



**Cyfoeth
Naturiol
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Natural
Resources
Wales**

Ein cyf/Our ref: CAS-74912-Q4M1
Eich cyf/Your ref: 2018/01408/FUL (YP)

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FAO: Mrs. Y. J. Prichard

25 January 2019

Annwyl Syr/Madam / Dear Sir/Madam

Proposed demolition of existing school, development of 48 dwellings (43 flats and five houses) and associated works at Former Cowbridge Comprehensive School, Aberthin Road, Cowbridge

Thank you for referring us to the application above, which we received on 03 January 2019.

We provided pre-application advice to the applicant in a letter dated 06 December 2018. We have reviewed the submitted Pre-Application Consultation (PAC) Report supporting this application to provide you with advice.

We continue to have significant concerns with the proposed development as submitted. We recommend that you should only grant planning permission if the scheme can meet the following requirement. We would object if the scheme does not meet this requirement.

Requirement- European protected species - further information is required to demonstrate the proposal will not be detrimental to the maintenance of the favourable conservation status of Bats, a European protected species.

Bats (European Protected Species)

As you are aware, several bat species; pipistrelles, brown long eared, Myotis and lesser horseshoe, have been found to be using the building on site.

Further to our response letter, dated 06 December 2018, we note that the applicant has submitted the David Clements Ecology Report, dated 2017. We also note that the applicant has made amendments to the proposed bat roost drawing in light of our previous comments. However, at this stage, there continues to be insufficient information provided to demonstrate the proposal will not be detrimental to the maintenance of the favourable conservation status of Bats, a European protected species. As currently presented we do

not have sufficient information to provide you with advice on the bat mitigation proposed and a number of matters raised in our previous response have not been addressed.

Further detail is set out below.

- Further bat survey will be necessary to allow assessment of the likely effects on bats and appropriate mitigation. We had advised that the applicant discussed the requirements of further surveys with your in-house ecologist, to ensure an appropriate level of survey work to inform the application. This matter remains relevant. As currently presented, insufficient information has been provided by the applicant for us to provide you with advice on the bat mitigation proposed.
- We understand that additional survey work was also to be carried out over the winter period and that this survey work would inform the mitigation strategy for the site. This survey work has not been submitted and it should be noted that there is limited time now available to undertake this work under the current winter season.
- Further to our previous comments, we note that the applicant has added dimensions to the drawings of the proposed bat roost in appendix 6 of the Bat Survey Report, produced by Solstys Brewster, dated December 2018. However we note that the Proposed bat roost plan with the application has not been updated in line with this. It should be ensured in any final roost proposal that dimensions are included and that documentation matches. However, our position remains that there is insufficient survey provided to allow assessment of mitigation proposals. But, we advise that a detailed mitigation strategy would need to be submitted in support of any planning application. Mitigation should be appropriate and proportionate to the bat species and roost types on site.
- Notwithstanding the above point, we are unlikely to agree to a bat house being cited in the current proposed location as it would be subject to isolation from the wider environment and vulnerable to disturbance. Any bat house being provided on site should be located at the northern end of the site which is better connected to the wider countryside. The proposals should include security measures for the building, such as fencing, to prevent unauthorised access by people, or access by predators.
- As stated in our previous response letter, where a bat house has been created as mitigation for the loss of a lesser horseshoe maternity roost, evidence would potentially need to be submitted indicating the bat house is being used in this capacity prior to any works being permitted to the existing roost. This needs to be taken into account in the development timescales and mitigation proposal.
- Whilst we welcome the submission of a landscaping plan, we note that a lighting plan has not been submitted with the application. A lighting plan should look to reduce lighting over the site as a whole and avoid lighting completely in proximity to the bat house and the boundaries of the site, ensuring that a vegetated dark corridor would be maintained to the bat house which connects to the wider landscape. The plans should also include; the type of luminaire (including the exact specification), the location and height of the luminaire. Due to the presence of

several light intolerant species of bat on site we advise that this information will need to be provided prior to planning permission being given.

- We understand that there is lesser horseshoe hibernation roost under the A48 flyover that is in close proximity to the site. We note from section 3.16 of the bat survey report, produced by Solstys Brewster, dated December 2018, that this roost was 'not considered of particular ecological relevance to the application', however no details have been provided as to evidence this conclusion. Further detail; including but not limited to, the roosts location and proximity to the development should be provided.
- We understand that a number of trees on site could not be assessed for bats. It is not clear from the information submitted whether these are to be affected by the development. As stated in our previous response; '*The site layout plan identifies several trees to be removed as part of the development of the site. This may impact bats and therefore a Potential Roost Feature (PRF) survey will need to be carried out on any trees to be affected by the development. Any trees identified as moderate potential or higher for roosting bats will require climbing/endoscope inspections. Any surveys must be carried out by experienced, licensed ecologists*', we advise that this information needs to be provided prior to planning permission being granted by your Authority.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance. We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents relevant to their development. Please refer to our [website](#) for further details.

If you have any further queries, please don't hesitate to contact us.

Yn gywir / Yours faithfully

Helen Griffiths

Ymgynghorydd Cynllunio Datblygu / Development Planning Advisor
Cyfoeth Naturiol Cymru | Natural Resources Wales

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy. | Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi. | Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.