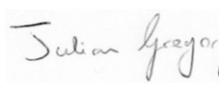


2024

**Park View Cottage,  
Merthyr, CF48 4HU  
Precautionary Non-Licensed Method  
Statement – Bats.**



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## 1. INTRODUCTION

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### 1.1 BACKGROUND

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- 1.1.1 EcoVigour Ltd has been commissioned by the client to undertake a Preliminary Ecological Appraisal (PEA) on Park View Cottage, the PEA identified that a further Preliminary Roost Assessment (PRA) was needed. The building was assessed internally and externally, and a single dusk activity survey was undertaken in September on the property. Due to the public health and safety issues concerning Park View, a soft strip of the roof prior to removal needs to occur under ecological supervision by a bat licensed ecologist. This Non-Licensed Method Statement (NLMS) has been produced for all site team to adhere to during the duration of the works.
- 1.1.2 EcoVigour undertook a Preliminary Roost Assessment, Bat Activity Survey Report and a Preliminary Ecological Appraisal on the site (Ref: J001039/PRA, J001039/BatActivitySurveyReport and J001039/PEA) and these documents should be used in conjunction with this Non-Licensed Method Statement.

### 1.2 RATIONAL FOR PRECAUTIONARY METHOD STATEMENT

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- 1.2.1 All British bats and may place used for shelter, protection, breeding sites and resting places are protected by law under the Conservation of Habitats and Species Regulations 2019 (as amended) and the Wildlife and Countryside Act 1981 (as amended).
- 1.2.2 Bats could utilise identified potential roosting features (PRFs) within buildings, some examples of these are:
- ◆ Raised, slipped or missing roof tiles / slates;
  - ◆ Cracks/crevices within the masonry;
  - ◆ Loose/fallen bricks / masonry;
  - ◆ Behind and under external timberwork; and
  - ◆ Behind vegetation on/in the structure such as ivy.
- 1.2.3 The proposed works (see Figure 1 below) include
- a) Removal of the walls at the northwestern corner of the building has made the roofline unstable and dangerous. Therefore it has been recommended that the roof is removed under a supervised soft strip. The supervision will be undertaken by a licensed bat ecologist. If any evidence of bats, or bats are found during the works then all works must cease and an EPS licence from NRW must be obtained before any further works are undertaken.
- 1.2.4 The surrounding habitat holds 'moderate' potential for foraging and commuting bats, the site has linear features provided by treelines and hedgerows within the wider area. However within the property footprint itself there is no vegetation. The linear features created by the treelines and the river Taff itself provide suitable commuting habitat for bat species, as well as the surrounding agricultural fields and woodland within the wider habitat creating suitable foraging habitat. The site is currently subject to sound, light and vibration disturbance caused by some minor works on site as well as the disturbance caused by the active site compound to the south of site that is largely illuminated by flood lights at night. The site sits within a busy urban residential area.
- 1.2.5 52 records were returned within a 2km radius, consisting of 5 confirmed bat species. The closest record to site was an unidentified bat species, recorded 129m from site in 2007. There was also a common pipistrelle (*Pipistrellus pipistrellus*) recorded foraging 360m from site in 2011. The most recent records are recorded in 2018 and consist of two greater horseshoe bats (*Rhinolophus ferrumequinum*), being recorded over 2.6km away in 2018. As a result of presence of records for bats within the wider area, and the suitability of the surrounding habitat, this non-licensed method statement pertaining to bats was produced.



### Location of Soft Strip for Park View Cottage

Park View Cottage

Non-licensed Method Statement

Author: Isabella Stephens

### Key

 Soft Strip Location  
Google Satellite

Source: QGIS, Ordnance Survey Data Crown and Database copyright 2023

EcoVigour Ltd, Hardwick Farm, Five Lanes, Caerwent, Monmouthshire,  
NP26 5PH

**Figure 1: Non-licensed work location.**

## 1.3 WORKS SCOPE

1.3.1 The works will require erecting scaffolding, a soft strip and removal of the roof. This will remove the health and safety hazard of the building being left up.

### 1.3.2 HOLD POINTS & CONDITIONS

- ◆ All works are running under the assumption that no bats are present, if evidence of bats or a bat is found during works then all works must cease, NRW consulted, and an EPS Mitigation license obtained.

## 1.4 LEGISLATIVE OVERVIEW

1.4.1 All British bats and any place used for shelter or protection, or breeding site or resting place (their roosts) are fully protected by law under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended).

1.4.2 Together these protect bats from:

- ◆ Selling, offering for sale, possessing or transporting for the purpose of the sale or publishing advertisements to buy or sell a protected species.
- ◆ Deliberate, intentional or reckless killing, injury or taking of bats.
- ◆ Damage to or destruction of or, obstruction of access to any place of shelter, breeding (roost) or rest.
- ◆ Disturbance of an animal occupying a structure or place.
- ◆ The deliberate disturbance of any bat species in such a way as to be significantly likely to affect;
  - their ability to survive, hibernate, migrate, breed, or rear or nurture their young; or
  - the local distribution or abundance of that species.



## 1.5 SITE SURVEY

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- 1.5.1 The Site was visited by a licensed bat ecologist on 3<sup>rd</sup> August 2024 to identify whether the site had the potential to support roosting and hibernating bats.
- 1.5.2 The survey methodology followed best practice detailed in Bat Mitigation Guidelines (CIEEM, 2023) and Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins (Ed), 2023). The PRA consisted of a visual assessment for the presence of any potential roost features (PRFs), together with a general appraisal of the suitability of the site for foraging and commuting bats. An initial ecological overview of the site is provided, and potential ecological constraints and impacts of the current proposals are assessed. Recommendations for further surveys are provided where necessary.
- 1.5.3 Surrounding vegetation and habitat on site was also assessed for its linear features and suitability for supporting foraging and commuting bats.
- 1.5.4 The area where the works are occurring was deemed to be of 'moderate' potential for roosting bats however due to the features being exposed to the elements, and active works site, light pollution from the large compound to the south of the site and the cavity walls being filled top to bottom with thick cobwebs (indicating no usage by bats) only one activity survey was undertaken. For further information pertaining to the site survey, please refer to the original PRA report.

## 2. PRECAUTIONARY METHOD STATEMENT

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- 2.1.1 The precautionary approach will require a licensed bat ecologist to undertake pre-works checks on the building before works start and continuously supervise the roof being removed by hand in a 'soft' strip method.
- 2.1.2 A briefing will be provided to contractors by the ecologist prior to the commencement of the proposed works. The briefing will raise awareness of the use of how to identify bats and the evidence of bats roosting; their legislative protection; and will provide a mechanism for the understanding and reporting of any sightings. The works are being undertaken during the daytime in November 2024.
- 2.1.3 Once the roof has been removed and the tops of the wall cavities around the building have been thoroughly inspected for evidence of roosting bats; the licensed ecologist will no longer need to supervise on site. A licensed ecologist will remain on call for the duration of the remaining works for any questions or in the case of any new evidence of bats being found.
- 2.1.4 All works should be undertaken during the daytime, with no additional lighting. The works should be isolated to the roof and will be accessed using erected scaffolding.
- 2.1.5 If evidence of bats or a bat is found during works, then all works must cease.
- 2.1.6 In the unlikely event a bat or evidence of bats is found, all works will stop until a European Protected Species (EPS) licence has been sought and obtained from Natural Resources Wales. It is likely that this process would push the project into the optimal season for bats (May to August) and that no works would be possible until the correct surveys have been undertaken. The bat will be left in-situ if suitable cover is available, if not it will be assessed and taken into care until it can be released (dependent on species, weather conditions, etc)
- 2.1.7 All contractors will remain vigilant at all times during the course of the works. If at any point evidence of bats is identified within the works footprint the following procedures must be followed:
  - ◆ All works must immediately be stopped.
  - ◆ Inform the on-call ecologist.



- ◆ The ecologist will advise on the appropriate course of action.
- ◆ Do not resume works until advised to do so by the ecologist.

## SUMMARY OF ACTIONS

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The points below highlighted the overall process of approach:

- ◆ Supervision of the 'soft' strip of the roof.
- ◆ Licensed ecologist to remain on call for the duration of the works once the roof has been removed.
- ◆ No additional lighting to be used.
- ◆ All works to be undertaken during the day.
- ◆ Once all works have been completed, the scaffolding will be removed.
- ◆ Works must cease in the event of a bat being found and the ecologist consulted. No further works may take place until the site ecologist has advised this is permitted.
- ◆ Should a bat EPS License be required, then works may be delayed up to 8 weeks (or longer) and must subsequently be undertaken in line with an agreed methodology with NRW. Seasonal constraints are likely to apply.
- ◆ The contractor will abide to all hold points and conditions outlined within this document.