

INTERNAL MEMORANDUM

To: Emma Watkins
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 3
Date of previous memo: 08/03/2023
Date: 21/07/2023

SUBJECT: P/23/0061 | Change of use of the first and second floors from offices and storage to 5 self-contained flats and storage, together with alterations to the roof and other associated external alterations | 126 High Street Merthyr Tydfil CF47 8BT

Further document submitted in support of the above application:

1. 126 and 126a High Street Merthyr Tydfil. Bat and Nesting Bird Survey Report. Revision 2.0. Date 20 July 2023. Acer Ecology.

COMMENTS:

The inclusion data was requested by the LPA ecologist – see memo #1.

Page 15, para 6.1. Low bat activity during a bat activity survey is not a justification for not purchasing biodiversity data. Best practice dictates that data is purchased at the outset (so prior to the PRA) to provide context for the site. For example, the building may already have been recorded as a roost, and without accessing the data this would be ruled out.

Page 13, para 4.3. As stated, there is suitability for hibernating bats within the building. Therefore, as a specific hibernation survey has not been undertaken, the possibility of hibernation use cannot be entirely ruled out. Using the precautionary principle the works to the building will be undertaken outside of the bat hibernation season and access to those areas suitable for hibernation will be maintained (preferred option) or a bat box with hibernation suitability will be erected on the building.

Document 2 will be amended to reflect this.

Page 16, para 6.4.1. This section refers to measures that 'could' be undertaken. If these measures are to be undertaken, they will need to be definite and the language changed, for example, to use 'will' instead of 'could'.

Similarly for, para 6.4.2 on the same page, the details need firming up. How many bat tubes, where will they be positioned, which elevation etc? Again, the language used needs to be definite – 'will' rather than 'may' or 'would'.

All ecological enhancement measures (for example, roof void provision, suitable access points (including for hibernation use), gaps behind fascias, soffit boxes, gutter plates etc, bat tubes) will be clearly marked on all relevant architects' plans and elevations for written approval by the LPA ecologist prior to determination.

Document 2, page 8, para 3.2.1. All ecological enhancement features as outlined above will be kept dark.

All lighting (internal and external) will conform to the following guidelines:

<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

Details will be required prior to determination.