

INTERNAL MEMORANDUM

To: David Cross
From: Ecologist
Ask for: Matt Davies
Ext: 5278
Memo number: 1
Date: 03rd July 2020

SUBJECT: P/19/0244: 40-42 HIGH STREET, MERTHYR TYDFIL, CF47 8DE.

(Proposed refurbishment to create 15 flats and 7 self-contained serviced units (holiday lets), together with new shop front, third floor rear extension and associated bike shed and bin store).

A Bat Survey Report (I & G Ecological Consulting dated 27/06/20) was submitted in support of this planning application.'

Comments regarding this report:

1. No Bat and Roof Nesting Bird data was supplied within the report and this has been justified due to the small size, low predicted impact and nature of the development. This approach is said to be consistent with CIEEM Guidelines for Accessing and Using Biodiversity Data 2016. However, the guidelines state that where no data is deemed to be appropriate, this should be agreed with the LPA prior to preparation of the survey report. In addition, the guidelines say that the requirement for data is judged on a case-by case basis and a search may still be necessary even if the development is small or low impact.

In cases such as this, it is my view that a data search would normally be required. There is always a possibility that a building had previously been recorded as a bat roost. This information would inform mitigation, compensation and enhancement measures even if the results of the bat survey work ultimately prove to be negative.

I have now checked the data myself and there are no records of roosts within the onsite building. I will therefore not ask for data to be provided for this application.

However, for clarity – future schemes of this nature will require a data records search.

2. Paragraph 4.2.2 states that the report will remain valid for a period of two years. This should be 18 months as per CIEEM Advice Note from April 2019 ('On the Lifespan of Ecological reports & Surveys'). This should be amended.
3. Paragraphs 5.1.2 and 5.1.3 concern external lighting. I welcome these statements but would like the latest guidelines to be referenced please (<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>). In addition, these guidelines state that 'ideally' luminaire temperatures should be <2700Kelvin (p18). Could this replace the reference to '3000 Kelvin and below' please?

If external lighting is proposed for this application, a plan will be produced that demonstrates compliance with the lighting guidance referenced above. This plan must be agreed by the LPA ecologist.

4. The addition of a bat box is appropriate. Could the report add in a compliance element? An e-mail to the LPA with an attached photograph showing the box in position would suffice.
5. The cover photograph as well as the first image in Appendix 6 (Front (west) elevation) show scaffolding over the whole of the elevation. This is not referenced within the report. No comment is made regarding how this introduction might have impacted roosting bats. Had works already begun before the bat surveys were completed? This information should be added in.
6. The lighting plan and enhancement measures (+ compliance measure) will be conditioned within the planning permission if granted.