Template Method Statement to be used within a Bat Development Licence Application

This template Method Statement is to be used to form part of your Licence Application for a European Protected Species Development Licence. It will be used to determine the impact of the application on the favourable conservation status of the species concerned (Regulation 55(9) (b) of the Conservation of Habitats and Species Regulations 2017). It must be prepared by a consultant ecologist of other suitably qualified person. You are strongly advised to refer to the Bat Mitigation Guidelines[1], and The Bat Survey Guidelines (3rd Edition). Please submit your Application and supporting Method Statement electronically to the contact details provided below.

Please note as of the 1st March 2018 the declaration box found at the end of this template must be included on any Method Statements submitted in support of a licence application, and must be signed and dated by the applicant and ecologist. Any application containing a Method Statement without this declaration will be rejected.

Contact Details

Natural Resources Wales
Species Permitting Team
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Method Statement Title:	Bethel Chapel, Treharris, Merthyr Tydfil
Method Statement Version Number:	1VA
Method Statement Issue Date:	20/09/23
Site Address:	Bethel Chapel, Treharris, Merthyr Tydfil

[1] Bat Mitigation Guidelines (IN136) available to download from the Natural England website

Background and Supporting Information

A Executive Summary. No more than one side of A4

It is proposed to convert Bethel Chapel, Treharris into six residential units.

An initial bat inspection survey of the site was undertaken in 2016 and again in July 2023. No bats or evidence of bats was seen on the exterior of the building. The building was found to be a roost for up to four common pipistrelle bats in 2016.

The property was identified as a roost for two common pipistrelle bats in 2023.

As the property has been identified as a bat roost, a European Protected Species Licence will be required along with mitigation.

B Introduction

B.1 Background to activity/development

BE ECOLOGICAL LTD was commissioned by the client to undertake an updated initial bat inspection survey and activity surveys of Bethel Chapel for the potential presence of birds and bats prior to the building being converted.

The property was found to be a roost for up to four single common pipistrelle bats in 2016 and two single common pipistrelle bats in 2023.

As a result of this BE Ecological Ltd produced a method statement in support of a licence application to Natural Resources Wales. The method statement is contained herein.

B.2 Full details of proposed works on site that are to be covered by the licence

(Please note that the phrase "Named Ecologist" as used anywhere in this Method Statement also applies to any accredited agents as approved by NRW as part of this licence application).

Works to be covered by this method statement are those works involved in the repair and roof replacement of Gellifaelog Primary School, Merthyr Tydfil.

It is acknowledged that both surveys were undertaken in May, based on knowledge of bats this year, maternity roosts have been present earlier in the season due to warm weather at the start of the season. It is considered likely that any maternity roost would have been observed before 31st May 2023 (most recent survey). The second survey showed reduced activity at the site in comparison to the first survey. Due to the fact the school must be re-rooved within the school summer holidays, in order to gain a licence, the licence must be submitted as soon as possible with the data available. However, to safeguard the unlikely event of numbers increasing, a dusk emergence pre-commencement check at the site is scheduled and commissioned for early July. Works will only proceed if numbers of bats do not increase to greater than 5, particularly from any one access point.

Planning permission is not required as the roof will be replaced on a like for like basis.

Temporary mitigation will be installed prior to any works commencing on the bat roosts identified.

All site staff will be included within a tool box talk which will explain the ecological issues of the site, where bats have been found and what to do in the unlikely event that bats are found during the work. All staff joining the site after the initial induction will be given the same tool box talk.

The works to the bat roosts will proceed as follows:

1. The temporary mitigation will be installed and signed off by the supervising ecologist

2. The rooves will be inspected prior to the commencement of works by the named ecologist.

3. Any potential bat roosting features will be removed by hand and will be removed under the supervision of the named ecologist. Each area of roof covering will be lifted vertically and inspected prior to being discarded (or retained for re-use).

4. Should a bat be observed or identified it will be up to the supervising ecologist to capture it, assess it and release it using the temporary mitigation that is already in place.

5. With regards to any cavities, the refurbishment works will be carried out in such a way as to ensure that rubble or other materials do not enter the cavity i.e. any cavities will be covered to ensure no ingress of debris into the cavity.

6. Once the building holds negligible potential for roosting bats, the rest of the works may then proceed without supervision. The named ecologist will be on call for the duration of the project in the event that a bat or bats are found unexpectedly during the works.

7. Should a bat or bats be observed at any time when the named ecologist is not on site, all relevant works will cease and the named ecologist called. Work will not recommence until the named ecologist has attended site and provided appropriate advice to ensure the safety of the animal(s) in question.

8. In the event that any more than five common pipistrelle bats or any number of bats of any other species are observed within the building during the project, all works will cease and Natural Resources Wales consulted and an amendment to the development licence sought. Works may not recommence until the proposed amendments are approved.

B.3 Actions requiring licensing,

The proposed works have the potential to disturb roosting bats and destroy known roosting locations. Without careful timing and working methods there is also a possibility that bats could be injured and harmed during the building works. Mitigation suitable to the level of bat activity found at site will be implemented as part of the development works

C Survey and site assessment

C.1 Existing information on the bat species at the survey site.

A full suite of surveys for the presence of bats was commissioned by the applicant to ascertain if bats were present and the extent of their usage of the buildings proposed for development. If bats were present an assessment of the potential impacts of the development upon the species found was also made

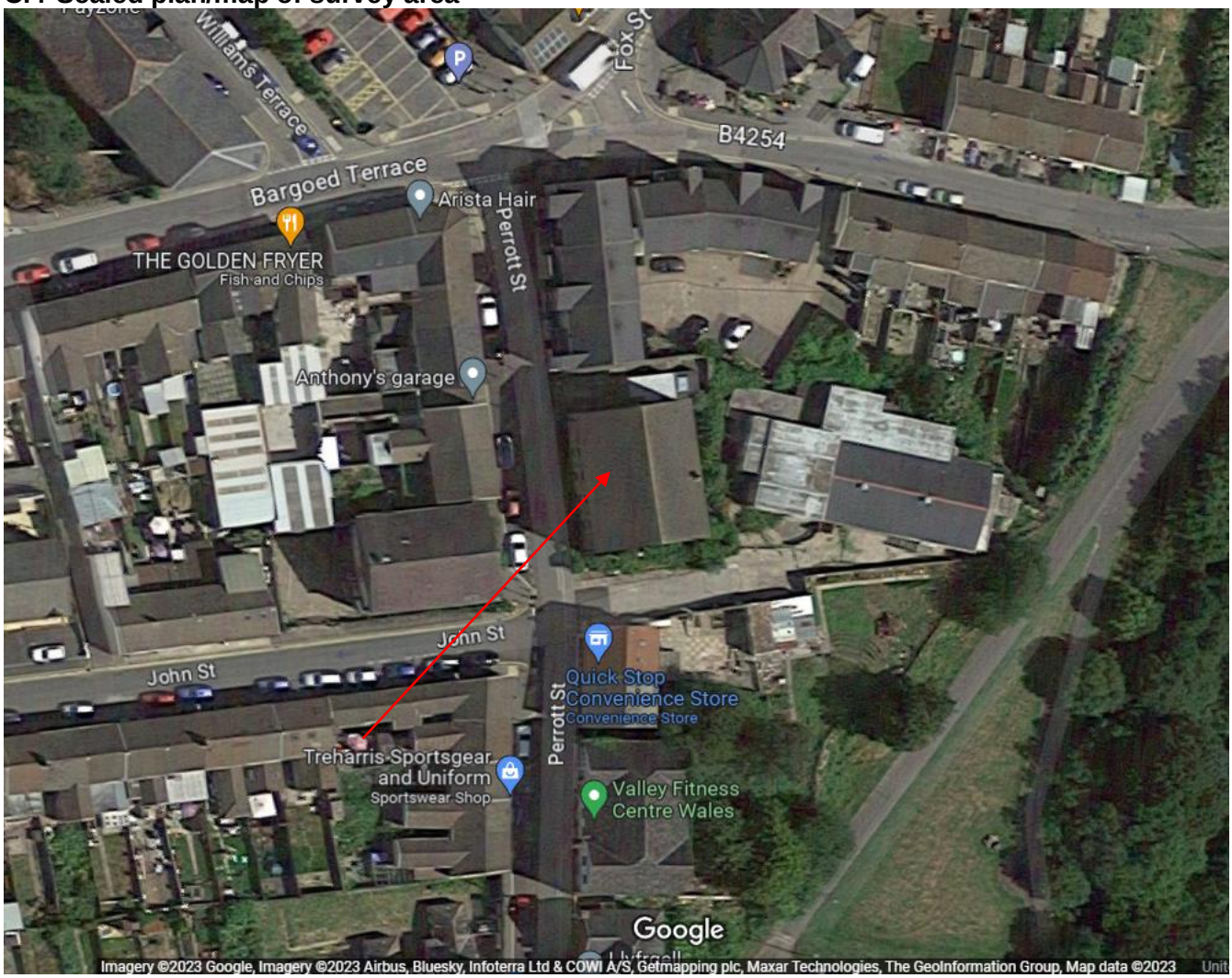
C.2 Statutory sites notified for the species (SSSIs or SACs) within 10km

N/A

C.3 Objectives of the survey.

- To carry out an initial bat inspection survey along with the recommended activity surveys
- To present the above details and if necessary recommendations for mitigation, future research and compensation within this report.
- To carry out a scoping survey for breeding birds

C.4 Scaled plan/map of survey area



Site location arrowed red (Google Maps, 2023)

C.5 Site/habitat description (relevant to bats)

The building subject to survey is a former chapel situated in Treharris, Merthyr Tydfil. The landscape surrounding the property compromises of terraced residential dwellings and local shops. There are large patches of woodland towards the wider landscape with the River Taff to the west and the Bargoed Taff to the east.

The building is a single storey mono-pitch cement rendered chapel, with interlocking tiles, the ridge orientated east to west. There is a roof space that extends over the west of the property. The roof space is of a simple traditional timber king post construction with underfelt beneath the tiles. There is no insulation present at joist level. There is a second roof space over the east of the property, however, there is no human access into this area.

There was an attached building to the west of the property (the vestry), again cement rendered and mono-pitched with interlocking tiles. Please note, this has been removed prior to the client purchasing the property.

C.6 Field survey(s).

Survey Summary

The bat survey comprised of the following parts

Three surveys undertakne in 2016 along with an initial inspection survey

2023

- Part 1- Initial bat inspection survey
- Part 2- A single activity survey
- Part 3 A second activity survey

Surveyor Information

The survey was run by Beth Evans. Beth is the owner of BE ECOLOGICAL LTD and has a postgraduate degree in Environmental Biology: Conservation & Resource Management, specialising in British bats. Beth has six years' experience of ecological surveys, both in a small scale and large multi-disciplinary context. Beth also holds Natural Resources Wales and Natural England bat licences to disturb and handle bats.

Beth Evans was assisted during the activity surveys by Michael Hogan and Michel Rodgers. Michael Hogan held a welsh bat licence for many years prior to retiring and has recently returned to work in the hope to regain his bat licences. Micahel Rodgers has been undertaking bat surveys with BE Ecologica ltd for the last two years and is currently working towards his licences.

Internal & External Inspection

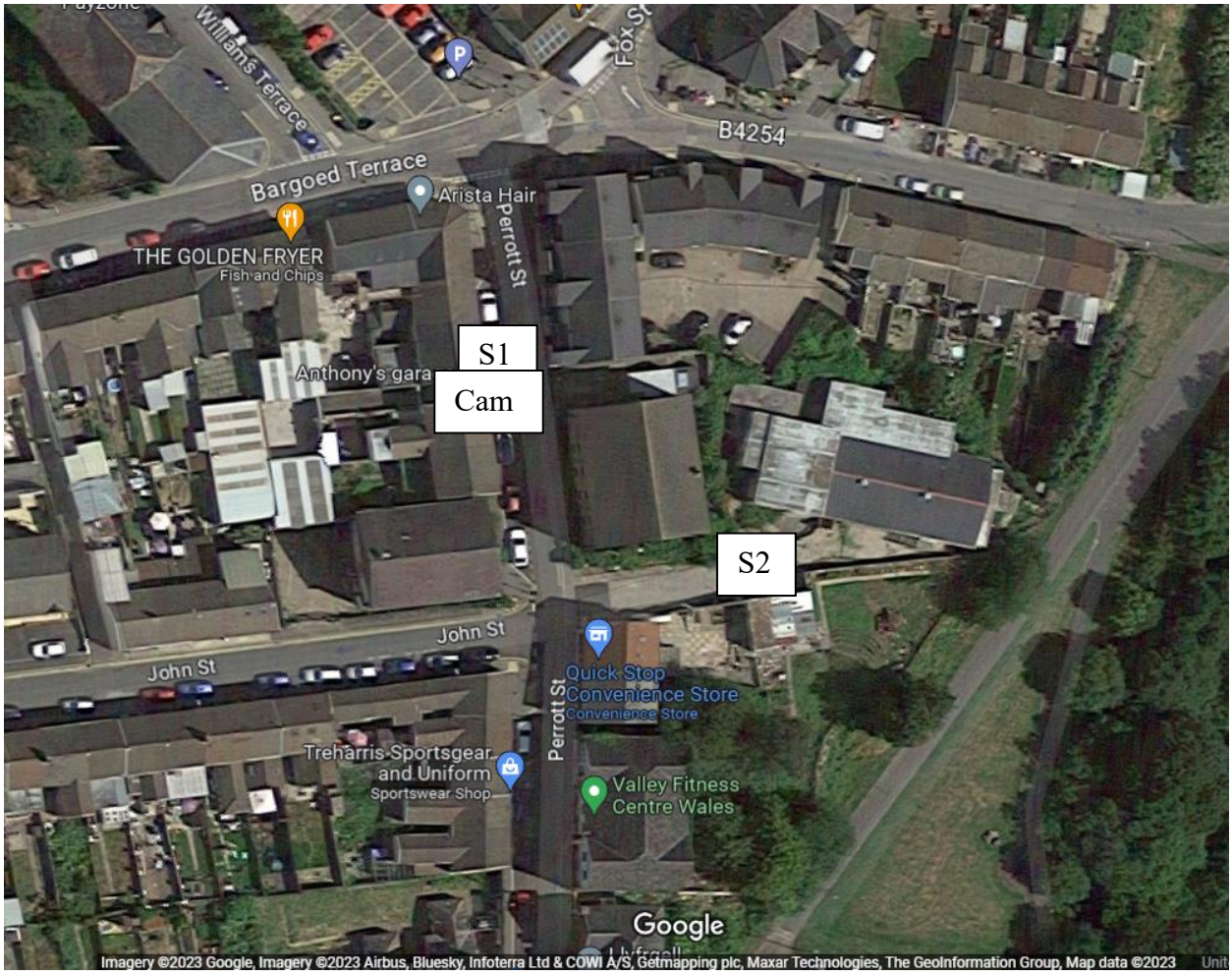
An initial inspection survey was carried out in 2016 and again in 2023 to search all buildings, both externally to identify potential bat roosting areas and signs of bat use including; live bats, dead bats, droppings, urine staining, grease marks and discarded prey items. The buildings and all areas/items of interest were recorded and photographed. Extension ladders/steps were used to safely access roof areas and fascia boards etc; where no safe access was available the survey was conducted using, close focus binoculars and/or a high powered lamp.

Activity Surveys (emergence/re-entry surveys)

Building 'emergence' and 're-entry' surveys were carried out on the following dates, times and weather conditions. Climatic conditions including rain, wind, temperature and cloud cover were recorded for each survey using a hand held Kestrel 4500 weather station.

Survey 1- 8th June 2023

A dusk survey was carried out on 8th June 2023 using surveyors positioned in such a way that as much of the building was visible to surveyors as possible. Surveyors were equipped with Batlogger M and M2 detectors and an IR camera



(Google Earth, 2023)

Figure 3: Approximate surveyor locations

Survey 2- 25th July 2023

A dusk survey was carried out on 25th July 2023 positioned in such a way that as much of the building was visible to surveyors as possible. Surveyors and cameras were equipped with Batlogger M and M2 detectors.

Survey 3- 8th September 2023

A dusk survey was carried out on 8th September 2023 positioned in such a way that as much of the building was visible to surveyors as possible. Surveyors and cameras were equipped with Batlogger M and M2 detectors.

Activity surveys

The surveys were undertaken as per the table below:

Survey Schedule and Weather Conditions

Table 1: Schedule and weather conditions

Visit	Date (sunrise) (sunset)	Start End	Time	Temp C	Wind	Cloud Cover	Notes
Survey 1 08/06/23	21:29	Start End	21:12 23:00	16 16	Low Low	30% 15%	Dry evening, insects flying
Survey 2 25/07/23	21:14	Start End	21:00 22:45	18 18	Low Moderate	30% 60%	Dry evening insects flying
Survey 3 08/09/23	19:45	Start End	19:30 21:15	14 14	Low Moderate	40% 40%	Dry evening insects flying

C.7 Survey Results.

The building appears to be superficially intact with the soffits, fascias, barge boards and slates relatively tight to the walls/roof in the majority of areas. However there are a number of features that may provide access for bats into the building, namely;

The occasional gap beneath lifted tiles
A handful of gaps beneath barge boards, soffits and fascias and at eaves level

Internal access was possible during 2016 (please see appended bat report). Voids were only able to be viewed from a ladder during 2023. There has been significant disruption in the interior as a result of vandalism and ongoing deterioration of the building. There has been illegal activities ongoing at the site over the years since the previous bat report.

C.8 Interpretation/evaluation of survey results

Survey 1- 8th June 2023

Generally bat activity at the site was low with only common pipistrelles heard.

The first bat heard was a common pipistrelle. The bat was observed emerging somewhere (likely beneath soffit or first row of slates. This was shortly followed by a second common pipistrelle emerging from the same location.

Other bats seen include common pipistrelles commuting back and forth the site to the south and west.

No further bats interacted with or emerged from the building on this date.

General location of common pipistrelle access point

Survey 2- 25th July 2023

Again bat activity was low at the site with only common pipistrelles heard throughout the survey.

Again approximately 15 minutes post sunrise two common pipistrelles were observed emerging from the same location as they had done on the previous survey before commuting west.

No further bats were seen emerging from or interacting with the building on this date.

Survey 3- 8th September 2023

Despite ideal weather conditions no bats were seen nor heard throughout the course of the survey. No bats emerged from nor interacted with the building on this date.

In summary in 2016, the property was found to be a roost for up to four common pipistrelle bats in 2016 and two common pipistrelle bats in 2023.

D Impact assessment

The property has been identified as a roost for a maximum of four common pipistrelle bats. The bats will be subject to temporary disturbance if they are within the property at the time of works.

D.1 Short-term impacts: disturbance

The property has been identified as a roost for up to four common pipistrelle bats. The bats will be subject to temporary disturbance if they are within the property at the time of works.

D.2 Long-term impacts: roost modification

N/A

D.3 Long-term impacts: roost loss.

A roost for up to four common pipistrelle bats will be lost temporarily. However, they will be replaced on a like for like basis with a more thermally stable roof and a secure building that is no longer deteriorating.

D.4 Long-term impacts: fragmentation and isolation.

There will be no loss of any vegetation identified as important commuting roosts within the site

There are no landscape features on the site the removal of which would affect any bats using the site

D.5 Post-development interference impacts.

There will be no loss of any vegetation identified as important commuting roosts within the site

There are no landscape features on the site the removal of which would affect any bats using the site

D.6 Predicted scale of impact on species status at the site, local county and regional levels. Include a scaled plan/s showing location and extent of vegetation to be cleared in the context of the current site, results of the survey information, bat exit points and flight routes etc

Geographical level	Scale of impact
Site	certain temporary reversible short term minor adverse impact
Local county level	no impact
Regional	no impact
National	no impact

Delivery Information – Mitigation, compensation and monitoring

Bats will be provided with a more thermally stable roost that is no longer deteriorating on completion if the works

E Works to be undertaken

Please identify which works will be undertaken or supervised by a licensed ecologist

E.1 Capture and exclusion (if applicable).

The licensed ecologist will provide a toolbox talk to all the site contractors prior to any works commencing. The talk will cover the legal protection afforded to bats, working methods around bats and what to do if bats are found during the works.

One bat box will be erected at a location agreed with the supervising ecologist within the site boundary. The bat box will be installed prior to works commencing. Any bats found during the proposed works will be removed from the building and placed within the bat box on the same day it is found.

If any more than five soprano pipistrelles any other species of bat be observed, relevant work will cease and the named ecologist will consult with NRW. There may then be a requirement to ensure that the building be made safe in respect of bats while any amendments to the licence are determined; this may include (but not be limited to):

- Replacing roofing materials
- Sheeting the roof in whole or part to make it weather proof

Should it not be possible to make the roof safe and replace bats into it, bats will be caught by hand and placed in a temporary holding tank and then placed in the previously erected temporary mitigation bat box by the ecologist. Egress from the boxes will be prevented by the insertion of cloths into the access points to prevent flight by bats until dusk. While the named ecologist is doing this no work will be undertaken on the roof strip.

Should the named ecologist consider the weather unsuitable for release of bats, they will be taken into care until such time as they can be released at the capture site using the temporary mitigation bat box.

Any bat which in the opinion of the ecologist is not fit for release will be examined further (by a vet if necessary) and placed into care until such time as it is considered fit for release. Immediate veterinary care will be provided for any bats considered as needing it.

The supervising ecologist will have received the relevant inoculations against rabies (EBLV1) and will wear suitable gloves at all times while handling bats.

No other person unless similarly experienced and vaccinated and under the direct supervision of the supervising ecologist will handle any bat at any time.

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E.2 Bat roosts and habitat

E.2.1 In-situ retention of roost(s)

N/A

E.2.2 Modification of existing roost(s)

N/A

E.2.3 New roost creation (including bat houses and bat boxes)

Temporary mitigation

A Schwegler 1FF bat box will be attached to the northern elevation of the building . Should the 1FF prove difficult to source, an eco bat box (crevice box) https://www.nhbs.com/title?slug=eco-bat-box will be installed in its place. (Bat boxes are currently had to source, so if the above are not available, a box of similar construction agreed by the ecologist will be erected.

Permanent mitigation

A gap between 15 and 20mm will be left around the entirety of the building between the wall/soffit and fascia to allow bats into the roof over the wall plates.

Timing

As the property has been identified as a roost for single bats only, it is anticipated that the work can be undertaken at any time of year.

Timber/roofing materials

All timber which bats may come into contact with will be untreated; however if treatment is required, only tanalised timber will be used ensuring that all excess residues are brushed off prior to use.

There will be no use of breathable membrane in bat roosts. Felt will be Type 1 bitumen only.

Lighting

All lighting will be in line with the following guidance https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/

E.2.4 Maintenance &/or modification of new and existing habitat

The impacts of the development are localised to the buildings only. There will be no loss of surrounding habitat and as such no impact on commuting corridors. Commuting corridors must remain unlit.

E.2.5 Scaled maps/plans

N/A, Mitigation is within the same building on a like for like basis.

E.3 Mechanisms for ensuring delivery of mitigation and compensation measures

W & L Construction and all successors in title will assume responsibility for ensuring that this Method Statement and monitoring is fully implemented. This includes appointing the named ecologist.

E.4 Mitigation contingencies

See Section 2.2 above and Section 7 below.

E.5 Biosecurity risk assessment

All those handling bats will wear gloves and will be rabies inoculated.

There are no issues associated with other non-native and / or invasive species.

F Post-development site safeguard

F.1 Habitat/site management and maintenance

W & L Construction will own the site and will own and be responsible for all mitigation, its maintenance and ongoing costs.

Should the land ever be sold, all successors in title will be made aware of the presence of bats and their responsibilities towards maintenance and management.

F.2 Population monitoring, roost usage etc.

Monitoring will be undertaken by a licensed ecologist appointed by W & L Construction or any successors in title.

Monitoring will be undertaken in year 2. A single emergence survey carried out by a licensed bat ecologist will be completed during the bat active period of May to September inclusive.

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F.3 Post-development mitigation contingencies

Monitoring of mitigation measures will be completed. If the results are unfavourable the licensed ecologist will assess the mitigation and conclude likely reasons for the results. A discussion will be undertaken with the client and proposals to improve the results will be provided. The client will be advised on how and why to implement these recommendations if the monitoring results are unfavourable. It is difficult to provide exact details on contingency plans until monitoring has been completed. There is a wide variety of measures that can be implemented to improve conditions at site

F.4 Mechanism for ensuring delivery of post-development works

W & L Construction and any successors in title will assume responsibility for ensuring that this Method Statement is fully implemented. W & L Construction will ensure that monitoring is fully implemented on completion.

G Timetable of works.

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Timing	Activity
As soon as licence is issued- 30th September 2024	Temporary mitigation to be installed. Toolbox talk covering all aspects of work under this licence to be given to contractors. Bat Box erected in suitable location.
As soon as licence is issued- 30th September 2024	Prior internal visual inspection of all roof void areas for bats will be undertaken by the ecologist. Supervised removal of the roof and likely bat roosting areas.
As soon as licence is issued- 30th September 2024	Mitigation to be installed as agreed and checked by the supervising ecologist on completion
As soon as licence is issued- 30th September 2024	Complete works
2025	Monitoring visit. Check of the roof and a single activity survey between May and September inclusive.

H Land Ownership – Mitigation Site

H.1 Mitigation Site/Compensation Site Ownership

The land will remain in the ownership of W & L Construction for the foreseeable future. The responsibility shall be passed on to any successors in title should the property ever be sold.

H.2 Mitigation Site/Compensation Ownership post construction

The proposed mitigation will be created in property owned by the client and any successors in title and will remain in their ownership for the foreseeable future. All bat roosting areas will be the site owner's responsibility to maintain. The licence holder is aware of their legal obligations to bats and future monitoring of the mitigation

I Declaration

I declare that should a licence be granted, the work as proposed in this Method Statement will be strictly adhered to. I understand that any deviation from the works as proposed in this Method Statement without agreement from NRW would result in a breach of the licence.

***NB**. Applicants should note that it is an offence under regulation 59 of the Conservation of Habitats and Species Regulations 2017 to knowingly or recklessly provide false information in order to obtain a licence*.

Signature of the **Applicant**	Martin Loonan	**Date**	20/09/23
For electronic submissions please insert an electronic signature above or place an x in the box opposite to confirm agreement with the declarations above.			X
Full name in BLOCK LETTERS	Martin Loonan		
Signature of the **Ecologist**	Beth Evans	**Date**	20/09/23
For electronic submissions please insert an electronic signature above or place an x in the box opposite to confirm agreement with the declarations above.			X
Full name in BLOCK LETTERS	Beth Evans		

J References

Credits for source information.

K Annexes

K.1 Pre-existing survey reports

K.2 Raw survey data.