

INTERNAL MEMORANDUM

To: Kate Glover
From: Matt Davies (Ecologist)
Ext: 5278

Memo number: 2

Date of previous memo: 02/04/2024

Date: 01/05/2024

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

Document 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.

COMMENTS

The results of the Preliminary Roost Assessment (Document 1) show the building to have **moderate suitability** for (a range of species) of roosting bat. Therefore, two bat emergence surveys will be required later in the year during the bat activity season. The results of the emergence surveys are required prior to planning determination.

Para 8.5, page 10 states the building does not offer significant hibernation suitability for bats, however, there is 'some' suitability particularly for pipistrelle species. Therefore, following the precautionary principle, any works that would impact roosting bats will be undertaken outside of the bat hibernation period.

Para 8.8, page 10 states the number of bat surveyors required for all aspects of the building to be in view (x5) and that surveys will conform to current bat survey guidelines¹.

This will include:

Undertaking two separate dusk emergence survey visits, between May to September, with at least one of the surveys between May and August. The two surveys will be spread out to sample as much of the recommended survey period as possible, but at least 3 weeks apart. Night Vision Aids (NVAs) will be used, the positions of which should be informed by the PRA.

Automated/static bat detectors should also be deployed within the structure as a complimentary method. These should be deployed for at least 5 nights in the period between the two bat emergence survey visits.

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

¹ Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

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.*