

INTERNAL MEMORANDUM

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

Memo number: 2
Date of previous memo: 10/07/2024
Date: 23/09/2024

SUBJECT: P/24/0158 | Conversion of first and second floors to 12 self contained flats and associated external alterations | 68 High Street Merthyr Tydfil CF47 8AE

DOCUMENTS SUBMITTED

1. 68 High Street, Merthyr Tydfil. Preliminary Roost Assessment *prepared by* Acer Ecology Ltd. Revision 1.0. Dated 29 July 2024.
2. 68 High Street, Merthyr Tydfil. Green Infrastructure Statement *prepared by* Acer Ecology Ltd. Revision 1.0. Dated 25 June 2024.
3. 68 High Street, Merthyr Tydfil. Green infrastructure assessment drawing *prepared by* Bright vision holding Ltd. Sheet No: 2408-A05. Rev: A. Date: March 2024.

COMMENTS

Document 1

Data search

It was made clear that a BARB+ data search was required, but this was not undertaken.

Section 2.2.4 of Document 1 - Constraints (Local Records Centre Search) refers to CIEEM's Guidelines for Accessing and Using Biodiversity Data (2020):

"This approach is consistent with CIEEM's Guidelines for Accessing and Using Biodiversity Data (2020), which states that in low impact/small-scale scenarios, such as the remodelling of a former offices and a demolition of a single-storey building, a LRC search may not be required."

NB the guidelines were updated in 2023¹ - so the reference needs to be updated. In addition, the 2023 guidelines also state:

"The appropriateness of excluding a data search will need to be judged on a case-by-case basis as, in most situations, it will be essential to carry out such a search even if the development is very small or is likely to have a low impact. It can be very difficult to demonstrate that a data search would not have provided relevant information without obtaining and reviewing those data." ... and

"...it should not be assumed that data searches are never required for such [low impact / small-scale] scenarios and this must be judged on a case by case basis and justified accordingly."

The lack of data is accepted for this survey, but for future survey reporting where a data search is clearly requested and not supplied, reports will not be accepted.

Protected sites

Section 3.1.2 Protected Sites refers to SSSI sites and Ancient Woodland sites but does not include SINCs or the Buglife B-Lines Area. Further information required.

Bats

A plan marked with positions of bat access points and PRFs is required, to better evaluate numbers and positions of surveyors for dusk emergence surveys.

¹ <https://cieem.net/wp-content/uploads/2016/03/Accessing-and-Using-Biodiversity-Guidance-Version-3.pdf>

Where there is access into roof spaces, an automated/static detector will be deployed internally for a minimum of x5 nights under suitable conditions for bats.

The results of the dusk emergence surveys will be required prior to determination of this planning application. Bat survey work cannot be conditioned. Methodology within the latest industry guidelines (Collins 2023) will be followed (including , for example, use of Night Vision Aids (NVAs) and surveys starting 15minutes before sunset and finishing 1.5-2 hours after sunset). NB the dusk emergence survey work will need to be undertaken at the following times

- o Low roost suitability – May to August
- o Moderate roost suitability – May to September (with at least one survey between May and August)

It is unlikely therefore to be time for any of this survey work to be undertaken in 2024 and so it will need to wait until the 2025 bat activity season.

Documents 2 + 3

The GIS (Document 2) is acceptable, but must be accompanied by a long-term Landscape, Habitat and Ecology Scheme (LHES). The LHES should include:

- a. Details of retained landscaping/habitat/green infrastructure
- b. Details of new landscaping/habitat/green infrastructure
- c. A planting plan (all species must be native and of local (if not Welsh or UK) provenance
- d. Long term (at least 25 years) maintenance and management measures for all onsite landscaping/habitat/green infrastructure (both retained and new)
- e. Details of other ecological measures, e.g., bat boxes, bird boxes, hibernacula, gaps in boundaries for hedgehogs etc
- f. Monitoring post-development for all onsite landscaping/habitat/green infrastructure and other ecological measures
- g. Details of the funding mechanisms to meet the maintenance, management and monitoring objectives
- h. Details of the responsible person/management company

The drawing GIS illustrates the proposed green walls – *have these been considered in relation to any possible impacts on for example, roosting bats and nesting birds?*
