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Pandy Farm, Merthyr Tydfil

Bat Report and Ecology Assessment



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1. Introduction

- 1.1 This report has been prepared by Ecology Planning on behalf of Kevin Jones in support of a listed building and planning application for the change of use of several existing barns at Pandy Farm, Brecon Road, Merthyr Tydfil, hereafter referred to as the 'Site'.
- 1.2 The assessment includes all affected buildings, together with ecological information gathered during several years of survey, restoration and monitoring work undertaken at the Site. The report incorporates the original building descriptions and survey findings from 2022 for context and continuity, together with updated survey information collected in 2025.
- 1.3 Buildings B–C were subject to a programme of bat emergence and re-entry surveys during 2025 to inform the current change of use proposals. Buildings D–H were subject to licensed bat works associated with restoration activities completed in 2024, with post-works monitoring undertaken during summer 2025 in accordance with licence requirements. The results of these surveys and monitoring are presented within this report to inform the proposed development.
- 1.4 This report updates and supplements the findings of Ecology Planning Bat Report 1703/02e (2022). For ease of reference and continuity with previous surveys, all buildings retain the same reference numbers used in the 2022 report, and the descriptions contained herein should be read in conjunction with the earlier assessment. Building A comprises the farmhouse and clock tower. As no works are proposed to these structures, they were not subject to updated survey in 2025 and are not considered further within this report.
- 1.5 At the request of Merthyr Tydfil County Borough Council, surveys were also undertaken within the surrounding garden area. The results are included to assess any ecological implications arising from the proposed change of use.
- 1.6 The Site is situated at National Grid Reference SO 040070 adjacent to Brecon Road.
- 1.7 All protected species were considered following the initial Site walkover survey and subsequent detailed investigations. Potential ecological impacts are highly localised and do not extend beyond the Site boundary. Bats and nesting birds are considered within this report. No suitable habitat is present to support other protected species, and no impacts upon other protected species are anticipated as a result of the proposals.
- 1.8 The report provides details of the survey methods employed, survey results, impact assessment, and recommendations for mitigation, compensation, monitoring and biodiversity enhancement, with reference to relevant legislation, planning policy and conservation guidance.

2. Methodology

- 2.1 This section provides details of all methods used in this ecological assessment including timing of works, weather conditions and equipment used.
- 2.2 All works were carried out in accordance with best practice guidelines including:
- Bat Surveys for Professional Ecologists Good Practice Guidelines¹;
 - Bat Mitigation Guidelines²; and
 - Bat Workers Manual³.

Desk Study

- 2.3 A desk study was undertaken. Records were supplied by SEWBREC for roof nesting birds and bats within a 2km radius. This was not updated in 2025 as the results were considered valid.

Site Survey

Building Assessment

- 2.4 An external and internal assessment of all buildings within the Site was originally undertaken on 22 April 2022 by Rebecca Bohane, a licensed bat worker. The assessment was updated during July 2025 to reflect the current condition of the buildings and to identify any changes relevant to bats, nesting birds and other ecological receptors.
- 2.5 The building assessment followed standard methodologies for Preliminary Roost Assessment (PRA) and comprised a systematic inspection of all accessible external and internal features. The survey sought to identify:
- Direct evidence of bat use, including droppings, feeding remains, staining, scratch marks and dead bats;
 - Features with potential to support roosting bats, including roof voids, lifted slates, gaps beneath ridge tiles, crevices within stonework, timber beams, soffits and other suitable voids;
 - Evidence of nesting birds, including nests, feathers, droppings and nesting material; and
 - General building characteristics relevant to protected species, including construction type, condition, levels of disturbance and connectivity to surrounding habitats.
- 2.6 The survey was undertaken using visual inspection aided by high-powered torches, close-focussing binoculars and ladders where necessary to inspect elevated features. Survey effort was limited to areas that could be safely accessed without causing damage to the buildings.
- 2.7 The 2025 update comprised a review of the buildings and surrounding habitats to identify any changes since the 2022 assessment. Where no material changes to building structure, condition or potential roost features had occurred, the original building descriptions were retained. Where alterations had occurred, descriptions and assessments were updated accordingly.
- 2.8 Following inspection, each building was assigned a level of bat roosting potential in accordance with current Bat Conservation Trust guidance.

¹ Collins, J. (ed.) (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn)*. The Bat Conservation Trust, London

² Mitchell-Jones, A.J. (2004) *Bat Mitigation Guidelines English Nature*, Peterborough

³ Mitchell-Jones, A.J. & McLeish A.P. (2004) *Bat Workers Manual (3rd Edition)* JNCC, Peterborough

Buildings B–C

- 2.9 Buildings B–C were subject to updated bat surveys during the 2025 maternity season to inform the proposed change of use. Surveys were undertaken in accordance with current good practice guidance, including the Bat Conservation Trust's *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th Edition).
- 2.10 Three dusk emergence surveys were completed during suitable weather conditions between May and August 2025 of Buildings A and B. Two emergence surveys were carried out on Building C. Survey effort was proportionate to the roosting potential identified during preliminary inspection and was designed to determine the presence or likely absence of roosting bats, identify species present, and assess the nature and significance of any roosts.
- 2.11 Surveyors were positioned to provide full coverage of all potential access and egress points. Observations were supported by the use of ultrasonic bat detectors capable of recording and identifying bat calls.

Buildings D–H

- 2.12 Buildings D–H were subject to licensed bat works associated with restoration of the buildings under Natural Resources Wales bat licence S093109-2. The licensed works were completed in 2024.
- 2.13 As a requirement of the licence, post-works monitoring was undertaken during summer 2025. Monitoring comprised a single dusk emergence survey undertaken in accordance with the licence requirements and agreed monitoring strategy. The purpose of the survey was to assess continued use of the buildings by bats following completion of the restoration works and implementation of mitigation measures.
- 2.14 Surveyors monitored all buildings and associated bat access points using visual observations and ultrasonic bat detectors. The survey was undertaken during suitable weather conditions and followed standard bat survey methodologies.

Emergence/Dawn Swarming Surveys

- 2.15 **Appendix 4** illustrates surveyor locations, although these were strategically located during different surveys and were not necessarily covering one building per survey. This means some elevations were surveyed on more than one occasion as they were visible from surveying a different section of the complex. Surveys were well spaced during the 2025 maternity period. A minimum of three surveys were carried out of Buildings A and B and two surveys of Building C.
- 2.16 The dates and weather conditions were suitable for all surveys, as detailed in **Table 1.** below.

Date	Buildings Surveyed	Dawn/ Dusk time	Duration	Temperature (Start - End)	Cloud Cover	Wind	Precipitation	Automated Detector Location
23/07/25	B (east and west) C	21:19	21:00 – 22:50	22.3°C – 20.3°C	8/8	None	None	Inside B east Inside B west
24/07/25	E F	21:18	21:00 – 22:50	23.7°C – 21.3°C	8/8	None	None	West of F
28/07/25	C	21:10	20:55 – 22:35	22.0°C – 21.0°C	2/8	None	None	East of C
15/08/25	E F	20:43	20:20 – 21:15	21.0°C – 18.8.°C	2/8	None	None	East of E
16/08/25	H G	20:42	20:20 – 21:15	22.4°C – 21.0°C	2/8	None	None	Eat of G
24/08/25	B (east)	20:20	20:00 – 21:50	22.5°C – 20.5°C	1/8	Very light breeze	None	Inside F
25/08/25	B (west) C	20:19	20:00 – 21:50	21.3°C – 20.2°C	2/8	Very light breeze	None	Inside B North of B
21/09/25	B (east) B (west)	19:12	18:55 – 20:40	13.5°C – 11.5°C	7/8	None	None	Inside B east

Table 1. Dates, durations and weather conditions of night-time bat surveys.

- 2.17 All surveys were undertaken by Laurence Brooks, Sorchia Lewis and Janice Vincett. All are licensed bat worker and experienced bat surveyors (each with more than 15 years' experience).
- 2.18 Surveyors used Duet frequency division detectors alongside Echometer Touch 2 Pro detector, together with XInfrared Thermal Eye t2Pro cameras. Static automated Anabat Express detectors were used for additional coverage. Example coverage of the building using the night vision cameras is shown at Appendix 1.
- 2.19 All calls were recorded as MP3 files/WAAC files and analysed using *BatSound* and *Analook* software.

Preliminary Ecological Appraisal (PEA) incorporating Phase 1 Habitat Survey Methodology

- 2.20 The surrounding garden and associated habitats were surveyed in March 2025 at the request of Merthyr Tydfil County Borough Council. The survey comprised a Preliminary Ecological Appraisal (PEA) undertaken in accordance with standard Phase 1 Habitat Survey methodology as described by the Joint Nature Conservation Committee (JNCC), together with an assessment of the potential for protected and notable species to be present.
- 2.21 Habitats within the survey area were mapped and classified according to recognised Phase 1 Habitat Survey categories. The survey recorded habitat types, notable botanical features, evidence of protected species and any ecological constraints or opportunities associated with the proposed development. Particular consideration was given to the suitability of habitats for bats, breeding birds and other protected species likely to occur within the local area.
- 2.22 At the request of Merthyr Tydfil County Borough Council, the northern boundary adjacent to Brecon Road was assessed with reference to the ecological value of the feature and the potential implications of partial removal to facilitate the proposed access.

Constraints

- 2.23 The surveys were carried out in accordance with best practice guidelines, with optimal timing of surveys. The valley between the southern stable block (Building F) and the courtyard stable block (Building H) is nearly impossible to view from any aspect.

- 2.24 The southern and eastern elevations of the Coach House (Building E) could not be viewed as these elevations can only be seen from neighbouring properties.

3. Results

Desk Study

Designated Sites

- 3.1 There are no designated sites for bats within 2km of the Site.

Background Records

- 3.2 More than 400 records of bats were returned from within 2km of the Site. The vast majority relate to in flight records and very few of roosts. Many of the roost records are historic. The nearest confirmed records of roosts include:
- A possible small natterer's roost at a distance of 1.2km;
 - A possible small daubenton's roost at a distance of 1.2km;
 - 2 unidentified minor roosts at a distance of 1.2km;
 - One unidentified pipistrelle roost at a distance of 1.3km; and
 - A minor soprano pipistrelle roost at a distance of 1.4km.
- 3.3 There are multiple records from Cyfarthfa Park of a wide range of species. These all relate to static detector surveys and without detailed data it is not possible to say over what time period these records were collected. There do not appear to be sufficient records of any one species to indicate a significant roost nearby.
- 3.4 Records provided by the Council Ecologist show that multiple roost record exist associated with the extensive roost complex at Cyfarthfa Castle 300m to the north of the Site, these regional records are not considered further for the following reasons:
- 3.5 Absence of Corroborating Field Evidence: The historical records detail high-status maternity roosts for common and soprano pipistrelles, possible maternity use by brown long-eared bats, and roosts for both lesser and greater horseshoe bats. However, full field surveys at the application site in recorded absolutely no horseshoe or brown long-eared bat activity.
- 3.6 Negligible Site Utilization: The field data confirmed only localized, low-status day roosts containing small numbers of individual pipistrelles across the barns.
- 3.7 Lack of Functional Foraging and Commuting Links: Automated detector and manual activity surveys established that bat activity across the site is exceptionally sparse, with the western garden providing no foraging resources or continuous, sheltered flight infrastructure.
- 3.8 The application site lacks the mature parkland or complex woodland mosaic required to functionally support the species assemblages at Cyfarthfa Castle. Consequently, the application site plays no supporting role in the maintenance of these regional populations or high-status roosts. On this basis, these castle records are not considered further within the context of this assessment.
- 3.9 There are more than 1600 records of roof nesting birds within 2km, which is not surprising given the urban nature of the locality. Many of the species recorded could use the Site.

Previous Survey Findings

- 3.10 Table 3, below, show the findings of 2022 surveys of Buildings D-H recorded the following roosts prior to any renovation works. These are illustrated in **Appendix 2**.

Building	Date	Emergence/ Entry
D	18.06.2022	No bats entered.
	08.07.2022	1 whiskered bat emerged eaves on west.
	15.08.2022	No bats emerged.
	21.06.2022	No bats emerged.
	24.08.2022	No bats emerged.
E	18.06.2022	No bats entered.
	08.07.2022	1 common pipistrelle out hole in slate on east.
	09.07.2022	1 common pipistrelle in at eaves on east.
	15.08.2022	2 common pipistrelle out hole in slate on east. 1 common pipistrelle out ridge on north.
	17.06.2022	1 soprano pipistrelle out under southern fascia.
	18.06.2022	1 soprano pipistrelle in under southern fascia.
F	21.06.2022	No bats emerged.
	08.07.2022	1 common pipistrelle out under southern fascia.
	09.07.2022	2 common pipistrelles in under southern fascias. 1 soprano pipistrelle in above door on south.
	15.08.2022	1 soprano pipistrelle out from southern fascia.
	24.08.2022	1 soprano pipistrelle out from hip ridge cover on east.
	26.08.2022	1 whiskered/Brandt's bat emerged from hip apex on east.
G	17.06.2022	No bats emerged.
	21.06.2022	No bats emerged.
	09.07.2021	No bats entered.
	24.08.2022	No bats emerged.
	26.08.2022	No bats emerged.
H	17.06.2022	No bats emerged.
	21.06.2022	No bats emerged.
	09.07.2022	No bats entered.
	24.08.2022	No bats emerged.
	26.08.2022	No bats emerged.

Table 3. Results of night-time bat surveys 2022.

Site Setting

- 3.11 The Site is located within the town of Merthyr Tydfil. There is residential accommodation immediately to the south and again to the west, with the north and east being bordered by Brecon Road and Cyfarthfa Road. Despite the very urban location, a large park, with lake, lies immediately beyond Brecon Road to the north.

Previous Licensable Works

- 3.12 The licensed restoration works incorporated a range of bat mitigation features designed to replicate and enhance roosting opportunities previously available within the buildings D-H under Licence S093109-2, as illustrated in **Appendix 3**.
- 3.13 Bat access slates were installed as follows:
- Building G: one on the eastern elevation;
 - Building F: one on the eastern elevation, four on the southern elevation and one on the western elevation;

- Building E: two on the eastern elevation, two on the western elevation, one on the northern elevation and one on the southern elevation;
 - Building D: two on the western elevation; and
 - Building H: four on the northern elevation.
- 3.14 Fascia board access features were also incorporated:
- Building G: two on the western elevation;
 - Building F: two on the western elevation and ten on the southern elevation; and
 - Building E: a minimum of two access points on each elevation.
- 3.15 A breathable roofing membrane was used throughout. Bespoke plywood roost chambers were installed beneath all bat access slates. These chambers were fitted between the battens and membrane, aligned directly with the access slate opening and designed to provide secure roosting opportunities while preventing bats from accessing the wider roof structure.
- 3.16 Fascia and barge board access features were constructed with minimum dimensions of 20 mm deep by 50 mm wide and led into enclosed crevice spaces designed to replicate existing roosting locations. Access beyond these features into the main roof void was prevented.
- 3.17 At the request of NRW, a dedicated brown long-eared bat roost void was created within Building G in the area where bat droppings had previously been recorded. The void measured approximately 2.2 m by 5.5 m, with a maximum apex height of 1.8 m. Access was provided via bat access slates on both the eastern and western roof slopes and a fascia access feature on the eastern elevation.
- 3.18 A bat hibernation box was also installed on the northern elevation of Building D to compensate for the loss of potential hibernation features.

Building Assessment

- 3.19 The descriptions of Buildings B and C are reproduced from Ecology Planning Bat Report 1703/02e (2022). A review undertaken in 2025 confirmed that no structural alterations had occurred and there had been no material change to the condition, extent or suitability of potential bat roost features. The original descriptions therefore remain valid and are presented unchanged for consistency with previous survey work.
- 3.20 The descriptions below should be read in conjunction with **Appendix 1 - Photographs**. For photographs of Buildings D-H, please see Ecology Planning Bat Report 1703/02e (2022).
- 3.21 Buildings D-H have been fully restored and are now inaccessible to bats other than through the provision described above. The original description of the buildings can be found in Ecology Planning Bat Report 1703/02e (2022).

Building B

- 3.22 Building B is a large traditional two storey brick built barn, with integrated gateway, effectively dividing the building into an eastern section and western section.

Building B – Eastern Section

- 3.23 The rough stonework is in reasonable condition, with the majority well pointed, although some deep crevices exist on both the northern and southern elevations. The simple pitched roof is clad with small concrete tiles with a concrete ridge. There are raised/missing tiles in at least two locations and section of ridge missing, allowing plenty of access for bats.
- 3.24 There are several doors on the southern side, with one being very poorly fitting allowing access into the internal space.

- 3.25 The stonework on the eastern elevation is in similar condition, with several crevices present at near the apex. There is a circular opening below the apex, allowing free flight into the first floor. Below this is a larger arched opening, with vertical grills, also leading to the upper floor. There are no fascia boards present and the verges are very gappy.
- 3.26 The ground floor comprises several rooms, with the western two being well sealed. The western end is partitioned into several rooms and is limed walls, which are cracking and peeling in places. The ceiling is very unsafe, with several broken/missing sections, allowing flight to the first floor. The floor was clean and thorough survey was possible. One fresh segmented dropping was recorded in the north eastern corner.
- 3.27 The roof is a tie and collar beam construction with supporting struts and the first floor is open to the roof. The roof frame is traditionally pegged and these joints appear to be tightly sealed, although it was not possible to view these closely. There is a bitumen felt throughout which is torn in several places, with sizable gaps and holes, easily accessible to bats.
- 3.28 The entire first floor is open on the western side and is used extensively by jackdaws and pigeons. The floor is in poor condition and is covered with nesting debris. The entire internal space is well lit from open windows on the east and the open western side.

Building B – Western Section

- 3.29 The Western Section is of the same construction as the eastern section, with similar opportunities for bats present. The western gable end wall contains numerous crevices in the stonework, particularly along the verges where some stones appear to missing and gaps are extensive.
- 3.30 There is free flight connectivity between the ground and upper floor. The upper floor is light internally, being well lit by an arched window on the western elevation. Internally the roofing felt is in good condition. The main upper floor space is unsuitable for bats, being open, light, draughty and heavily used by birds. However, suitable crevice opportunities are present within the stonework and the tile/felt void.
- 3.31 No evidence of bats was recorded but the upper floor was not safe to inspect.
- 3.32 Building B is considered to have high potential to support roosting bats.

Building C

- 3.33 Building C is a traditional stable building forming the western side of the courtyard. It is a single storey building of rough stone construction, supporting a half pitched roof. The rear (west of the building) rises to two storey height and is of stone and brick construction. There are numerous gaps and crevices within the western wall. The stonework on the eastern aspect is in good condition.
- 3.34 The half pitched roof slopes towards the east and is clad with artificial slate tiles. The roof is in reasonable condition, although it is bowed in one part on the eastern elevation, resulting in a raised section below the bottom course of tiles, which can be accessed by bats. The ridge, comprising overlapping concrete tiles, is mostly in good condition, except either end where at least three ridge tiles are entirely missing on each end. The lead flashing is raised in several places where the building adjoins Building B.
- 3.35 The windows and door on the east are in excellent condition and tightly fitting. The small windows at first floor height on the west are grilled with vertical bars, possibly allowing bat access. The timber fascia boards are in good condition but appear to have a gap beneath for the entire length of the western elevation.
- 3.36 Internally there is a mezzanine loft running the length of the Building. The internal roof structure is a collar beam with strut construction, which created a relatively cluttered loft space. There is

bitumen felt throughout which is in good condition bar a single hole. Given the lack of an entire ceiling, the loft is well lit from the large ground floor windows. The loft was clean and able to be inspected. No evidence of bats was recorded.

3.37 Building C is considered to have moderate potential to support roosting bats.

Night-Time Surveys

3.38 The recorded roosts are shown in **Table 3**, below. These are also illustrated in **Appendix 4**.

Building	Emergence (results from all surveys combined)
B	Common pipistrelle out of stonework on S
	Common pipistrelle out of slate on S
	Common pipistrelle out of ridge
	Common pipistrelle out at verge on SW corner
C	Common pipistrelle out at verge on S
	Soprano pipistrelle out at eaves on W
D	No bats emerged
E	1 common pipistrelle bat slate on east
F	1 common pipistrelle out at eaves on south
	1 common pipistrelle out bat slate on west
	1 common pipistrelle out at bat slate on south
G	No bats emerged
H	No bats emerged

Table 3. Results of night-time bat surveys.

Buildings B and C

3.39 The results for Buildings B and C are summarized below in Table 4, below.

Building	Date	Result Notes
B	23/07/25	21:45 First pipistrelle bat recorded but not seen. Distant pass. 22:08 – 22:29 Three further common pipistrelle passes.
		20:30 First common pipistrelle detected on Site 20:30 Common pipistrelle out of stonework on S 20:50 Common pipistrelle out at verge on SW corner
	24/08/25	20:30 – 21:20 Seven further common pipistrelle passes, the first three of which were visible to the north of the buildings. 21:23 Distant noctule pass 21:24 Soprano pipistrelle pass
	25/08/25	21:12 First common pipistrelle recorded (not seen) 21:22 Common pipistrelle pass (not seen)
	21/09/25	19:05 First common pipistrelle pass detected 19:42 Common pipistrelle out of stonework on S 19:50 Common pipistrelle flew into the same stonework gap and emerged again. 19:21-20:09 Seven common pipistrelle passes, the majority to the north along the road

C	C 23/07/25	21:32 First common pipistrelle pass, not seen 22:00 Feint noctule pass 22:24 Unidentified pipistrelle pass to the north
	28/07/25	21:20 First non-echolocating pipistrelle pass 21:24 Soprano pipistrelle out at eaves on W 21:39 Common pipistrelle out of ridge 21:35 Two soprano pipistrelle bats foraging along the road 21:41 – 22:17 A total of four common pipistrelle passes 21:55 Noctule pass flying north to park 21:58 Soprano pipistrelle foraging within courtyard
	25/08/25	20:05-21:32 A total of eight common pipistrelle passes and one unidentified pipistrelle passes recorded. Two of these were distant and unseen. No pattern to behaviour, with bats passing through the courtyard to north and south.

Table 4. Results of 2025 Emergence Surveys

- 3.40 The dusk emergence surveys confirmed the presence of individual, crevice-dwelling bats utilizing Buildings B and C as low-status day roosts.
- 3.41 *Building B*: confirmed as a day roost for common pipistrelle, with a total of four individual emergences recorded from distinct structural features across the building. These included one individual emerging from external stonework on the southern elevation, one from beneath an adjacent roofing slate on the southern elevation, one from the main ridge line, and one from the verge on the south-western corner.
- 3.42 *Building C*: confirmed as a day roost for both common pipistrelle and soprano pipistrelle (*Pipistrellus pygmaeus*). A single common pipistrelle emerged from the southern verge, while a single soprano pipistrelle emerged from the western eaves.
- 3.43 *Foraging, Commuting, and Spatial Behaviour*: An evaluation of the flight paths and real-time detector data indicates that the overall volume of bat activity across the survey area was notably low, with no established high-traffic commuting corridors or significant foraging areas identified.
- 3.44 Upon leaving their respective roost features, the bats exhibited dispersal rather than following a unified linear landscape feature. A proportion of the emerged bats briefly circled within the central courtyard, before moving away to the south. Other individuals immediately gained were recorded flying directly over the rooflines of Buildings B and C towards the parkland habitat situated to the north. With the exception of two soprano pipistrelle bats foraging within the Courtyard on one occasion, the vast majority of bats exited the Site promptly with no further foraging behaviour recorded.
- 3.45 Crucially, the garden plot located immediately to the west of the structures was completely devoid of bat activity. No foraging behaviour, social calling, or sustained flight loops were recorded within this zone. The data suggests that the western garden lacks the complex structural vegetation or insect biomass required to serve as a functional foraging resource. Furthermore, the roadside hedgerow was no recorded to function as a sheltered flight route. The site's value is therefore strictly restricted to small numbers of individual opportunistic day roosts, with the surrounding landscape providing the primary foraging and commuting infrastructure.

Buildings D-H

- 3.46 The monitoring surveys undertaken between July and August 2025 confirmed that bat roosting activity is restricted to low numbers of individual bats within Buildings E and F. No bat emergence was recorded from Buildings D, G, or H during their respective survey windows.

- 3.47 The monitoring report as submitted to NRW is provided at Appendix 6.
- 3.48 *Building D (24/07/2025)*: No bat emergence or re-entry activity was recorded. The building was negative for roosting bats on this survey date.
- 3.49 *Building E (15/08/2025)*: Confirmed as a day roost for low numbers of soprano pipistrelle. A total of two individuals were recorded emerging from access points on the eastern elevation of the structure.
- 3.50 *Building F (15/08/2025)*: Confirmed as a day roost for multiple individual common pipistrelles, demonstrating decentralized roosting across multiple elevations. A total of four common pipistrelles emerged from the structure: two individuals from access slates on the southern elevation, one individual from an access point on the eastern elevation, and one individual from an access slate on the western elevation.
- 3.51 *Building G (15/08/2025 & 16/08/2025)*: No bat emergence was recorded during either the multi-building survey on 15 August or the subsequent survey on 16 August.
- 3.52 *Building H (16/08/2025)*: No bat emergence or re-entry activity was recorded. The building was negative for roosting bats on this survey date.
- 3.53 *Automated Detector Activity*: Overall bat activity across the site during these monitoring periods remained exceptionally low. Automated detectors positioned within the internal voids of the structures recorded zero bat activity, confirming the absence of any internal roosting or significant internal flight.
- 3.54 The results of the 2025 surveys were consistent with those obtained in 2022, with emergence activity remaining at a similar level and dominated by common pipistrelle bats.

Garden Habitats

- 3.55 The garden was divided into two distinct sections as shown in Appendix 5 – Habitat Features.
- 3.56 The western section comprised a regularly mown amenity grassland lawn. The sward was species-poor and dominated by perennial rye-grass (*Lolium perenne*), with occasional white clover (*Trifolium repens*), daisy (*Bellis perennis*), ribwort plantain (*Plantago lanceolata*), dandelion (*Taraxacum* agg.), creeping buttercup (*Ranunculus repens*) and yarrow (*Achillea millefolium*).
- 3.57 The northern boundary of the western section, adjacent to Brecon Road, comprised a tall and unmanaged former hedgerow which had developed into a gappy line of trees and shrubs. Species present included Leyland cypress (*Cuprocyparis × leylandii*), silver birch (*Betula pendula*), elder (*Sambucus nigra*), ash (*Fraxinus excelsior*), hawthorn (*Crataegus monogyna*) and cotoneaster (*Cotoneaster* sp.). All specimens were semi-mature, with no trees exceeding 20 cm diameter at breast height.
- 3.58 The western boundary comprised a similar but more fragmented line of scattered trees and shrubs, interspersed with gaps and supplemented by a fence separating the Site from neighbouring residential properties. Species composition was broadly similar to the northern boundary and consisted principally of semi-mature specimens with limited structural diversity.
- 3.59 The eastern section comprised a small area of amenity grassland surrounding a single dwarf apple tree (*Malus domestica*), although the majority of the area was occupied by ornamental introduced shrub planting. The northern boundary adjacent to Brecon Road consisted of a dense evergreen cherry laurel hedge (*Prunus laurocerasus*) approximately 4 m in height.
- 3.60 The eastern boundary comprised a stone wall supporting a linear hedge dominated by holly (*Ilex aquifolium*). Occasional shrubs and small trees were present including elder (*Sambucus nigra*), ash (*Fraxinus excelsior*), holly (*Ilex aquifolium*) and dog rose (*Rosa canina*). The wall itself supported extensive bramble (*Rubus fruticosus* agg.) and ivy (*Hedera helix*).
- 3.61 Overall, the garden comprised common habitats associated with a managed domestic setting and was of low ecological value.
- 3.62 The northern boundary of the eastern section is best described as a remnant hedgerow which has become a discontinuous line of scattered trees and shrubs. The boundary was dominated by a mixture of common native and introduced species including hawthorn (*Crataegus monogyna*), Leyland cypress (*Cuprocyparis × leylandii*), silver birch (*Betula pendula*), elder (*Sambucus nigra*), ash (*Fraxinus excelsior*) and cotoneaster (*Cotoneaster* sp.). The feature was gappy throughout its length and lacked the structure and species diversity typically associated with ecologically valuable hedgerows.
- 3.63 No trees of notable size were present, with all specimens measuring less than 20 cm diameter at breast height. The boundary is located immediately adjacent to the heavily trafficked Brecon Road and is subject to high levels of disturbance from noise, lighting and vehicle movements. As a result, its suitability for protected species is limited. The feature offers negligible bat roosting potential and provides only limited nesting opportunities for low numbers of common bird species.

Other Protected Species

- 3.64 Significant evidence of nesting jackdaw (*Corvus monedula*) and feral pigeon (*Columba livia domestica*) was recorded within the upper floor and loft space of Building B during surveys undertaken in summer 2025. At that time, birds were able to access the loft via an opening associated with the gateway structure. This access route appears to have been closed during late

2025, and no evidence of continued access was observed during the habitat assessment in March 2026.

4. Legislation and Conservation Context

Legislation

Bats

- 4.1 All species of bat and their roosts are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). It is an offence to:
- Deliberately capture, injure or kill a bat;
 - Deliberately disturb bats in a manner likely to impair their ability to survive, breed, rear young or significantly affect local distribution or abundance;
 - Damage or destroy a breeding site or resting place (roost), whether or not bats are present at the time; and
 - Possess, transport, sell or exchange bats or parts of bats without lawful authority.
- 4.2 Where development has the potential to affect bats or their roosts, a licence may be required from Natural Resources Wales (NRW).

Birds

- 4.3 All wild birds, their nests and eggs are protected under the Wildlife and Countryside Act 1981 (as amended). It is an offence to:
- Intentionally kill, injure or take any wild bird;
 - Take, damage or destroy the nest of any wild bird while it is in use or being built; and
 - Take or destroy the egg of any wild bird.
- 4.4 Certain species receive additional protection from disturbance whilst nesting. As a result, vegetation clearance and building works with the potential to affect nesting birds should be undertaken outside the main bird breeding season (generally March to August inclusive), unless checks by a suitably qualified ecologist confirm the absence of active nests.

Hedgerows

- 4.5 Countryside hedgerows may be protected under the Hedgerows Regulations 1997. The Regulations require local planning authorities to consider whether a hedgerow qualifies as an "Important Hedgerow" based on ecological, historical and landscape criteria before removal can take place. Hedgerows meeting these criteria may be protected from removal.
- 4.6 In addition, hedgerows may provide habitat for protected species, including nesting birds and bats, and are therefore subject to the provisions of the Wildlife and Countryside Act 1981 and other relevant wildlife legislation where protected species are present.

Wales-Specific Biodiversity Duties

- 4.7 Section 6 of the Environment (Wales) Act 2016 places a duty on public authorities to seek to maintain and enhance biodiversity and promote the resilience of ecosystems when exercising their functions. Section 7 of the Act identifies habitats and species of principal importance for maintaining and enhancing biodiversity in Wales and these are material considerations in the planning process.

Local Planning Policy

- 4.8 The adopted Merthyr Tydfil Replacement Local Development Plan (LDP) 2016-2031 forms the statutory development plan for the area and provides the framework for determining planning

applications. Of particular relevance to ecology is Policy BW8 (Natural Heritage), which seeks to protect and enhance the County Borough's natural heritage and requires development proposals to maintain, enhance or avoid unacceptable harm to:

- National and local nature conservation designations;
- Trees, woodlands and hedgerows that contribute to biodiversity, landscape character or local amenity;
- Protected and priority species; and
- Ecological networks and habitat connectivity.

- 4.9 The policy supports development that safeguards biodiversity interests and incorporates appropriate mitigation, compensation and enhancement measures where ecological features may be affected.
- 4.10 In addition, the LDP reflects the requirements of the Environment (Wales) Act 2016, including the duty to maintain and enhance biodiversity and promote ecosystem resilience. Development proposals are therefore expected not only to avoid significant ecological harm but, where practicable, to deliver biodiversity enhancements through habitat creation, restoration or management.
- 4.11 In the context of this application, ecological considerations principally relate to bats, nesting birds and the partial removal of a boundary hedgerow. The proposals have been designed to avoid significant impacts on protected species or habitats and are consistent with the objectives of local and national planning policy.

5. Discussion and Recommendations

Evaluation

Bats

- 5.1 Bat activity recorded during the 2025 surveys was highly consistent with the findings of the 2022 survey programme. Across both survey periods, activity levels were low and typical of those expected within an urban environment characterised by a high degree of development, disturbance and artificial lighting. Despite the availability of roosting opportunities within several buildings, all identified roosts remained minor in nature, with only low numbers of bats recorded and common pipistrelle accounting for the majority of observations.
- 5.2 The level of use of the restored building D-H was very consistent with pre-works levels.
- 5.3 The surrounding habitat provides limited foraging and commuting opportunities for bats, reflecting the urban setting of the Site and the high levels of ambient lighting present. Nevertheless, larger areas of more suitable habitat occur within the wider landscape, including the parkland located to the north of the Site, which is likely to provide more attractive foraging habitat. The consistently low levels of activity recorded during surveys undertaken in both 2022 and 2025 indicate that the Site supports a small assemblage of common urban bat species and does not form a significant foraging or commuting resource.
- 5.4 The survey effort undertaken across the Site encompassed both the maternity and post-maternity periods and provides a robust assessment of bat use. The similarity of the results obtained in 2022 and 2025 demonstrates that bat use of the Site has remained stable over time and confirms the conclusions of the original assessment.
- 5.5 Buildings B and C are not suitable for hibernation.
- 5.6 The Site is of low/moderate importance for bats and the activity is largely restricted to the southern aspect of the Site.

Birds

- 5.7 Evidence of nesting jackdaw (*Corvus monedula*) and feral pigeon (*Columba livia domestica*) was recorded within the buildings. These are common and widespread species and are not of particular conservation significance. A small number of external crevices and ledges also provide limited nesting opportunities for other common bird species. No evidence was recorded of any notable or priority bird species associated with the Site.

Habitats

- 5.8 The habitats present within the survey area are typical of a managed urban garden and comprise amenity grassland, ornamental shrub planting, scattered trees and species-poor boundary vegetation. These habitats are common and widespread within the local area and are of generally low ecological value.
- 5.9 The western and eastern lawn areas comprise intensively managed amenity grassland with limited botanical diversity and negligible value for protected or notable species. The ornamental shrub planting within the eastern section is predominantly composed of introduced species and provides limited ecological interest beyond localised shelter and foraging opportunities for common wildlife.
- 5.10 Boundary features provide the principal ecological interest within the Site. The northern and western boundaries comprise fragmented lines of trees and shrubs which offer some habitat

connectivity and limited nesting opportunities for common bird species. However, these features are species-poor, heavily influenced by introduced species and subject to a high degree of disturbance associated with their proximity to Brecon Road and surrounding development. They are not considered important commuting, foraging or roosting habitat for bats.

- 5.11 The eastern boundary stone wall and associated vegetation provide some structural diversity and may support common invertebrates and nesting birds. However, these habitats are representative of the wider urban landscape and do not support any notable ecological features.
- 5.12 The northern boundary adjacent to Brecon Road is best described as a remnant hedgerow that has developed into a discontinuous line of scattered trees and shrubs. The feature is of low ecological value, does not meet the criteria of an Important Hedgerow under the Hedgerows Regulations 1997 and is not considered significant in the context of the local ecological network.
- 5.13 Overall, the Site supports habitats of low ecological value which are typical of an urban residential setting. No habitats of principal importance, statutory or non-statutory designated sites, or other features of notable ecological significance were identified within the survey area.

Impact Assessment - Bats

- 5.14 There will be significant roofing works and it is assumed that entire re-roofing will be undertaken.

Short-term impacts: disturbance

- 5.15 Buildings D–H have already been subject to licensed restoration works, including the provision of dedicated bat mitigation features. Monitoring undertaken in 2025 confirmed continued bat use of these features. As bats are now roosting within self-contained mitigation features designed to remain in situ, the proposed internal conversion works are not expected to result in disturbance to roosting bats.
- 5.16 Buildings B and C continue to support minor bat roosts and will require structural restoration as part of the proposed conversion works. Whilst the roosts recorded are small and comprise common species, any bats present at the time works commence would be vulnerable to disturbance and there is potential for direct harm if works proceed without appropriate safeguards.
- 5.17 The bat roosts recorded are of low conservation significance and comprise species that are known to utilise a range of alternative roosting opportunities within the surrounding area. Nevertheless, disturbance to individual bats and their roosts would constitute a legal impact and will require appropriate mitigation and licensing.

Long-term impacts: roost modification

- 5.18 The restoration works to Buildings D–H have already been completed under NRW licence S093109-2 and incorporated comprehensive bat mitigation and compensation measures. Monitoring undertaken in 2025 confirmed continued use of these features by bats. The conversion of these buildings to accommodation units will not alter the bat access features or dedicated roost spaces that were provided as part of the licensed scheme. Consequently, no significant long-term impacts on bat roosting opportunities are anticipated within Buildings D–H.
- 5.19 Buildings B and C continue to support minor roosts associated with external building features. The proposed restoration and conversion works will result in modifications to the existing roof structures and, in the absence of mitigation, would be likely to result in the loss of the roosting features currently used by bats. Replacement roost features will be required as part of the development.

- 5.20 The roosts recorded within Buildings B and C are of low conservation significance and are associated with common pipistrelle bats only. Subject to the provision of appropriate replacement roosting features through the NRW licensing process, the development is not expected to result in a significant long-term reduction in roost availability within the Site.
- 5.21 Monitoring of Buildings D–H demonstrates that bats readily adopted the mitigation features installed as part of the previous licensed restoration works. This provides confidence that suitably designed mitigation can maintain the favourable conservation status of the local bat population following the restoration and conversion of Buildings B and C.

Long-term impacts: roost loss.

- 5.22 The proposed restoration and conversion of Buildings B and C will result in the loss of existing roosting features associated with gaps and crevices within the building fabric. The completed development will provide a more sealed building envelope and, in the absence of mitigation, would be likely to reduce the availability of roosting opportunities currently used by bats.
- 5.23 Surveys undertaken in both 2022 and 2025 demonstrated consistently low levels of bat activity, with only minor roost use recorded and activity dominated by common pipistrelle bats. There was no evidence that any of the buildings support a maternity roost, hibernation roost or other roost of elevated conservation significance. The roosts identified are typical of common urban-dwelling bats utilising occasional crevice features.
- 5.24 Buildings D–H have already undergone licensed restoration works and now incorporate a range of dedicated bat mitigation features. Monitoring undertaken in 2025 confirmed continued bat use of these features. The conversion of these buildings to accommodation units will not result in the loss of the mitigation features or any reduction in the availability of bat roosting opportunities.
- 5.25 The survey results indicate that bats using the Site are not dependent upon any individual roost feature and that a range of alternative roosting opportunities exist within the surrounding buildings and wider urban landscape. Subject to the provision of suitable replacement roost features within Buildings B and C through the NRW licensing process, the proposals are not expected to result in a significant long-term loss of roosting habitat.
- 5.26 Overall, whilst some existing roost features within Buildings B and C will be lost as a consequence of the works, the impact is considered to be minor and can be adequately compensated through the provision of replacement roosting opportunities secured through the licensing process.

Long-term impacts: fragmentation and isolation

- 5.27 The proposals will not result in the fragmentation or isolation of bat habitats. Survey results from both 2022 and 2025 identified low levels of bat activity typical of an urban environment and did not identify any significant commuting routes or flightlines associated with the Site.
- 5.28 All trees and boundary vegetation will be retained, including the northern boundary tree line adjacent to Brecon Road. Whilst a small area of amenity grassland will be lost to accommodate a car parking area, this habitat is of negligible value to bats and its loss will not affect habitat connectivity.
- 5.29 The proposed landscaping scheme will increase the diversity of vegetation within the Site through the introduction of native species and planting of value to wildlife. This will maintain and potentially enhance opportunities for foraging and movement by common wildlife species but is likely to be of negligible benefit to bats.
- 5.30 The conversion of Buildings D–H and restoration/conversion of Buildings B and C will not create barriers to bat movement and will not affect access to the wider landscape. The Site will remain

connected to surrounding urban habitats and the larger areas of parkland and green space present nearby.

- 5.31 No significant long-term impacts arising from habitat fragmentation or isolation are therefore predicted.

Post-development interference impacts.

- 5.32 The proposed conversion of the buildings to accommodation units will introduce a modest increase in human activity within the Site, together with some external lighting associated with access, parking and residential use. Additional light spill will also arise from windows and occasional vehicle movements.
- 5.33 The Site is located within an urban environment and is already influenced by existing artificial lighting associated with Brecon Road, nearby residential properties and surrounding infrastructure. The level of additional illumination generated by the proposals is expected to be low and negligible when considered against the existing urban baseline.
- 5.34 Proposed external lighting will be directed away from confirmed and proposed bat roost features and is not expected to affect the functionality of those features. All dedicated bat mitigation features within Buildings D–H will remain available and suitable for continued use following occupation.
- 5.35 No significant commuting routes or dark corridors were identified within the Site and bats using the area are already required to navigate partially illuminated habitats. The proposed development will not materially alter these conditions.
- 5.36 Common pipistrelle was by far the most frequently recorded species during both survey periods. This species is widely recognised as being relatively tolerant of artificial lighting and commonly occurs within urban and suburban environments.
- 5.37 Taking account of the existing urban context, the low levels of bat activity recorded and the retention of suitable roosting opportunities, post-development interference effects are predicted to be negligible and are not expected to adversely affect the local bat population.

Predicted scale of impact

- 5.38 Surveys undertaken in 2022 and 2025 demonstrated that the Site supports only minor bat roosts used by small numbers of common bat species, with activity levels remaining consistently low and typical of an urban environment. The proposed works to Buildings B and C will result in the loss and modification of existing roost features and have the potential to disturb individual bats. In the absence of mitigation, the long-term loss of these roosts would be considered a low to moderate impact at the local level.
- 5.39 Buildings D–H have already been restored under NRW licence S093109-2 and now incorporate a comprehensive package of mitigation and compensation measures. Monitoring undertaken in 2025 confirmed continued use of these features by bats. The proposed conversion of these buildings to accommodation units will not affect the availability or functionality of the existing bat mitigation features.
- 5.40 In accordance with current best practice guidance set out in UK Bat Mitigation Guidelines, the roosts affected by the proposals are considered to be of low conservation significance, comprising small numbers of widespread and common species. Subject to the provision of appropriate mitigation and compensation through the NRW licensing process, including the retention and creation of suitable replacement roosting opportunities, the development is not expected to adversely affect the conservation status of any bat species.

- 5.41 Disturbance impacts associated with the works are expected to be minor and temporary, affecting only small numbers of common bats. Following implementation of mitigation, the residual impact of the development is predicted to be negligible to minor adverse and not significant in ecological terms.
- 5.42 A bat licence from Natural Resources Wales will therefore be required prior to commencement of works to Buildings B and C. Subject to implementation of appropriate mitigation measures and adherence to licence conditions, short-term impacts on bats are expected to be minor and temporary. Outline measures are provided below to demonstrate how the long-term favourable conservation status of the species will be maintained.

Impact Assessment - Birds

- 5.43 Evidence of nesting jackdaw (*Corvus monedula*) and feral pigeon (*Columba livia domestica*) was recorded within Building B during 2025. Access to the loft space appears to have subsequently been closed and no evidence of continued access was recorded during the current assessment. No notable or priority bird species were identified.
- 5.44 The proposals will not result in the loss of any trees, hedgerows or other habitats of particular value to nesting birds. Whilst a small number of common bird species may utilise boundary vegetation for nesting, all trees and boundary features along the northern boundary are to be retained.
- 5.45 Subject to works being undertaken outside the bird nesting season, or following confirmation by a suitably qualified ecologist that no active nests are present, no offences under the Wildlife and Countryside Act 1981 (as amended) will occur. Residual impacts on nesting birds are therefore considered negligible.

Impacts on Habitats

- 5.46 The proposals will result in the loss of less than one third of the northern section of amenity grassland within the western garden area to facilitate the creation of a car parking area. The habitat affected comprises species-poor amenity grassland of negligible ecological value and is common throughout the local area.
- 5.47 No trees or other boundary features will be removed as part of the proposals. The northern boundary tree line, which represents the principal habitat feature within the development area, will be retained in its entirety. As such, habitat connectivity and any limited ecological function provided by this feature will remain unchanged.
- 5.48 The proposed landscaping scheme includes the planting of native species and species selected for their biodiversity value. This will increase the structural and botanical diversity of the Site and provide enhanced opportunities for pollinating insects, birds and other common wildlife.
- 5.49 Given the low ecological value of the habitats affected and the retention of all boundary vegetation, the proposed landscaping will more than compensate for the limited loss of amenity grassland. The proposals are therefore expected to result in a neutral to minor beneficial effect on biodiversity overall.

Mitigation

Timing of Works

- 5.50 It is strongly recommended that buildings are repaired outside of the nesting bird season (March – August, inclusive) unless a visit by a suitably qualified ecologist immediately prior to works confirms that no birds are present.
- 5.51 While comprehensive survey data indicates that the application site lacks the optimal stable microclimates typically associated with major bat hibernacula, the presence of small numbers of crevice-dwelling pipistrelle bats utilizing shallow gaps, wall cavities, or structural crevices during isolated winter periods cannot be entirely ruled out.
- 5.52 To ensure compliance with relevant wildlife legislation (including the Conservation of Habitats and Species Regulations and the Wildlife and Countryside Act), high-risk invasive demolition, structural stripping, or exterior maintenance works should ideally be scheduled outside the core winter hibernation period (November to February inclusive).

Working Methods

Bats

- 5.53 All works will be subject to a licence. Minor bat roosts have been recorded at eaves, below roof covers/ridges/from beneath slates and within one stonework crevice.
- 5.54 Prior to works commencing, the licensed ecologist will give a toolbox talk on site to all contractors undertaking the works. The toolbox talk will outline the protection given to bats by law and the overall mitigation strategy and the methods required to ensure that bats are safeguarded throughout construction. It will also cover unexpected bats discovered.
- 5.55 Any stonework cavities present, including the recorded roost site, will be directly investigated with a high-powered torch and/or endoscope, as necessary. If it is not possible to fully inspect the cavity and if it is not possible to deconstruct the cavity to ensure no presence/evidence of bats inside, these crevices will be subject to a standard exclusion exercise following methodology set out in the Bat Worker's Manual. This will comprise either a Constantine device or rigid plastic flap, dependent on the best fit for the individual cavities. All timings will be carried out in accordance with the Bat Worker's Manual. Cavities will be sealed immediately to prevent use.
- 5.56 The Named Ecologist will supervise all works to recorded roost sites from height, working directly alongside contractors. Gaps at the verges will be checked immediately prior to removal. Removal will involve carefully removing roof coverings, to prevent compression of any spaces behind. The Named Ecologist will also supervise removal of the roof ridge where bats were recorded. Ridge tiles will be lifted directly upwards and the undersides checked. The Named Ecologist will then take a view as to whether the removal of further tiles requires supervision. The absence of felt across much of the Site significantly reduces the presence of suitable roost sites.
- 5.57 In the event that any bats are encountered during the works (not including the stonework), the bats will initially be left to disperse of their own accord. If bats remain in situ, and if it is safe to remove the bat (dependent on location) individuals will be removed by a licensed bat worker to an existing undisturbed features in Buildings D-H.

Bat Provision

- 5.58 There is opportunity to incorporate provision for bats within the repaired buildings. Despite numerous opportunities present, the lack of any significant roost suggest that the urban surrounds

are unsuitable for most species. Opportunities are designed to ensure both the existing roosts will be maintained and there is scope for roosts to expand.

5.59 All opportunities will be integral to ensure they remain in perpetuity.

5.60 Access will be provided for bats in both Buildings B and C, as follows:

- Bat access slates just below the ridge on both buildings. To comprise: three on north of B, three on south of B and three on east of C. These will lead into purpose built slimline timber boxes to be located beneath the access tile as has been successfully used on Building F-H.;
- A dedicated hibernation box for bats on the eastern elevation of Building B; and
- Fascia board access on: the east and west of B (five locations each); and south of C (three locations).

5.61 Access behind barge/fascia boards will have minimum dimensions of 20mm depth x 50mm width. Bats will have no access to the main roof. This will be boarded above, creating a small enclosed crevice and restricting access above to the roof. These measures have all been proven successful from the 2025 monitoring of D-H.

5.62 These will replicate opportunities where bats have been recorded roosting. Access into the internal space is not considered necessary since no evidence of bat activity internally was recorded.

Bird Provision

5.63 In order to replace lost opportunities to birds currently able to use the buildings, two nest boxes will be provided on each elevation:

- Two two-chambered integrated woodcrete sparrow boxes⁴ at a height of 3m on the eastern elevation of Building C; and
- Two integrated swift nesting boxes will be incorporated into the development on each of the eastern and western elevations of Building B. The boxes will be installed at a height of approximately 4.5 m above ground level, in accordance with current guidance published by Swift Conservation. All boxes will be positioned close to the wall tops.

5.64 The boxes will comprise a built-in design, with the final model to be agreed in consultation with the Conservation Officer. Integrated boxes are durable, have a design life exceeding 10 years and provide a more stable internal temperature than externally mounted boxes, reducing the risk of overheating. Concern has been raised regarding overheating of the swift boxes on the western elevation. If the boxes are integrated then this is unlikely to be an issue but if integration is an issue then these will be relocated to the northern elevation of Building B under the guidance of a suitably qualified Ecologist. From previous discussions with the conservation officer, it is assumed that integrated options are preferable.

5.65 Swift records are known from the local area and the provision of dedicated nesting features will contribute to the availability of nesting opportunities for this declining species within the urban environment. There will be no provision on the southern elevation. All bird provision will be in place prior to use of the buildings.

Post-Development Disturbance.

5.66 External lighting is necessary for safety and security purposes; however, the lighting scheme will be designed to minimise ecological impacts. All luminaires will be hooded and directed downwards to

prevent unnecessary light spill onto retained habitats and bat roost features. Warm-coloured bulbs will be used and lighting will operate on motion sensors and timers where appropriate, ensuring illumination is provided only when required.

- 5.67 The Site is located within an urban environment and is already influenced by existing artificial lighting associated with Brecon Road, nearby residential properties and surrounding infrastructure. The level of additional illumination generated by the proposals is expected to be low when considered against this existing baseline.
- 5.68 Proposed lighting will be directed away from confirmed and proposed bat roost features and will not illuminate bat access points. All dedicated bat mitigation features within Buildings D–H will remain available and suitable for continued use following occupation, whilst replacement roost features within Buildings B and C will be designed to maintain dark access conditions.
- 5.69 Taking account of the existing urban context, the low levels of bat activity recorded, the retention of suitable roosting opportunities and the implementation of a sensitive lighting scheme, post-development disturbance effects are predicted to be negligible and are not expected to adversely affect the local bat population.

Habitat Enhancement

- 5.70 The majority of the existing amenity grassland within the Site will be retained. Opportunities exist to enhance the biodiversity value of these areas through the introduction of native and wildlife-friendly planting, increasing structural and botanical diversity within the garden.
- 5.71 New planting will comprise a mixture of native shrubs and flowering species of known value to pollinating insects, birds and other wildlife. Species selection will seek to provide a range of nectar, pollen, berry and seed resources throughout the year, whilst remaining appropriate to the residential setting and character of the Site.
- 5.72 The northern boundary will be strengthened through supplementary planting to infill existing gaps within the fragmented tree and shrub line.
- 5.73 The existing non-native hedgerow species (Leyland cypress, cotoneaster and cherry laurel) will be removed and replaced with new planting of the same mix. This will create strong boundary features, which is beneficial for privacy and wildlife. The species mix will be as follows:
- Hawthorn (*Crataegus monogyna*): 50%: This will form the dense structure with spring blossom.
 - Blackthorn (*Prunus spinosa*): 15%: Provides early white flowers as a valuable early nectar resource and autumn fruit.
 - Holly (*Ilex aquifolium*) 10%: Provides year-round evergreen privacy.
 - Hazel (*Corylus avellana*): 10%: Balances the texture with broad summer leaves and winter catkins.
 - Field Maple (*Acer campestre*): 10%: Introduces distinctive autumn foliage for high aesthetic value.
 - Dog Rose (*Rosa canina*): 5%: Weaves through the base with summer flowers and autumn fruit.
- 5.74 The proposed planting will improve habitat structure, provide additional nesting and foraging opportunities for common bird species, and increase the availability of nectar and pollen sources for invertebrates. The strengthened boundary planting will also enhance local habitat connectivity and improve the ecological value of the Site.

- 5.75 The proposed habitat enhancements will more than compensate for the limited loss of species-poor amenity grassland associated with the development and are expected to result in a minor net gain in biodiversity at the Site.
- 5.76 Subject to agreement with the Conservation Officer, integrated invertebrate bricks will be incorporated into the external walls of Buildings B and C. These features will provide nesting and refuge opportunities for solitary bees and other invertebrates and will contribute to the biodiversity value of the restored buildings without affecting their architectural character.
- 5.77 A hedgehog house will be installed within a quiet location adjacent to the strengthened boundary vegetation. This will provide shelter opportunities for hedgehog and other small wildlife.
- 5.78 Currently there is access into the Site for hedgehog. However specialized gaps measuring 13 cm by 13 cm (5" x 5") will be integrated into new fences or boundary lines. This specific sizing is large enough to allow adult hedgehogs to pass through freely to access the foraging resource and nesting box, while remaining small enough to deter most domestic pets.

Conclusion

- 5.79 To assist the Local Planning Authority in evaluating the scheme against local and national planning policies, the ecological measures have been clearly separated into *Compensation* (addressing direct impacts) and *Enhancement* (delivering net biodiversity gains). These interventions are proportionate to the existing baseline biodiversity, the urban context of the site, the scale of the impacts, and the proposed change of use.

Compensation (Mitigating Lost Opportunities)

- 5.80 The planned renovation of the barns will unavoidably alter structural features. To compensate for the loss of the recorded low-status day roosts, the following measures are integrated directly into the structural design:
- Integrated Bat Features: The installation of permanent bat access points within the renovated fabric of the barns.
 - Long-Term Security: Because these features are structurally integrated rather than externally mounted, they ensure the long-term, maintenance-free security of roosting opportunities for local *Pipistrellus* populations.

Enhancement (Measurable Ecological Gain)

- 5.81 To fulfil planning requirements for positive biodiversity enhancement, the project will implement a suite of habitat and species-specific upgrades that exceed baseline requirements:
- Nesting & Shelter Opportunities : The installation of integrated bird nest boxes and a dedicated hedgehog house within the large garden area.
 - Invasive Species Removal: The complete eradication and replacement of ecologically poor, non-native garden species, specifically Cherry Laurel, Cotoneaster sp. and Leyland Cypress.
 - Native Habitat Creation: The introduction of a diverse, native hedging mix (including Hawthorn, Blackthorn, and Holly) to replace the non-native species and to structurally strengthen the existing, defunct former hedgerow line.
- 5.82 This dual approach ensures that the impacts to protected species are compensated through the proposed development, while the native planting and bird boxes targeted to a declining species deliver a permanent, and proportionate ecological enhancement within the Site.

Compliance

- 5.83 The measures summarised above set out an opportunity to ensure opportunities for birds and bats remain in the long term and ensure that impacts are minimised throughout works.
- 5.84 It is always challenging to provide a biodiversity enhancement when buildings only are affected by work and there is limited external space. However, the long term security of bat roosting opportunities will be maintained, not only of recorded sites, but further potential sites. The specific provision for two declining bird species is also considered a positive enhancement. In the absence of repair works, eventually the buildings will become less suitable and this security in the long term is considered a realistic enhancement measure.
- 5.85 It is anticipated that the precise details of the proposed landscaping can be secured through an appropriately worded planning condition requiring the submission and approval of a detailed planting scheme prior to commencement of development.
- 5.86 All measures relating to bats will be implemented under the provisions of a licence issued by Natural Resources Wales, ensuring that works are undertaken in accordance with approved mitigation, compensation and monitoring requirements.
- 5.87 The implementation of measures for nesting birds and wider biodiversity enhancement can be secured through appropriately worded planning conditions requiring the provision of the features and habitat enhancements outlined within this report..

Appendix 1 - Photographs



Photograph 1. Building B. The gated access on the northern elevation.



Photograph 2. Building B. The gated access on the southern elevation.



Photograph 3. Building B, eastern section. The rough stonework on the southern elevation.



Photograph 4. Building B, eastern section. The eastern elevation with gappy verges.



Photograph 5. Building B. The roof structure above the central gated section.



Photograph 6. Building B, eastern section. The tie and collar beam roof construction.



Photograph 7. Building B, eastern section. Gaps beneath fascia boards on the northern elevation.



Photograph 8. Building B, eastern section. Further gaps beneath fascia boards.



Photograph 9. Building B, western section. The western elevation (adjacent to Building C).



Photograph 10. Building B, western section. Gappy verges on the western elevation.



Photograph 11. Building B, western section. The first floor.



Photograph 12. Building B, western section . The tie and collar beam roof construction.



Photograph 13. Building C, southern half of the eastern elevation.



Photograph 14. Building C, northern half of the eastern elevation, with missing ridge tiles and bowing of roof visible.



Photograph 15. Building C. The western elevation.



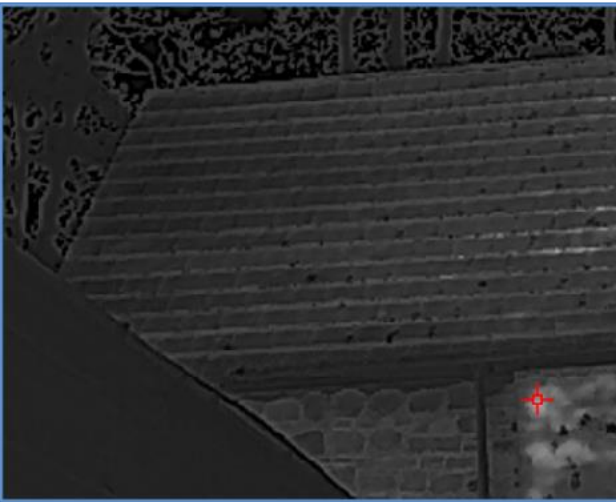
Photograph 16. Barn C. The internal roof construction and mezzanine loft.



Photograph 17. View of eastern end of Building B.



Photograph 18. View of southern part of Building B.

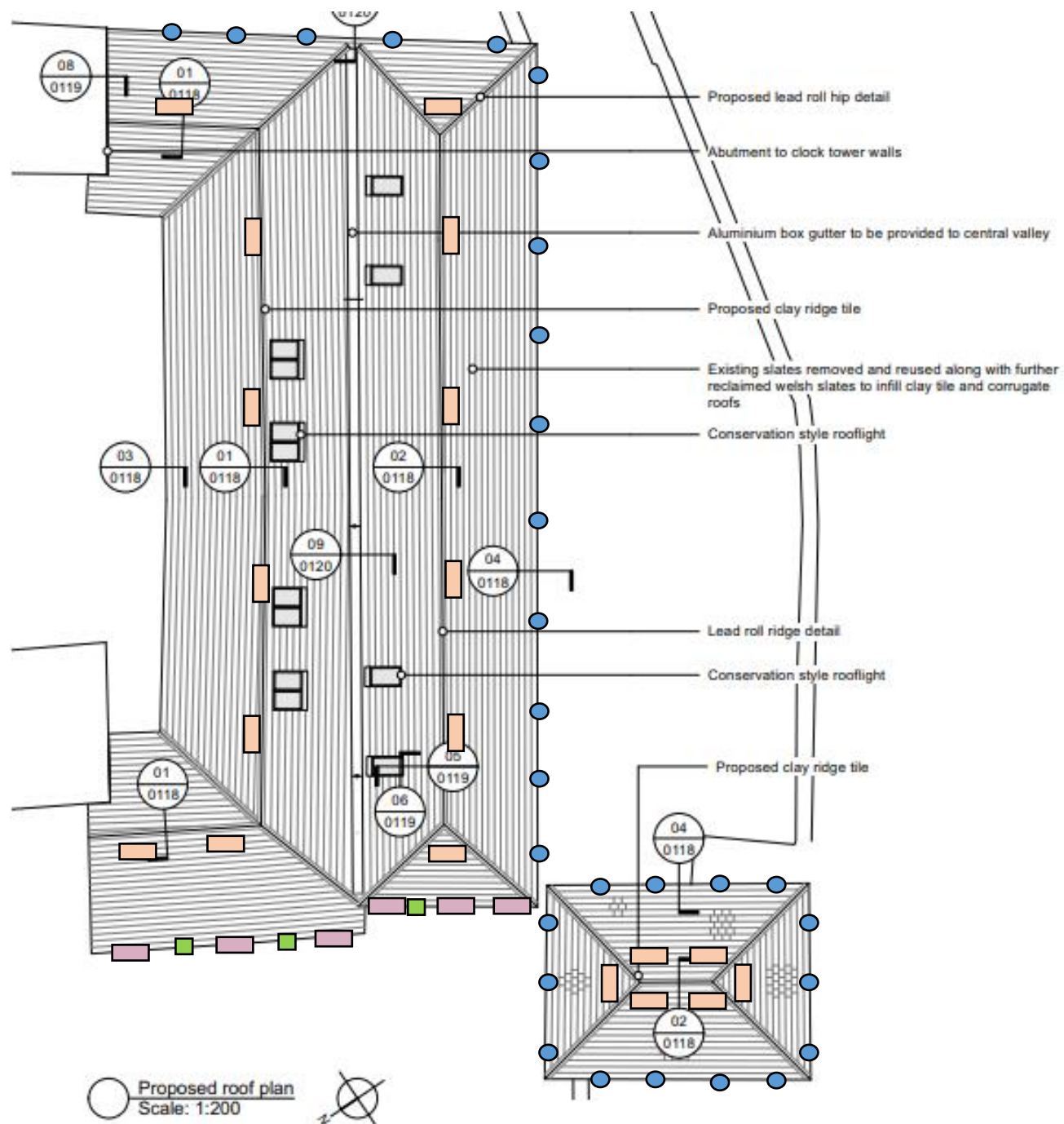


Photograph 19. View of the roof of Building B.



Photograph 20. View of Building C.

Appendix 1 – Bat Access in Building D-H



KEY

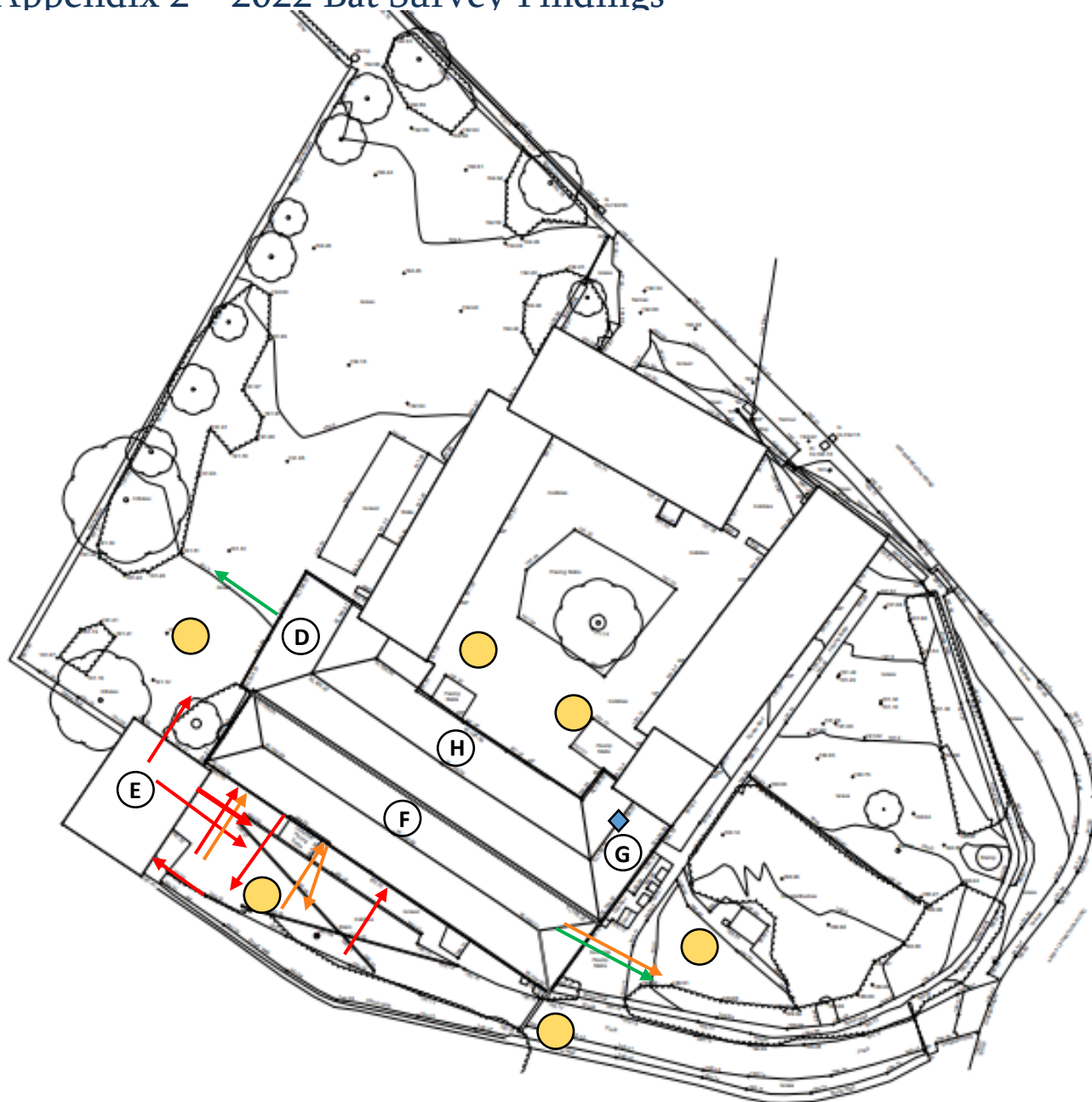
-  Bat Access Tile
-  Fascia Board Access
-  Sparrow Nest Box
-  Swift Box

Not to scale

Ecology Planning
Ecological Planning Advice and
Protected Species Surveys

Project: Pandy Farm
Drawing Number: 1703/ 02
Drawn by: RJB
Date 12/11/22

Appendix 2 – 2022 Bat Survey Findings



KEY

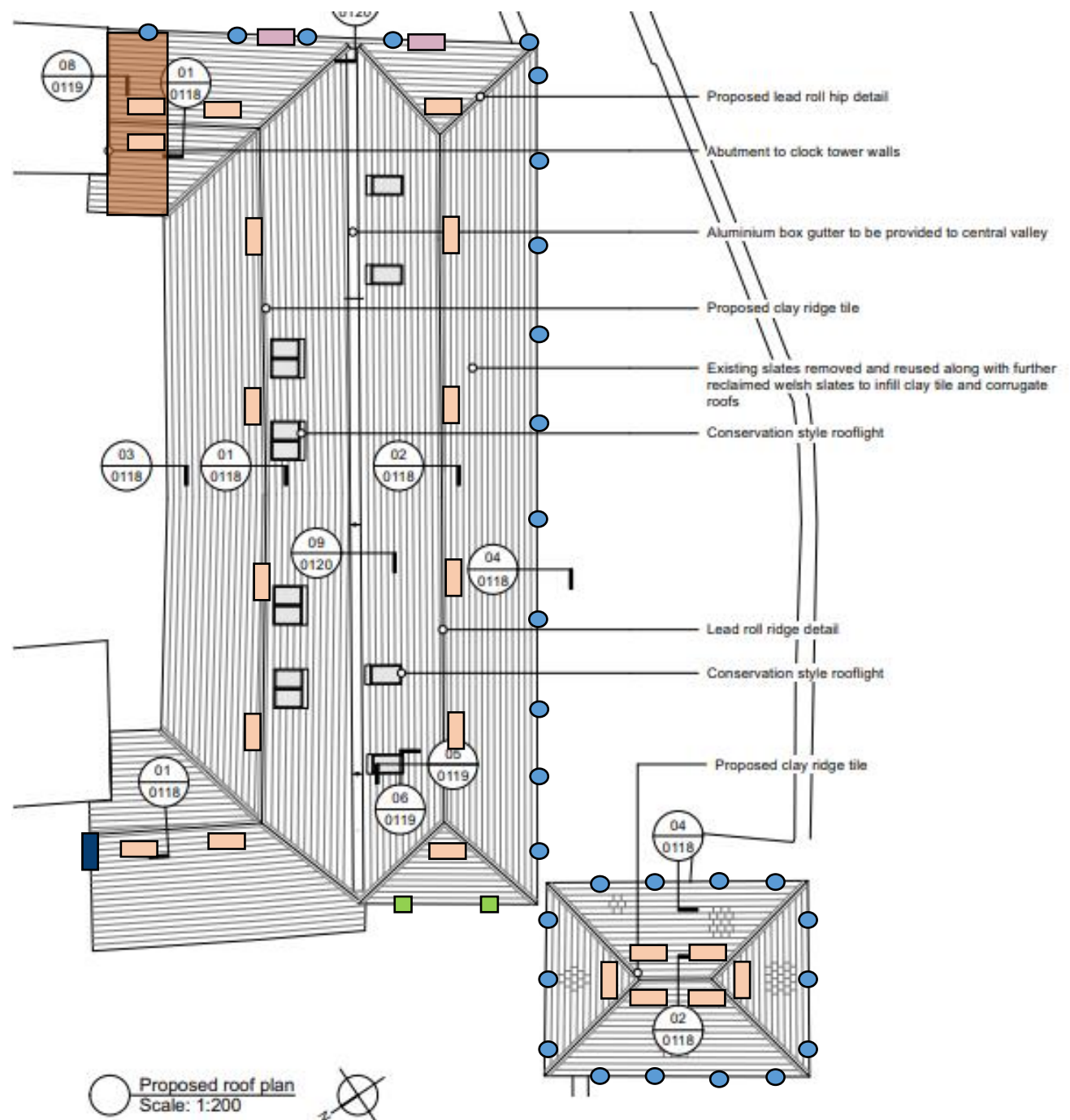
-  Surveyor Location
-  Small number of unidentified droppings
-  Common pipistrelle
-  Soprano pipistrelle
-  Whiskered bat



Ecology Planning
Ecological Planning Advice and
Protected Species Surveys

Project: Pandy Farm
Drawing Number: 1703/ 01
Drawn by: RJB
Date 07/11/22

Appendix 3 – Implemented Mitigation Measures (Buildings D-H)



KEY

-  Bat Access Tile
-  Fascia Board Access
-  Sparrow Nest Box
-  Swift Box
-  Bat Hibernation Box
-  Bat Loft

Not to scale

Ecology Planning

Ecological Planning Advice and
Protected Species Surveys

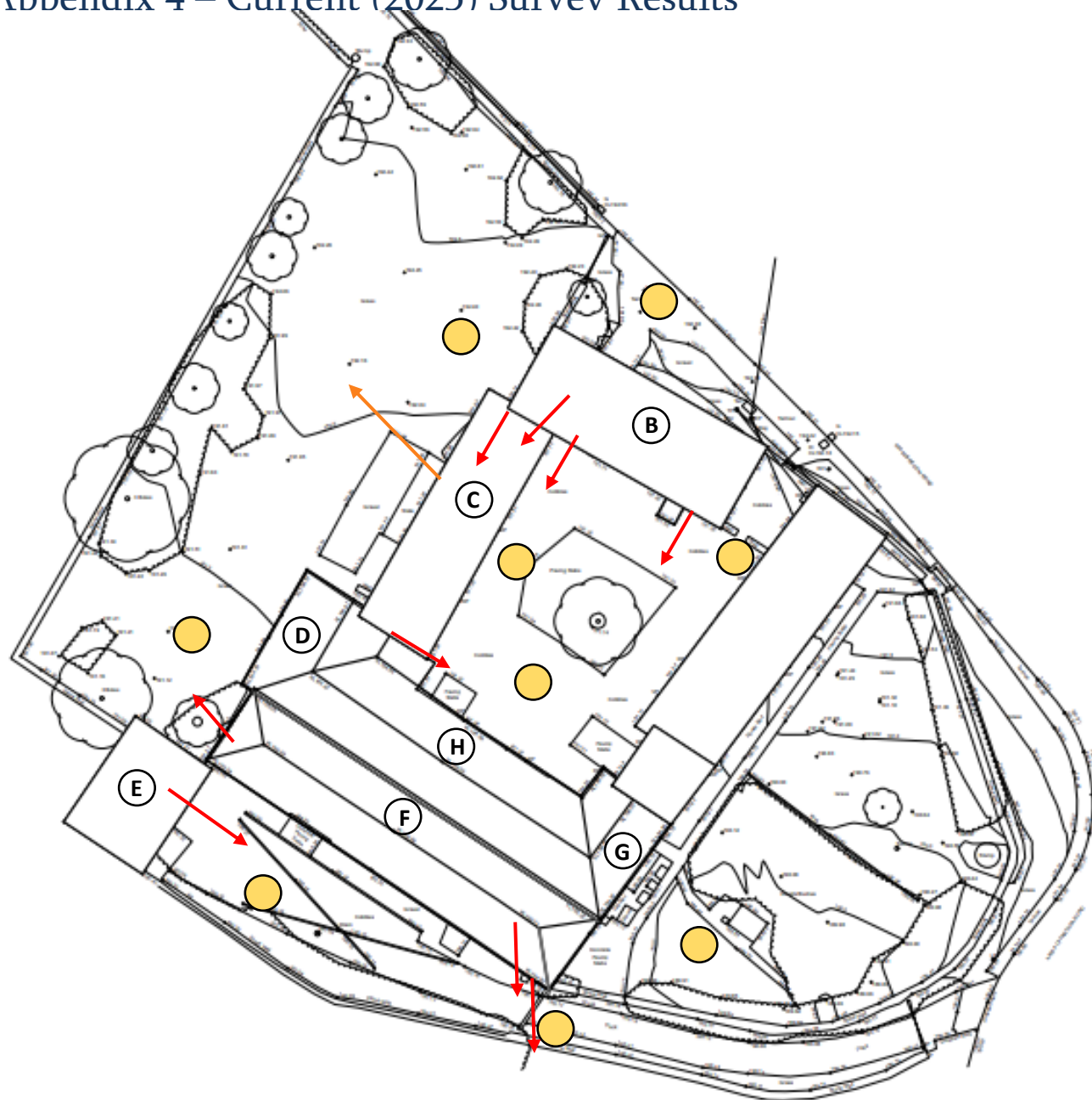
Project: Pandy Farm

Drawing Number: 1703/ 02b

Drawn by: RJB

Date 21/03/23

Appendix 4 – Current (2025) Survey Results



KEY

COMBINED SURVEY

-  Surveyor Location
-  Soprano pipistrelle
-  Common pipistrelle



Not to scale

Ecology Planning

Ecological Planning Advice and
Protected Species Surveys

Project: Pandey Farm

Drawing Number: 1703/ 03

Drawn by: RJB

Date 07/10/25

Appendix 5 – Habitat Features



KEY

-  Site boundary
-  Amenity grassland
-  Scattered tree
-  Species poor hedgerow (largely non-native)
-  Defunct hedgerow
-  Introduced shrub
-  Scrub (bramble)

 Not to scale

Ecology Planning
Ecological Planning Advice and
Protected Species Surveys

Project: Pandy Farm
Drawing Number: 1703/ 04
Drawn by: RJB
Date 17/08/26

Appendix 6 – Monitoring Report submitted as Part of NRW Licence Return



Template Monitoring Report Form

This template Monitoring Report Form is to be completed in line with required monitoring conditions which are included in your European Protected Species Licence. The information given in this form will be used to determine the impact of the development on the favourable conservation status of the species concerned (Regulation 55(9) (b) of the Conservation of Habitats and Species Regulations 2017) and the success or failures of the mitigation which has been constructed for both compensation and enhancement of the site for the species which the licence was granted. It must be prepared by a professional consultant ecologist or other suitably qualified person.

Species Permitting Team, Natural Resources Wales, Maes-y-Ffynnon, Penrhosgarnedd, Bangor, Gwynedd, LL57 2DW.

Telephone: 03000 653 000

Email: specieslicence@naturalresourceswales.gov.uk

Ebost: trwyddedrhywogaeth@cyfoethnaturiolcymru.gov.uk

Online: <http://naturalresources.wales/permits-and-permissions/protected-species-licensing/?lang=en>

YOUR LOCAL BIOLOGICAL RECORDS CENTRE

Natural Resources Wales strongly advises all biological data associated with this licence is shared with your Local Biological Records Centre. It is vital you upload data to help meet our shared conservation objectives and help inform future surveys and licence applications. Please contact your local records centre directly via the website www.lrcwales.org.uk

Please confirm the records associated with this licence have been sent to the local records centre by ticking this box. ☒

EPS Licence Reference Number:	S093109-2
List all species included on the licence:	Common Pipistrelle (<i>Pipistrellus pipistrellus</i>), Soprano Pipistrelle (<i>Pipistrellus pygmaeus</i>), Brown Long Eared (<i>Plecotus auritus</i>) and Whiskered (<i>Myotis mystacinus</i>) bats;
Full Site Address:	Pandy Farm Brecon Road Merthyr Tydfil CF47 8PA

Completed By:	Rebecca Bohane Ecology Planning Carnau Pen-y-Bont Carmarthen SA33 6QA
Date of this report:	31/10/25

Background and Supporting Information

A Background Information

A1. Summary of the baseline surveys undertaken

Type of pre-licence survey(s) carried out	Date/s	Result
<i>For example:</i>		
<i>Visual inspection of buildings</i>	<i>08/04/22</i>	<i>10 Droppings (brown long-eared confirmed by DNA analysis) in Building G</i>
<i>Dusk/Emergence surveys</i>	<i>17/06/22 – 26/08/22</i>	<u>Building D</u> 1 common pipistrelle out hole in slate on east. <u>Building E</u> 2 common pipistrelle out hole in slate on east. 1 common pipistrelle out ridge on north 1 soprano pipistrelle out under southern fascia <u>Building F</u> 1 soprano pipistrelle out from southern fascia 1 soprano pipistrelle out from hip ridge cover on east. 1 whiskered/Brandt's bat emerged from hip apex on east.
<i>Dawn surveys</i>	<i>18/06/22 and 19/07/22</i>	<u>Building E</u> 1 soprano pipistrelle in under southern fascia

		<u>Building F</u> 2 common pipistrelles in under southern fascias. 1 soprano pipistrelle in above door on south
<i>Automated Detector Surveys</i>	<i>18/06/22 – 26/08/22 (various nights in this time period)</i>	<i>Activity was exceptionally low, with no activity recorded in any building during the surveys and very little on detectors positioned externally. The most activity recorded by any detector was 10 bat passes on 21/06/22. The remainder had no more than 3 passes on any given night.</i>

A2. Briefly list other relevant information

No relevant information. All bat access in place according to licence. The Site remain subject to the same level of disturbance as originally surveyed.

C. Surveys undertaken to inform this monitoring report

If cloud-based databases have been used to submit monitoring results duplication of information below is not required.

C.1 Field survey(s).

Include survey method, dates, timings and duration, weather conditions (wind, rain, temperature – tabulated for multiple survey visits), personnel involved (provide individual licence numbers, if held) and details of experience/competence in this type of work, and equipment used. Also include any constraints and justifications for departures from best practice.

Date	Buildings Surveyed	Dusk time	Duration	Temperature (Start - End)	Cloud Cover	Wind	Precipitation
24/07/25	Building D	21:19	21:00 – 22:50	18.0°C – 16.0°C	8/8	None	None
15/08/25	Building E & F & G	20:50	20:20 – 22:15	21.0°C – 16.0°C	0/8	None	None
16/08/25	Building H & G	25:47	20:20 – 22:15	20.0°C – 15.0°C	0/8	None	None

The surveys were carried out by Laurence Brooks, Sorchia Lewis and Janice Vincett, all licensed bat workers, each with more than 15 years of survey experience. Please note that Building G is mentioned twice due to surveyor positioning.

Surveyors used ecohmeter touch2pro detectors, with additional surveyor use of fequency division batbo detectors and automated anabat detectors to record additional information. Surveyors also used Inferay Pro2 thermal cameras on all elevaitons to assist night vision.

The surveyor positions closly replicated the original 2022 surveys and these locations were largely repeated by the same surveyors.

There were no significant constraints to survey.

C.2 Survey results

Summarise survey results and include appropriate supporting information (Eg. tables and clear, annotated, and cross-referenced maps/plans/photographs). Append the raw data.

Type of monitoring survey(s) carried out	Date/s	Result
<i>For example:</i>		
<i>Visual inspection of mitigation bat loft void</i>	<i>24/07/25</i>	<i>No evidence of bats</i>
<i>Dusk/Emergence surveys</i>	<i>24/07/25 Building D</i>	<i>No emergence</i>
	<i>15/08/25 Building E & F & G</i>	<i>2x Common pipistrelle emerged from access slates on the south of Building F</i> <i>1x common pipistrelle emerged from access on the east of Building F</i> <i>1x common pipistrelle emerged from access slate on the west of Building F</i> <i>2x soprano pipistrelle emerged from east of Building E</i>
	<i>16/08/25 Building H & G</i>	<i>No emergence</i>

C.3. Alternative submission of results

Please state if results and other monitoring data has been uploaded into other formats

Eg. cloud-based database (Eg. online Wales Great Crested Newt Monitoring Database)

Survey and Site Assessment

D Conclusions and Recommendations

D.1 Conclusions

Whilst the full range of species recorded during the monitoring survey does not completely reflect that recorded pre-works in 2022, the survey work in 2022 combines the findings of three separate surveys. With that in mind, the use of the multiple access slates by pipistrelle bats is at least at levels encountered in 2022 and likely greater.

The whiskered bat was only recorded on one occasion in 2022 and therefore it is unsurprising that this was not recorded in 2025. Nevertheless the provision remains suitable for use by the species.

The loft was not used at the time of survey. However, given the presence of only 10 brown long-eared dropping in 2022, with no recorded emergence, the species was clearly not present regularly. The provision of a suitable loft void means that the Site remains more suitable than previously and use may well come with time.

Overall, use of the Site is consistent with pre-works levels, with multiple access slates being used. The favourable conservation status of the species first recorded at the Site is considered to have been maintained.

D.3 Recommendations

With reference to the conclusions of this monitoring report, please confirm if modifications of the mitigation and/or compensation are required to encourage or facilitate species take-up and, if so, provide recommendations for what is required. Please also confirm if simply repeating the survey work will be adequate for future monitoring, or if modifications are required. If modifications are required, please advise what these should be.

No further monitoring is proposed. Use of the Site post works in 2025 is consistent with levels recorded in 2022 and likely to reflect the urban location of the Site.