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02/03/2021

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 9 February 2021.

**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 consider the following new information:

- Cowbridge school, Aberthin road, Vale of Glamorgan, Summer survey – Addendum report, 06 October 2020 submitted in support of the application.

We note the submission of further surveys of the former Cowbridge comprehensive school, which rule out maternity use of the building by bats including lesser horseshoe (LHS) bats. In addition, the report confirms that although reduced, there is activity in the southern half of the site by LHS bats. Therefore, based on the new evidence submitted, our concerns over the siting of the bat house in the south of the site have been addressed. However, further information is required in order to give confidence in the uptake of the proposed

mitigation bat house in the south of site once the site is developed. We also note that the remaining concerns raised in our letter of the 27/02/2020 and in previous responses have not been addressed.

In our letter dated 27/02/2020 reference CAS-108281-D0K6 we stated:

*'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 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.'*

However, since that response letter no additional details of the mitigation strategy for the site have been submitted. While we note that some details of the mitigation strategy have been included on the 'Proposed Bat roost plan 3703/PA/230', some details still have not been provided such as the internal height of the ground floor and the roof space in the bat house, whether the walls are double skinned, and details of the long term maintenance of the bat house including but not exclusively; who will retain ownership and maintain the bat house long term and by what mechanism will this be secured.

We welcome the planting proposed for the western boundary in drawing 3703/PA/210 rev A and 3702/PA/010 that show the inclusion of 7 larger trees included along the western boundary in addition lower level vegetation interspersed between them. However this does

not appear to be consistent with the planting outlined in the 'Planting plan 421.01 rev A' which only indicates three large trees will be planted. All three plans are appended to the 'the Hibernation Survey, Addendum report, dated 12 Nov 2019 by Soltys Brewster ecology. In order to give greater confidence that the bat house can function in the south of the site, it should be demonstrated that a sufficient dark vegetated corridor will be retained.

We note that part of an amended lighting plan has been submitted, however we note that only 2 pages of a 20 page report have been submitted. In addition we note that the Isolux modelling was undertaken with a device maintain of 0.80 (80% of full power), rather than the 100% outlined in the meeting held between ourselves, the LPA and developer on the 27 March 2020 . In addition we note that that the modelling shows that the majority of the western boundary of the site is still to be lit to over 1 lux. Given that 3 of the 5 species recorded using this site currently would be considered light sensitive, the success of the mitigation is reliant on the provision of a robust dark vegetated along the western boundary of the site.

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.

## **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