

Barry & Vale Friends of the Earth
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Cyfeillion y Ddaear

Planning Case Officer, Mrs. Y. J. Prichard
Vale of Glamorgan Council

Amended from e-mail of 9 October 2016

Northcliffe Lodge development: App No. 2015/01449/FUL

Disclosure of records of Inspection for Bats on the Northcliff Lodge site

The high potential for bats roosting in the on-site trees and structures is recognised by the applicant's consultants David Clements Ecology Ltd. They give no evidence that they followed or could have followed the current Bat Conservation Trust guidelines, which are endorsed by the Chartered Institute CIEEM. As the "Council's Ecology Comments_201501449FUL" on the planning application site accept the unevidenced claim to have followed the guidelines, we ask that you seek this information from them. We ask too, that they document their statements about pipistrelle bats.

1. The June 2015 report from the tree consultants, Treescene, has recommendations which included *further investigation of suspected (tree) defects that require more detailed assessment and potential for wildlife habitat*. Their inspection from the ground reported much obscuring by ivy and other vegetation. Tree defects that could provide bat habitat/roosts are covered by this recommendation.
2. The DCE report of Dec. 2015 says "all the trees within the site boundary are mature specimens and were subject to a ground level inspection for their potential to support roosting bats following the BCT Guidelines (2012)". It reported the results as "No trees within the site were felt to be more than a category 2 tree (BCT guidelines, Appendix 5) with only a few limited features suitable for bats."
3. DCE's Additional Biodiversity Strategy of June 2016 states that nearby gardens are well used by foraging pipistrelle bats (as residents know) but offers no observations on this. Curiously it does not report what residents know well, that the Lodge grounds are also well used by bats (that may be pipistrelles). It does not say how they were identified as pipistrelles and not rarer species, as could have been readily determined by normal bat detectors.
4. This June 2016 document reports "visual inspection for (should read 'from') the ground for their potential to support roosting bats. No trees within the site were felt to be more than a category 2 tree (BCT guidelines, Appendix 1)".
5. We have accessed the BCT guidelines (3rd Edn, issued January 2016) from their website, which says the guidelines are endorsed by the Chartered Institute CIEEM). They describe 'preliminary ground level roost assessment' as a *detailed inspection of the exterior of the tree from ground level to look for features that bats could use for roosting. It prescribes systematic inspection around all parts of a tree and recording results in standard format. All trees surveyed should be numbered and marked on a map or plan of the site...should at least record the location (grid reference) and tree species....enable ecologists to locate the tree on subsequent visits...marking individual trees with a tag or some tape may be essential*.
6. A map or plan showing the trees surveyed with numbering, and a listing showing species and the claimed 'category' complying with the guidelines should therefore be available.
7. Could you therefore obtain from the applicant of DCW their records of their 'ground level inspection' of Dec. 2015 and their 'visual inspection' of June 2016? Also please ask for records that show the bats were pipistrelles and did not include other species.
8. We emphasise that the Council would be in breach of the Habitats Regs if you failed to consider the harm that would be caused to bat habitat including possible roosting places in the trees on the basis of the comment: *We note the findings of the reports, that no bat roost was found at Northcliff Lodge... We withdraw the holding objection to the scheme...* (Council's Ecology Comments_201501449FUL)