

INTERNAL MEMORANDUM

To: Rebecca Owens
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 1

Date of previous memo: -

Date: 23/07/2024

SUBJECT: P/24/0167 | Proposed conversion and change of use of existing vacant Wesley Chapel into 6 No self contained flats and associated external works (retention). | Wesley Methodist Church South Street Dowlais CF48 3DS

A detached, disused church building with grounds consisting of hardstanding, grassland and trees and situated within a residential area in the village of Dowlais. The site has moderately good links to the wider environment including further grassland areas, scrub and woodland pockets (in a range of sizes and types).

Designated sites within 500m of the application site:

- Within a Buglife B-Lines Area.

Priority and protected species within 500m of the application site:

- Birds (including Schedule 1¹ and Section 7² species);
- Invertebrates (including records for marsh fritillary butterfly, c.1083m from site and other Section 7² species);
- Lichens (including Section 7² species);
- Bats (closest roost record for lesser horseshoe bat, c.1533m from site);
- Water vole;
- Hedgehog;
- Amphibians (including great crested newt, closest record c.852m from site);
- Vascular plants (including Section 7² species).

Ecological documents submitted in support of the above application:

1. Wesley Methodist Church, South Street, Dowlais, Merthyr Tydfil, CF48 3DS. Bat Scoping Survey. Version V1.0. Date: April 2022. Ecological Services Ltd.

COMMENTS

The PRA report is 27-month-old as of the date of this memo (23/07/2024). **The PRA is therefore out of date and will need updating. This will include an internal inspection.**

Since the date of the report, new guidance and national planning policy has been published (see list below) and **the new survey will need to be undertaken and the new report written in the context of these updates.**

¹ Wildlife & Countryside Act 1981 (as amended)

² Environment (Wales) Act 2016

Guidance

- Collins, J. (ed.) (2023) **Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition)**. The Bat Conservation Trust, London. *[updated 09/23]*
- Reason, P.F. and Wray, S. (2023). **UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats**. Chartered Institute of Ecology and Environmental Management, Ampfield. *[updated 09/23]*
- Guidance Note GN08/23. **Bats and Artificial Lighting At Night**. Bat Conservation Trust and the Institute of Lighting Professionals *[updated 08/23]*

NB the [moderate] suitability of the building is unlikely to have altered since 2022 and therefore bat emergence surveys will be required. **It would make sense therefore to undertake the update to the PRA immediately prior to the first bat emergence survey. Night Vision Aids must be used and a static/automated detector deployed internally if there is access for bats.**

There will also need to be a Preliminary Ecological Appraisal (PEA) of the grounds of the church building to take into account the grassland and trees.

National planning policy

Planning Policy Wales 12 (PPW12) was published in February 2024.

PPW 12, Chapter 6 will need to be considered where relevant to this application.

The main changes to policy (that are or may/may not 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*