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27/02/2020

Annwyl Syr/Madam / Dear Sir/Madam,

**BWRIAD / PROPOSAL: PROPOSED DEMOLITION OF EXISTING SCHOOL, DEVELOPMENT OF 34 DWELLINGS AND ASSOCIATED WORKS INCLUDING THE CONSTRUCTION OF BESPOKE BAT ROOST, ACCESS/PARKING AND LANDSCAPING**

**LLEOLIAD / LOCATION: FORMER COWBRIDGE COMPREHENSIVE SCHOOL ABERTHIN ROAD, COWBRIDGE**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 3 February 2020.

**We continue to have significant concerns with the proposed development as submitted. We recommend you should only grant planning permission if the following requirement is met. Otherwise, we would object to this planning application.**

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.

We have considered *'the Hibernation Survey, Addendum report, dated 12 Nov 2019 by Soltys Brewster ecology*, submitted in support of the application but note that no additional survey work has been undertaken. The hibernation report dated March 2019 indicated in section 4.10 that 'Timing of previous surveys mean that it is currently not possible to rule out or confirm use of the building for maternity purposes'. The amended hibernation report dated 12 November 2019 now concludes that the building is unlikely to support use by brown long-eared or lesser horseshoe Maternity roosts due to its deteriorated condition. The amended report does not detail what new information and evidence was used to come to this altered conclusion.

Once additional survey work has been undertaken, it should be used to inform the proposed mitigation scheme and take into account the following advice;

- As detailed in our previous responses of the 25 January 2019 and 9 August 2019 ‘. *We advise that a detailed mitigation strategy would need to be submitted upfront in support of any planning permission sought. Mitigation should be appropriate and proportionate to the bat species and roost types on site.*’ A detailed mitigation strategy must include;
  - Details of the permanent bat house to be provided including; all dimensions of the bat house and volume of bat roost areas, details of bat access points, materials to be used (i.e. earth floors, double skin walls), internal structure, and human access points for monitoring, how the bat house sits within the surrounding landscape.
  - Details of provisions for the long term maintenance and site security of the permanent bat house
- As stated in our previous responses, we are unlikely to agree to a bat house being cited in the current proposed location (in the south of the site), as it would be subject to isolation from the wider environment and vulnerable to disturbance. We advise that 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. We note the submission of the constraints plans submitted in Appendix VIII which indicates that the bat house can not be positioned in the North of the site due to the presence of the easement from the A48, TPO’d trees, the need for houses to face the road and have adjacent parking. It states that *‘in effect, by this stage, the only logical location for the bat house is the south of the site where it is away from trees; flyover easement; and buildings, as well as being secluded.’* We do not consider this to be sufficient justification for the siting of the bat house in the southern part of the site, as it does not address the isolation and risk disturbance to bats. In addition, we note from the constraints plan that other built structures (stone walls and patios) are proposed within the area indicated as the easement zone (orange), as such it is not clear what the exact nature of the constraint is. No evidence has been submitted in support of the application to demonstrate that a bat house at the south of the site would be successfully adopted.
- As detailed in our previous responses of the 25 January 2019 and 9 August 2019, we note that a complete lighting plan has not been submitted with the application as detailed in our previous response; *‘A lighting and landscaping plan would need to be submitted with a planning application. This 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 note that 3 pages of what appears to be a 24 page lighting report have been included in the appendix of the amended

hibernation survey. Without the submission of the whole report, the submitted pages have no context and do not effectively demonstrate that adjacent habitat will remain unlit.

Therefore, we consider that there is insufficient information with the application to confirm the likely impacts of the proposals on bats and/or confirm that the proposals are unlikely to result in a detrimental impact to the maintenance of the favourable conservation status of the population(s) of the species concerned.

We would be pleased to review our position and provide further advice when consulted on the information specified above.

Should you feel it would be helpful, we would be happy to attend a meeting between ourselves, the LPA and the applicants.

### **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.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

### **Claire McCorkindale**

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning  
Cyfoeth Naturiol Cymru / Natural Resources Wales