column 3: outcomes from meeting – column 3 NB Onsite meeting held with Mr Steve Jarvis (applicant) and Ms Jess Dangerfield (David Clements Ecology (DCE) Ltd) on 25th September 2020.

Column 4: comments (in bold) following the submission of amended documents following further survey work:

- Bat survey report_v2. St Tydfil's Hospital, Merthyr Tydfil. David Clements Ecology Ltd. October 2020.
- Reptile Mitigation Strategy_v1.1. St Tydfil's Hospital, Merthyr Tydfil. David Clements Ecology Ltd. October 2020.

Recommendation	1	2	3	4
	Comment from pre-App advice (13/08/19)	Comments from memo #3 (02/09/20)	Outcomes following meeting (25/09/20)	Comments
5.1 Ecological Enrichment	I agree with the recommendations for enhancement of the site here. I would include the addition of a line of 'stepping stone' trees cross the centre of the site in order to link the trees in St Tydfil's Park to the woodland adjacent to the eastern boundary of the site.	The LEMP drawing shows a number of trees that would act as stepping-stone habitat spanning the site and linking west to east. NB further bat survey work is required (see points below) and the results of this survey work may require an amendment to the planting scheme to benefit any resident onsite bats. The LEMP does not provide information regarding planting for the amenity grassland areas – I would recommend the following grass mix (or similar) is used: https://wildseed.co.uk/mixtures/view/56 A full 5-year maintenance and management plan is required. The LEMP should also be assessed by the MTCBC Landscape Architect, Tom Bramley.	The LEMP was not discussed – previous comments still apply ... <i>'The LEMP does not provide information regarding planting for the amenity grassland areas – I would recommend the following grass mix (or similar) is used: https://wildseed.co.uk/mixtures/view/56</i> <i>A full 5-year maintenance and management plan is required.</i> <i>The LEMP should also be assessed by the MTCBC Landscape Architect, Tom Bramley.'</i>	Same comments as Column 3
5.2 Grassland	I agree with the comments here.	No further comment	No further comment	No further comment

5.3 Bats	In terms of bats, the report relies largely on the results of a previous bat survey from 2014 by Rob Colley. This survey is out of date and updated survey work is required for this application. The authors of the PEA recommend a Preliminary Roost Assessment of the onsite buildings. I agree but would go further and say that bat activity surveys will be required and that these surveys will be supplemented by automated overnight surveys. There is a record for a basement bat roost likely for lesser horseshoe bats from 2011. The site therefore has hibernation suitability for bats and appropriate survey work is required. Onsite trees may have suitability for roosting	Bat activity surveys were undertaken in May and June 2020. These surveys were undertaken at the correct time of the year and under appropriate weather conditions. The results of the bat activity surveys are therefore valid. My previous comments from August 2019 specified that the bat activities were to be supplemented by automated overnight surveys. Given the onsite record for a basement bat roost (droppings characteristic of lesser horseshoe bats observed), I would have expected that automated/static activity surveys to have been undertaken within the interior of the onsite buildings and within any accessible basement locations. These surveys would need to be undertaken in the bat activity season in 2021, over 5 consecutive nights under suitable weather conditions. NB there is another known nearby lesser horseshoe roost (not yet currently found in the records from SEWBrEC (within the former YMCA building – c.100m to the west of the site). Do the buildings have suitability for swarming? If so, automated/static activity surveys should also be undertaken in September or October this year. Previous comments also required surveys during the hibernation season (NB the	<u>Buildings</u> x3 static detectors have now been deployed at the site since Monday 21st September 2020. x2 within one of the existing onsite buildings and x1 within an onsite underground location to the north. These will be left in situ until 5 nights of data have been collected under suitable conditions (e.g., no rain). A further static detector will be deployed on 26th September in another building, this will again remain in place until 5 nights of data have been collected under suitable conditions. In addition, a dusk survey will be undertaken with 2x surveyors to detect any bat swarming behaviour at the site. Hibernation use of the buildings cannot be ascertained at this time of year (as previously stated in my e-mail dated 17/09/20). <u>Trees</u> The issue of the discrepancy between the tree report and the ecological report in terms of the numbers of trees to be removed has been largely resolved. Most of the trees recommended for removal within the tree report were in fact off site. However, one onsite tree for removal was identified that had not been previously considered. This had potential	The results of the further bat survey work have been added into the latest report (version detailed above). NB Hibernation survey work has not been undertaken due to health and safety concerns. The report is acceptable, with the following caveats: ○ The report recommends a series of bat and bird boxes. The numbers and types of boxes need to be provided. In addition, para 5.1.7 recommends an enhancement feature for horseshoe bats. This is appropriate given that hibernation surveys have not been undertaken. The position of the feature needs to be specified. ○ In an e-mail from 16.10.20 a proposed site plan was submitted showing bat and bird box positions. Following consideration of the plan, further bat and bird boxes were requested (in an e-mail dated 19.10.20). ○ All the above features will be incorporated into relevant drawings/plans for the application and cross referenced within the bat report. NB gaps in fences for hedgehogs (para 5.3.8 of report) also need to be marked on the plans. ○ A compliance check will be undertaken by the retained ecologist to check that all compensation/enhancement features have been satisfactorily installed. This should be referred to within the report. ○ As previously stated – a lighting plan is required with consideration for nocturnal species (including bats). Any onsite lighting
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	bats. These trees require a ground level assessment, which will inform whether further surveys are required. The final scheme design is needed for an assessment of the impact of the development on any identified onsite bat roosts. Mitigation, compensation and enhancement measures for bats is required (to be informed by the results of the bat survey work and the final scheme design).	bat survey states the buildings have suitability for hibernation). This survey work is required prior to the determination of planning. The report states that most of the onsite trees are to be retained, with only 4 mature trees to be removed to facilitate the development. However, the tree report recommends that 30+ trees are removed, 24 of which are mature or middle-aged specimens. Clarity is required regarding the number of trees to be removed and their suitability for roosting bats.	roost features and will be subject to a PRF inspection survey on the 26th September 2020. The tree will be climbed and the PRF investigated. The results and any relevant recommendations in relation to the static detector surveys and the PRF inspection survey will be added into the report.	must conform to the following guidance: https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/
5.4 Birds	Works should be undertaken outside of the bird breeding season. Bird boxes as compensation for lost nesting opportunities and as enhancement are appropriate, but there will need to be more specifics regarding type and	Details of the types of bird boxes to be erected are provided within the Bat Survey Report. The number of boxes is required and their positions shown on all relevant drawings for the application.	Still required.	Still required (see above for comments regarding bird boxes).

	positioning.			
Additional comment: reptiles	Whilst I agree that most of the site is clearly unsuitable for reptile species, the area of grassland to the east of the site has some suitability and I would recommend a simple reptile mitigation strategy should this section of habitat be impacted by the final scheme design.	A draft reptile clearance and mitigation strategy has been supplied. Comments below: • The ‘species deterrence’ measures are designed to encourage reptiles into woodland habitat, however, this is not really suitable habitat for reptiles. Given the robust nature of the other measures outlined within the strategy, this ‘species deterrence’ section is in my view not required and should be removed. • There is some confusion regarding the receptor area. The document states this is as ‘the southern-most portion of grassland present in the east of the site’. I am not sure where this is – more information is needed.	There was still some confusion regarding what suitable reptile habitat was to be removed and where reptiles would be translocated if discovered. This is to be resolved by DCE Ltd asap.	The amended reptile mitigation strategy is acceptable.