

INTERNAL MEMORANDUM

To: Huw Roberts
From: Matt Davies (Ecologist)
Ext: 5278
Memo number: 1
Date of previous memo: -
Date: 09/12/2022

SUBJECT: P/22/0315 | Re-roofing of the south stables, coach house stables and coach house, to relay the slate roof, provide new ridge details, eaves boards and gutters. Insert conservation rooflights | Pandy Farm Brecon Road Merthyr Tydfil CF47 8PA

Collection of former farm buildings close to valuable habitat suitable for protected species, e.g., woodland, parkland, wooded river corridor.

Documents submitted in support of the above application:

1. Bat Report. Pandy Farm, Merthyr Tydfil. Ecology Planning. Report Ref: 1703 / 02. Date: 12/11/22
2. Proposed details sheet 01. DRAFT. Pandy Farm. Job number 179. Drawing number 3-0118. Date 26.10.22
3. Proposed elevations 01. DRAFT. Pandy Farm. Job number 179. Drawing number 3-0115. Date 26.10.22
4. Proposed elevations 02. DRAFT. Pandy Farm. Job number 179. Drawing number 3-0116. Date 26.10.22

Comments

Survey results plans

In addition to the plan in Appendix 2, plans are required showing the surveyor positions, bat activity and roost locations for each individual survey visit.

Bat droppings

Para 30 – ‘Ten medium segmented bat droppings were recorded near to the southern wall.’ [Building G]

The position of the droppings is also shown on the plan in Appendix 2.

There is no interpretation regarding these droppings within the report. The following is required:

- An assessment of what species the droppings may be characteristic of.
- Clear photographs of the droppings.
- DNA analysis of the droppings.

Para 5.9 – ‘The roost sites will likely be lost to works. Bats would be entirely excluded from internal locations within the buildings although there is no evidence for roosting within any Building.’

Para 5.9 states there is no evidence of roosting within any of the buildings. This is clearly at odds with the statement in Para 30 (see above).

Biodiversity data

Biodiversity data (BARB+) is required.

Automated/static surveys

- Weather conditions for each night of the static automated/surveys must be described.
- Where were the automated/static detectors deployed and what was their orientation?

Hibernation suitability

Para 5.2 – *‘In light of the extremely low level of activity of only three common species during the peak activity season, the likelihood of bats hibernating at the Site is reduced.’*

[NB – there are only two known records in Merthyr Tydfil County Borough for whiskered bat. So in a local context, within the records, whiskered bat is not common.]

The buildings have at least moderate suitability for hibernating bats and a hibernation survey has not been undertaken.

Para 5.15 – *‘There are no timing constraints to works with regards to bats.’*

This would only be acceptable if a hibernation survey had ruled out hibernating bats.

Therefore, either a hibernation survey must be undertaken to rule hibernating bats in or out, or the works must be undertaken outside of the hibernation season.

Compensation for lost hibernation opportunities must be provided.

NRW consultation

As there are at least 3 species (possibly 4) species of bat roosting on site. Natural Resources Wales (NRW) must be consulted.

Lighting

Para 5.11 – *‘There is no proposed change of use and the Site is likely to be used as existing. No new lighting is proposed.’*

Where is the existing lighting? When is it in use? Would it impact the proposed roosting bat provision post-works?

Any onsite lighting would need to conform to the following guidelines (for example in terms of colour temperature):

<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

New bat roost access points must not be illuminated and there must be dark routes allowing access to the access points.

Enhancement

Section 6 of the Environment (Wales) Act states that biodiversity must be maintained and enhanced.

There are compensation measures for bat roosting and bird nesting opportunities to be lost as a result of the development, but how will the site be enhanced?

Breathable Roofing Membrane (BRM)

It is proposed that BRM will be used to line the roof. It must be demonstrated 'without doubt' that bats would have no access to the BRM. Both via the access tiles, but also the fascia boards, as discussed in the report – see below:

Para 5.26 – *'It is assumed that a breathable roofing membrane will be used. In this event, a small square (1m x 1m) of bitumen 1F felt will be used directly below the access tile and this will be battened around to prevent bat access to the roofing membrane across the main roof.'*

Para 5.27 – *'Access behind barge/fascia boards will have minimum dimensions of 20mm depth x 50mm width. It is assumed that bats will have no access to the main roof. If this cannot be guaranteed during construction, then a 1m strip of 1F bitumen felt will be used beneath the lower courses of tiles on all elevations where bat access is provided.'*

If this cannot be guaranteed then must will be lined with BS747 Type 1F bitumen roofing felt ONLY throughout, with no breathable membrane used.

NB Where treatment of existing timbers is required in-situ, only products suitable for use around bats will be used, as specified by Natural England and DEFRA at <https://www.gov.uk/guidance/bat-roosts-use-of-chemical-pest-control-products-and-timber-treatments-in-or-near-them>. A copy of the approved list will be issued to all contractors. New timbers will be pre-treated prior to installation.

Birds

CADW will need to be consulted regarding whether bird boxes would be allowed on the building. If not, an alternative will need to be proposed.

Are the buildings 5m high – to accommodate the swift boxes?

Para 5.4 – *'Common species of bird nest within the Buildings. There are no species of particular conservation significance.'*

Para 3.10 - *'Nesting behaviour by gull, pigeon and sparrow was recorded in Buildings E, F, and H, although it is possible that birds nest within all buildings.'*

NB house sparrow is a Section 7 species of principle importance (Environment (Wales) Act 2016). It is also on the Wales Amber List (BoCCW3 – 2016) and the UK Red List (BoCC 5 - 2021)