

INTERNAL MEMORANDUM

To: David Cross
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1
Date: 23/09/2020

P/20/0219 | CONVERSION OF BUILDING TO OFFICES WITH ASSOCIATED INTERNAL AND EXTERNAL RENOVATION WORKS. CREATION OF A BAT ROOST STRUCTURE AND THE ERECTION OF A NEW EXTENSION WITH A NEW PEDESTRIAN ACCESS AND BRIDGED WALKWAY. CONSTRUCTION OF A NEW ROOF WITH DORMER WINDOWS AND ROOF LIGHTS TO PROVIDE ADDITIONAL ACCOMMODATION. THE CONSTRUCTION OF A NEW CAR PARK AND CYCLE STORE WITH ACCES FROM PARK TERRACE AND OTHER ASSOCIATED WORKS. | FORMER YMCA BUILDING PONTMORLAIS WEST MERTHYR TYDFIL CF47 8UT

The following documents have been submitted in support of this application:

- Ecological Impact Assessment. Former YMCA in Merthyr Tydfil. Merthyr Tydfil County Borough Council (Ref WWE19143 BAS REV A; dated 27/07/2020)
- Ecology Mitigation Strategy 01 Drawing No. 3510 G

Comments:

1. There is no recent biological data for the site. As this project is being co-ordinated by MTCBC (Regeneration dept), the LPA can supply the data (attached to this e-mail in the form of 2x Excel spreadsheets). Can this please be interpreted and incorporated into the EclA report?
2. The EclA report refers to a PRA undertaken in 2016, which recommended 2x bat activity surveys. There are no details included regarding these surveys. The 2019 pre-dawn re-entry survey represented a top-up survey to bring the bat survey work for the application up-to-date, but the EclA report must also include the results of the previous survey work.
3. More justification for the building not being suitable for maternity roost is needed. For example, would not the fireplaces found within the structure have potential suitability for maternity use?
4. A lighting plan demonstrating consideration for roosting, commuting and foraging bats is required preferably prior to planning determination. The lighting will conform to (2018) *Guidance Note 08/18. Bats and artificial lighting in the UK. Bats and the Built Environment series. Bat Conservation Trust and Institute of Lighting Professionals* - <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/> as set out in Para 5.14 of the EclA. This will be necessary for licensing of the works.
5. Para 5.9 recommends internal and external illumination of the main building during construction to deter entry by bats. Would not internal illumination suffice here? Illuminating the building externally may disrupt foraging and commuting bats in the locality.

6. More details are required regarding the construction of the 'bat house'. What materials are to be used?
7. Para 5.10 refers to the use of bitumen felt. A statement is also necessary regarding treatment for timbers, if relevant (e.g., where treatment of existing timbers is required in-situ, only products suitable for use around bats will be used, as specified by Natural England and DEFRA at <https://www.gov.uk/guidance/bat-roosts-use-of-chemical-pest-control-products-and-timber-treatments-in-or-near-them>).
8. Paras 5.16 and 5.17 deal with site enhancements. These need to be specified within the report and incorporated into all relevant drawings for the development.
9. There is enhancement suggested for nesting birds, but no compensation for the loss of nesting opportunities.
10. In what order will works be scheduled? – NB the bat house will need to be constructed/completed prior to works commencing on the main building. This information is included on the Ecology Mitigation Strategy document, it also needs to be stated within the EclA.
11. The Bat Mitigation Plan in Appendix V is not in focus and cannot be easily read. This needs amendment.
12. It is not clear where the access points are on the bat house for each species? This needs clarification, both in the text and on the drawings. Point 11 on the Ecology Mitigation document refers to the access point for lesser horseshoe bat. Where are the access points for brown long-eared bat and common pipistrelle or is it proposed they use a common access point?
13. When the points above have been addressed, given the building is a roost for lesser horseshoe bats and a roost for 3 different species, **Natural Resources Wales must be consulted prior to determination of planning.**
14. The following informative must be provided on the decision notice (should planning permission be granted):

Warning: A European Protected Species (EPS) Licence is required for this development.

This planning permission does not provide consent to undertake works that require an EPS Licence.

It is an offence to deliberately capture, kill or disturb EPS or to recklessly damage or destroy their breeding sites or resting places. If found guilty of any of any offences, you could be sent to prison for up to 6 months and/or receive an unlimited fine.

To undertake the works within the law, you can obtain further information on the need for a licence from Natural Resources Wales on 0300 065 3000 or at <https://naturalresources.wales/permits-and-permissions/species-licensing/european-protected-species-licensing/information-on-european-protected-species-licensing/?lang=en>

NB as from 01 March 2018, NRW have introduced a new process in their EPS Licensing procedure that will automatically issue a copy of the EPS Licence that has been granted, to the generic planning mailbox of the relevant LPA.

When this is received it should be forwarded to the LPA Ecologist (Matt Davies).