

INTERNAL MEMORANDUM

To: Kate Glover
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1
Date of previous memo: -
Date: 21/10/2024

SUBJECT: P/24/0161 | Installation of PV solar panels to roof | 97 High Street Merthyr Tydfil CF47 8UD

DOCUMENTS SUBMITTED IN SUPPORT OF THE ABOVE DOCUMENT

1. The Hairport, Castle Yard, High Street, Twynrodyn, Merthyr Tydfil, CF37 8UP. A Bat Survey Report produced by Little Wing Ecology. Report reference: LT216-BAS-24. Version 1. Dated: 08/10/2024.

COMMENTS

- Page 4, para 3.2.6. “While the western bargeboard presents a potential access to the roof void, no evidence has been recorded of bats occupying this space currently or historically and the **presence of a breathable membrane would deter roosting** in the void between the membrane and the slate.”

NB bats are not deterred from roosting where there is breathable membrane present but can becoming entangled in the filaments of breathable membranes resulting in mortality.

- Page 6, 3.9 Field Survey Details & Weather Conditions. The dusk emergence survey finished 1 hour and 14 minutes after sunset. Good practice guidelines specify that surveys should finish between 1.5 – 2 hours after sunset. Can a justification please be provided for this?
- Lighting - All lighting must conform to the following guidelines: <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>. No features suitable for roosting bats (including the proposed bat boxes offered as enhancement) will be directly illuminated and there will be dark routes from those features leading off site. This must be demonstrated.

The lighting scheme can be provided via an appropriately-worded pre-planning condition that must be submitted to and approved in writing by the local planning authority ecologist.

- Enhancements (x2 Beaumaris bat boxes) will be marked on all relevant architect drawings/plans/elevation. The model and hyperlink to the specification of the bat boxes will be stated on the drawings.
- 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 [GIS] 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 (included within 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.*

Although referred to in Document 1, a GIS has not been provided. A GIS and a long-term management plan (to include details of how the management will be funded) is required.

For further information, see here - [Planning Policy Wales - Edition 12 \(gov.wales\)](#)