

Little Wing Ecology
24 Alma Street
Brynmawr
NP23 4DY

23.06.2025

Mr Chris Wreford
Former Salvation Army Building
Perrott Street
Treharris
Merthyr Tydfil
CF46 5P



Outline Method Statement: Former Salvation Army Building, Perrott Street, Treharris, CF46 5P

Good morning, Mr Wreford,

This letter outlines the proposed method statement for a bat licence application concerning the Former Salvation Army Building, Perrott Street, Treharris, CF46 5P. This document details the necessary mitigation, compensation, and enhancement measures to be undertaken during the proposed development to ensure compliance with bat legislation and to support the ecological integrity of the site.

The Former Salvation Army Building supports a day roost for common pipistrelle (No2) and soprano pipistrelle (No1). Bats and their breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2019. Where these species are present and a development proposal is likely to contravene the legal protection, they are afforded, the development may only proceed under licence issued by NRW, having satisfied the three requirements set out in the legislation. A licence may only be authorised if:

- The development works to be authorised are for the purpose of preserving public health or safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment;
- There is no satisfactory alternative; and,
- The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

Subject to planning consent being granted by the local planning authority, an EPS licence will be required to facilitate the proposals. The EPS licence is issued under Regulation 55 of the Habitats Regulations by NRW. Once the planning application has been approved, the applicant must appoint a suitably qualified ecologist, known as the Ecological Clerk of Works (ECW), to prepare;

- European Protected Species Licence - Application form
- European Protected Species Licence - Method Statement
- The application form and method statement are prepared to detail how the requirements of the Habitats Regulations will be met for managing the effects on bats during the renovation works. In addition, the applicant is also required to collate and pass on to the appointed ecologist the following documents:
- A copy of the 'Local Planning Authority Decision Notice.'
- A copy of either the Delegated Decision report or committee meeting minutes (whichever format was used to approve the planning application).
- Local Planning Authority Consultation Form.

- Architects' drawings containing the location of the bat mitigation measures (detailed below), any proposed external lighting and any proposed changes to the landscaping around the development.

Once the planning application has been approved, it is advised that the ecologist is engaged as early as possible as there can be a waiting time of approximately 40 working days / 8 calendar weeks for NRW to process the application, in addition to the time it takes to prepare and collate the documents. NRW now charge for issuing an EPS licence, but the exact charge is assessed on a case-by-case basis. It is not possible at this time to indicate what any likely charge might be.

Additional Survey: No further survey is recommended at this time. If works do not start within two years (i.e., June 2027) further survey may be necessary to qualify the roost status and recommended adaptations (if required) to the mitigation measure detailed below.

Timing of Works: The day roosts identified at the structure are considered to be of low conservation significance (Mitchell-Jones 2004) with breeding bats, not a concern. The main concern is absolute harm to the bats themselves, which will be mitigated by the presence of a licenced Ecological Clerk of Works (ECW) and the provision of temporary roosting opportunities. As pipistrelle species are known to hibernate in buildings, a precautionary approach will be followed with reference to the wall plate, lintels, window frames and any exposed cavities for any works conducted during the winter months (October to April inclusive). Work will either be avoided during the winter months (October to April inclusive) or will be conducted in line with a method statement under direct supervision by a suitable experienced and licenced person. All works must be undertaken during daylight hours with no use of artificial light at night.

Order of Works: Appropriate works for the development at the building will include:

- The provision of a temporary roosting location prior to works commencing.
- The capture/exclusion of bats at the start of works.
- The modification/replacement of existing roosts.
- The creation of a new roost.
- Provision of appropriate external lighting.

Capture/Exclusion of Bats & the Start of Work: An Ecological Clerk of Works (ECW) will need to be appointed to advise the best location for the new bat roosts, the temporary bat boxes and features of mitigation. The ECW will also provide a toolbox talk to the building contractor on the specific requirements relating to bats and will remain on-site during specific works such as the erection of scaffolding, if applicable, and stripping of bat roost features. They will also be on-site when the roosts are to be modified, creation of new roosting features and prior to the strike of scaffolding, to inspect the placement and suitability of new roosting features. Once scaffolding has been erected or a cherry-picker/telehandler is on-site, the ECW will attend the site to apply exclusion devices (if required) to the known roosting locations, in the form of a one-way gate using acetate sheets, bubble wrap or other effective material. Works may commence the day after, following a toolbox talk given to all site workers by the ECW about bats and bat behaviour. Due to the complexity of the site and numerous roosting locations available the ECW will need to be present during removal of materials from significant areas of the building including roofing materials at the eaves. At the same time that the exclusion devices are affixed, two Beaumaris Bat boxes¹, or similar artificial roost(s) should be installed on the southern elevation, near the south-eastern corner of the building, providing access to the adjacent woodland. This to be provided within the curtilage of the owners' property, with the purpose of providing roosting habitat for species such as pipistrelle. In general, bats seek warm places, and for this reason

¹ https://www.wildcare.co.uk/beaumaris-bat-box.html?gad_source=1&gclid=CjwKCAjw65-zBhBkEiwAjrqRMLWbfTavFlgGTv2ry0OGQEWngN0eVseleG460NUffHmj6NAF2TcGZhoCsKEQAvD_BwE

boxes should be located where they will receive full/partial sun, although installing features in a variety of orientations will provide a range of climatic conditions. Position boxes at least 3m (ideally 6m) above ground to prevent disturbance from people and/or predators. The most suitable location is at the southern elevation, directly below the eaves. Provided the boxes will remain unaffected by artificial light, they may be erected on part of the structure that is to remain unaffected by works (including scaffolding), i.e., the boxes will not need to be removed to complete the works and then re-attached. The ECW will advise on the suitable locations for the boxes, which may include the installation of a free-standing pole, such as those used with, 'Rocket Bat Boxes'² (The Nestbox Company). Works may start with the stripping of the barge boards and roofing materials, to expose the roosts and to discourage further roosting activity by bats. The activity must be undertaken with a sympathetic approach where all roof coverings, barge boards will be removed carefully, by hand, i.e., lifting vertically to prevent scraping. When all roosting features have been removed, works may proceed without supervision by the ECW. In the unlikely event that a bat is discovered during a time when the ECW is not present on-site, all works must cease, and the ECW contacted for advice before proceeding.

The Modification / Replacement of Existing Roosts: As day roosts for common pipistrelles and soprano pipistrelle will be destroyed during works, provision must be made to the altered structure to provide suitable features post-development. This will include the retention of the two temporary roosting boxes details above and their maintenance in perpetuity.

The Creation of a New Roost: To encourage bat roosting activity and increase roosting opportunities on-site post-development, it is recommended that a new roosting opportunity is provided as part of the development. One new roosting locations will be positioned to allow bats to moderate temperature variations in the summer months. One additional Beaumaris Bat boxes³, or similar artificial roost(s) should be installed on the north-eastern corner of the structure near the identified roost entrance. These features will be fixed to exterior of the structure, below the eaves.

Kindest regards,

Nic Aldridge

N.S.Aldridge MSc., BSc., (Hons)
Director / Ecologist
little wing ECOLOGY

² <https://www.nestbox.co.uk/products/eco-rocket-bat-box>

³ https://www.wildcare.co.uk/beaumaris-bat-box.html?gad_source=1&gclid=CjwKCAjw65-zBhBkEiwAjrQRLWbftavFlgGTV2ry0OGQEWNgN0eVseleG460NUffHmj6NAF2TcGZhoCsKEQAvD_BwE