

Construction Phase - Reptile Mitigation Strategy

PROJECT TITLE: Demolition of 2 Wings of Pen Y Dre Comprehensive School, Merthyr Tydfil, redevelopment to provide a modern facility and associated works

SITE ADDRESS: Pen Y Dre High School, Goitre Lane, Gurnos, Merthyr Tydfil, CF47 9BY

PLANNING REF: P/23/0225

DATE: 5th November 2023

Planning consent is being sought for the demolition of two wings of Pen Y Dre Comprehensive School. The school building is centred at SO 0487808538. All buildings within the school site were subject to an external assessment for the potential to support roosting use by bats on the 4th August 2021. Bat activity surveys of the buildings site were undertaken in September 2021, July and August 2022. A maximum count of 2 Common Pipistrelle bats were observed returning to roost on the western elevation of the main school building. Full details of the survey methodology and findings can be found in the separate survey report by Ecological Services Ltd.

Green Infrastructure

Chapter 6 of Planning Policy Wales (version 12), paragraph 6.2.5 requires Green Infrastructure considerations to be included with all planning applications. Development proposals must detail how green infrastructure considerations which are proportionate to the scale and nature of the plans are being provided.

The proposed development site boundary is limited to Pen Y Dre School building, thus green infrastructure within the site boundary is negligible at present. The school building is immediately surrounded by tarmac play areas, car parking and footpaths. Along the northern edge of the school grounds is an area of semi improved grassland and a hedgerow. The grassland also wraps around the western edge of the school / car parking area. A tree line and scrub is present along the western boundary of the school grounds.

To the east of the school building is an area of semi improved grassland and sports pitches. These features, in particularly the tree lines and hedgerows provide habitat connective into the wider landscape.

The proposed development work affects the school building only. No additional lighting or soft landscaping is proposed as part of the development proposals. Therefore the development is unlikely to affect any green infrastructure features within or directly adjacent to the site boundary.

Bats

Detailed development proposals were not available at the time of the survey work in 2022 therefore broad recommendations were made. Plans have now progressed and planning consent is sought for the demolition of 2 wings of the school building only. The sections of the school building proposed for demolition are not in the vicinity of the identified bat roosting location therefore there proposed works are considered unlikely to affect bats and any roosting location.

Whilst no evidence of the presence of bat roosting use was found in the sections of the building proposed for demolition during the 2021 and 2022 activity surveys, a precautionary approach to the demolition works is recommended. A method statement is provided within Appendix 1 of this report which will be followed by Morgan Sindall and any subsequent sub contractor that maybe employed.

It has been confirmed that no lighting will be erected as part of the proposed planning application. Therefore no lighting strategy will be provided as part of the planning application.

Biodiversity Enhancements

The Environment Act (Wales) 2016 places a duty on competent authorities such as Merthyr Tydfil County Borough Council to conserve and enhance biodiversity. The below features will be provided as part of the development proposal to demonstrate biodiversity enhancements:

Provision of Bat Roosting Opportunities

A total of 9 surface mounted bat boxes will be provided within the wider school grounds. Given the finish of the school building and lack of new wall creation it is not possible to use integrated bat boxes as part of the scheme. All boxes will be surface mounted and placed no lower than eaves level of the wider school building with the access gap left open for use and will be located as follows: -

- 2 x 1WQ Schwegler Summer & Winter Bat Box on the northern elevation of the school buildings,
- 2 x Eco Kent Bat Boxes on the southern elevation of the school buildings,
- 1 x Eco Kent Bat Boxes on the northern elevation of the school buildings,
- 2 x 1FQ Schwegler Bat Roost Boxes on the southern elevation of the school buildings,
- 2 x Vivara Beaumaris Woodstone Bat Box on the southern elevation of the school buildings,

No external lighting will be placed within 2m of any bat box. Photographic evidence of the boxes will be sent to the local planning authority ecologist once completed. Types of bat boxes can be found in Appendix 2 and the approximate location each box can be found in Appendix 3. All box locations and type must be added to architectural drawings.

Provision of Bird Nesting Opportunities

Five surface mounted bird boxes will be provided within the wider school grounds. Given the finish of the school building and lack of new wall creation it is not possible to use integrated bird boxes as part of the scheme. All bird boxes will be surface mounted at eaves level (a minimum height of 5m above ground level). The following bird boxes will be provided:

- 3 x Habi Sabi Double Swift Boxes on the eastern elevation of the school buildings
- 2 x Habi Sabi Double Swift Boxes on the eastern elevation of the school buildings

Photographic evidence of the boxes will be sent to the local planning authority ecologist once completed. Types of bird boxes can be found in Appendix 2 and the approximate location each box can be found in Appendix 3. All box locations and type must be added to architectural drawings.

Best Wishes

Ash Harris
Director
Ecological Services Ltd

Signed: Ash Harris Date: November 2023

Reference List

- Ecological Services Ltd '*Bat Survey; Pen-Y-Dre Comprehensive School, Gurnos Estate, Merthyr Tydfil, CF47 9BY*' November 2023 V4

Appendix 1 - Bat Method Statement

As part of the planning process a method statement for the proposed demolition works has been agreed and is required to be implemented during demolition works at site.

Legislation

All British bats are a European protected species and are protected under the Conservation of Habitats and Species Regulations 2010. In summary, they are protected from:

- Deliberate capture, killing and injuring,
- Deliberate disturbance of a breeding site or resting place,
- Damage or destruction of a breeding site or resting place.

Schedule 5 of The Wildlife and Countryside Act (1981) also protects all species of British bat and their roosting locations. British bats are protected from intentional or reckless disturbance and or obstruction of their roosting places.

Bat Species

18 species of bat are resident within the UK. They vary in size from the pipistrelle species which can sit on top of your thumb to the noctule bat which fits inside the palm of an adult hand. Some bat species prefer to tuck themselves away in small gaps or cracks measuring from around 25mm. Other bat species will hang in an open room or cave and are around the size of a plum.

Horseshoe bats prefer free flight access and egress into the roosting area. Horseshoe bats tend to be more light averting to other UK bat species, and routinely fly around the internal roosting area to warm up before exiting. It is noted that Plecotus (Long Eared) bats share some of these preferences. Crevice dwelling bats (vesper species) prefer to land and crawl through gaps and cracks to suitable crevices for roosting.



You may not always see bats when undertaking work. The presence of bat droppings can indicate the presence of bats.



Working Methodology

The demolition of the two blocks at Pen Y Dre Comprehensive school is proposed to be undertaken over the winter period of 2023 / 2024 with all **demolition works completed by 1st April 2024**. Whilst the presence of bats within the building is considered to be highly unlikely as a precaution the below measures will be implemented during work:

- A suitably licenced ecologist will supervise the roof removal work to each block proposed for demolition. The ecologist will give a tool box talk to all contractors prior to works starting on the building. All contractors must remain vigilant for the potential presence of bats within all areas of the building.
- Contractors under direct supervision of the ecologist will remove the barge boards / fascia boards around each block by hand lifting each item from the building. The Contractor and ecologist will then search the underside of the board and also inspect the aperture where the board was lifted from. Once no bats have been seen the contractor will hand down the board and the process will be repeated.
- The removal of any boarding and other roof materials will be by hand and taking care not to twist or bang. Check the underside of all materials removed. Keep a careful watch for bats during this operation.
- Once all the barge boards have been removed a visual inspection of the area will be undertaken. The blocks proposed for demolition have a flat roof. Generally with a flat roof the roofing felt is rolled over the roof edges and attached to a batten along the elevation wall. If there are gaps and between the batten, felt and elevation wall the roofing felt will be prised off and rolled back to expose the batten. The batten will then be removed.
- Once the supervising ecologist is satisfied that bats are unlikely to be present within the structure they will provide written confirmation that demolition works can progress. The buildings will be pulled down using a JCB or similar machinery and the rubble removed from site.

- If bats are or evidence of the presence of bats are found at any time during the demolition works all work must cease. Natural Resources Wales will be contacted for advice on how to proceed. Their advice is likely to entail that all work must stop and a development licence be sought prior to demolition works recommencing.
- Any questions? Please sign to acknowledge this document:

Name	Signature to acknowledge the above information

Supervising Ecologist Details : Aislinn Harris of Ecological Services Ltd

Survey Licence Number : S092780/1

Phone Number : 07305143857

Appendix 2 - Proposed Bat & Bird Boxes



Habi Sabi Swift Box



Eco Kent Bat Box



1WQ Schwegler Summer & Winter Bat Roost



1FQ Schwegler Bat Roost



Beaumaris Woodstone Bat Box

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INTRODUCTION AND SCOPE

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 22 Statistical Abstract, 1992, 72-2, 72-3
 23 <http://www.fishbase.org>
 24 "Species 800" by American Museum of Natural History, *U.S. GPO*, 94
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