

INTERNAL MEMORANDUM

To: Kate Glover
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 3
Date of previous memo: 01/05/2024
Date: 14/06/2024

SUBJECT: P/24/0063 | Change of use of former day nursery to offices and storage, raising of the roof alterations to the front elevation and rear first storey extension | Former Day Nursery Brewery Road Penydarren Merthyr Tydfil CF48 3BU

Documents submitted in support of the application:

1. Scoping Survey: Former Day Nursery, Brewery Road, Dowlais, Merthyr Tydfil CF48 3BU, produced by Ecological Services Ltd, instructed by Robert Hadley. Version V1.0. Dated April 2024.
2. Bat Survey: Former Day Nursery, Brewery Road, Dowlais, Merthyr Tydfil CF48 3BU, produced by Ecological Services Ltd, instructed by Robert Hadley. Version V2.0. Dated June 2024.

COMMENTS

Required amendments to Document 2

- *11.0 Proposed Enhancements, page 15:* as the roof is to be raised, can all boxes be integrated into the walls rather than surface-mounted?
- *11.0 Proposed Enhancements, page 15:* could there be a slight re-design to create a soffit space for the incorporation of a swift box (e.g., <https://www.nhbs.com/soffit-and-fascia-swift-box>). This may also help the aesthetics.
- *11.6 Proposed Enhancements, page 15:* “Breathable membrane is dangerous for bats, therefore it is essential that the detail contained in the adjacent drawing is followed exactly and is to be fitted under direct ecological supervision by a suitably qualified ecologist.”

NB the adjacent drawing is blurry and cannot be read – please supply a version with better resolution for evaluation.

Other requirements

- *11.15 Recommended Locations of Bat and Bird Enhancements, pages 17 and 18:* The drawings appear to have been marked up by the ecologist rather than the architect. An updated architect drawing is needed including the enhancement measures, with a new drawing number, revision code and date to avoid confusion and possible omission of ecological measures later during the construction process.

- NB the requirements within the box below in relation to PPW 12 are still needed.

Requirements

The commissioned ecologist must take new Planning Policy Wales (PPW 12), Chapter 6 into account where relevant to this application.

The main changes to 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 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 (which will be further refined in the consolidated version of 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.*

Planning Conditions

- The building has hibernation suitability particularly for pipistrelle species. Any works that would impact roosting bats will be undertaken outside of the bat hibernation period (November to February inclusive).
- No development shall take place (including ground works, vegetation clearance) until an internal and external Lighting Scheme has been submitted to and approved in writing by the local planning authority. The Lighting Scheme must conform to the latest guidance for wildlife-friendly lighting.

NB further conditions may be required following the receipt of the information requested in this memo.