



**SITE NAME:148 HIGH STREET,
MERTHYR TYDFIL**

BAT ACTIVITY SURVEYS

DATE: OCTOBER 2025

ISSUE 1VC

148 High Street, Merthyr Tydfil

Bat Survey Report

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EXECUTIVE SUMMARY

It is proposed to extend 148 High Street, Merthyr Tydfil.

An initial bat inspection survey was undertaken by Thomas Ecology & Arb Ltd in November 2024 in order to inform a planning application. The results indicated that the building is a confirmed roost and as such further surveys were recommended.

Subsequent emergence surveys by BE Ecological Ltd revealed that the building is likely a roost for single common pipistrelle bats.

No evidence of breeding birds was found on the exterior nor interior of the building.

This report will be valid for a period of 24 months.

1 INTRODUCTION

1.1 Background

BE ECOLOGICAL LTD was commissioned by the client to undertake subsequent activity surveys of the property in support of a planning application to extend the property.

This report includes the findings of the aforementioned bat activity surveys undertaken in the appropriate season.

The surveys were undertaken in line with the current guidance on standards for bat surveys (Bat Conservation Trust, 2023[1]).

1.2 Site description

Please see Thomas Ecology & Arb Ltd 2024.

1.3 Proposed development

It is proposed to extend the property



2 LEGISLATION & POLICIES

2.1 Conservation of Habitats & Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) provides safeguards for European Protected Species (those listed under Annex IV Habitats Directive). With regards to bats, this makes it an offence to:

- Deliberately (or recklessly in Scotland) capture, injure or kill a bat
- Deliberately (or recklessly in Scotland) disturb a bat in a way that would (significantly in Scotland) affect its ability to survive, breed or rear young (or hibernate or migrate in England, Wales and Northern Ireland) or (significantly in England, Wales and Scotland) affect the local distribution or abundance of the species.
- Damage or destroy a roost (this is an 'absolute' offence)
- Possess, control, transport, sell, exchange or offer for sale/exchange any live or dead bat or any part of a bat

2.2 Wildlife & Countryside Act 1981

The Wildlife & Countryside Act 1981 (as amended) is the legislation for England and Wales for nature conservation, making it an offence to:

- Intentionally or recklessly disturb a bat at a roost
- Intentionally or recklessly obstruct access to a roost

2.3 PLANNING POLICY WALES (EDITION 12, FEBRUARY 2024)

The following sections are relevant

6.2.8 The role of development as part of a spatial approach will be two fold. Planning authorities firstly must ensure that development avoids and then minimises impact on biodiversity and ecosystems and secondly that it provides opportunities for enhancement within areas identified as important for the ability of species to adapt and/or to move to more suitable habitats.

6.2.9 Planning authorities must encourage the appropriate management of features of the landscape which are of major importance for wild flora and fauna and other statutory and non-statutory designated sites. The features concerned are those which, because of their linear and continuous structure or their function as 'stepping stones' or 'wildlife corridors', are essential for migration, dispersal or genetic exchange. The protection and creation of networks of statutory and non-statutory sites and of the landscape features which provide links from one habitat to another can make an important contribution to developing resilient ecological networks and securing a net benefit for biodiversity and in doing so improve the quality of the local place and its ability to adapt to climate change.

6.2.12 A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal.

6.4.3 Recognising that development needs to take place and some biodiversity may be impacted, the planning system should ensure that overall there is a net benefit for biodiversity and ecosystem resilience, resulting in enhanced well-being. Addressing the consequences of climate change should be a central part of any measures to protect, maintain and enhance biodiversity and the resilience of ecosystems. secure the maintenance and enhancement of ecosystem resilience and resilient ecological networks by improving diversity, extent, condition, and connectivity.

6.4.4 It is important that biodiversity and ecosystem resilience considerations are taken into account at an early stage in both development plan preparation and when proposing or considering development proposals. Where adverse effects on biodiversity and ecosystem resilience cannot be avoided, minimised or mitigated/restored, and as a last resort compensated for, it will be necessary to refuse planning permission.

6.4.5 Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species (not including non native invasive species), locally or nationally and must work alongside nature and it must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems.....

6.4.11 Planning authorities must follow a step- wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for.....

6.4.12 Having worked iteratively, in line with Figure 12, through the stages of the step-wise approach below, and providing evidence in the Green Infrastructure Statement that the step-wise approach has been followed, a scheme of enhancements must be provided to ensure a net benefit for biodiversity. Where biodiversity enhancement proportionate to the scale and nature of the development is not proposed as part of an application, significant weight will be

given to its absence, and unless other significant material considerations indicate otherwise, it will be necessary to refuse permission.....

6.4.15 (2). When all locational, siting and design options for avoiding damage to biodiversity have been exhausted, applicants, in discussion with planning authorities, must seek to minimise the initial impact on biodiversity and ecosystems.....

6.4.15 (5). Each stage of the step-wise approach must be accompanied by a long term management plan of agreed and appropriate avoidance, minimisation, mitigation/restoration and compensation measures alongside the agreed enhancement measures. The management plan should set out the immediate and on-going management of the site, future monitoring arrangements for all secured measures and it should clearly identify the funding mechanisms in place to meet the management plan objectives. The management plan must set out how a net benefit for biodiversity will be achieved within as short a time as possible and be locally responsive and relevant to local circumstances.

6.4.15 (6) Finally, where the adverse effect on biodiversity and ecosystem resilience clearly outweighs other material considerations, the development should be refused.

6.4.16 Potential applicants should not conduct any pre-emptive site clearance works before submitting a planning application as this can make it more difficult for a development proposal to secure a net benefit for biodiversity. Where a site has been cleared prior to development its biodiversity value should be deemed to have been as it was before any site investigations or clearance took place. A net benefit for biodiversity must be achieved from that point.

6.4.31 Although non-statutory designations do not have a statutory process for their protection, Sites of Importance for Nature Conservation, Local Wildlife Sites, Local Nature Reserves, and Regionally Importance Geodiversity Sites make a vital contribution to delivering an ecological network for biodiversity and resilient ecosystems, and they should be given protection in development plans and the development management process. Non-statutory sites can form the core of a vital network of threatened habitats, play an essential role in protecting, maintaining, connecting and restoring biodiversity and contribute to nature recovery and a net benefit for biodiversity. Before authorising development likely to damage a local wildlife designation, planning authorities should give notice of the proposed operation to the local authority Ecologist and third sector environmental organisations. In all cases a written opinion must be secured from the local authority Ecologist.....

6.4.35 The presence of a species protected under European or UK legislation, or under Section 7 of the Environment (Wales) Act 2016 is a material consideration when a planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat and to ensure that the range and population of the species is sustained.

6.4.42 Permanent removal of trees, woodland and hedgerows will only be permitted where it would achieve significant and clearly defined public benefits. Where individual or groups of trees

and hedgerows are removed as part of a proposed scheme, planning authorities must first follow the step-wise approach as set out in paragraph 6.4.15. Where loss is unavoidable developers will be required to provide compensatory planting (which is proportionate to the proposed loss as identified through an assessment of green infrastructure value including biodiversity, landscape value and carbon capture). Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost.....

6.4.43 Ancient woodland, semi-natural woodlands, individual ancient, veteran and heritage trees and ancient hedgerows are irreplaceable natural resources, and have significant landscape, biodiversity and cultural value. Such trees, woodlands and hedgerows are to be afforded protection from development which would result in their loss or deterioration unless very exceptionally there are significant and clearly defined public benefits; this protection must prevent potentially damaging operations and their unnecessary loss.....

6.8.1 There is a need to balance the provision of lighting to enhance safety and security to help in the prevention of crime and to allow activities like sport and recreation to take place with the need to:

- protect the natural and historic environment including wildlife and features of the natural environment such as tranquillity;

2.4 BUILDING WITH NATURE

Applicants should consider standards for development design “Building with Nature” which can be found at www.Buildingwithnature.org.uk

2.5 PLANNING POLICY WALES SEPTEMBER 2009 (TECHNICAL ADVICE NOTE 5: NATURE CONSERVATION AND PLANNING)

Section 6.2.1 – the presence of a protected species is a material consideration when a local planning authority is considering a development proposal, that, if carried out, would be likely to result in disturbance or harm to the species or its habitat.

Section 6.2.2 – It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted.

2.6 ENVIRONMENT (WALES) ACT 2016 - THE BIODIVERSITY AND RESILIENCE OF ECOSYSTEMS DUTY

The Environment (Wales) Act became law on 21st March 2016 and replaces the Natural Environment and Rural Communities Act 2006. It puts in place legislation to enable Wales' resources to be managed in a more proactive, sustainable and joined up manner and to form part of the legislative framework necessary to tackle climate change. The Act supports the Welsh Governments wider remit under the Well-Being of Future Generations (Wales) Act 2015 so that Wales may benefit from a prosperous economy, a healthy and resilient environment and vibrant, cohesive communities. Caerphilly County Borough Council as a public body has obligations under section 6 of the Environment (Wales) Act 2016 to demonstrate how the Local Authority will "seek to maintain and enhance biodiversity in the proper exercise of their functions and in doing so promote the resilience of ecosystems".

The intention is to ensure that in carrying out their functions, public authorities will:

- Place biodiversity as a natural and integral part of policy and decision making within public bodies, embedding it in its plans, policies and projects and day-to-day activities
- Address biodiversity decline through positive actions that will result in maintenance or enhancement of our biodiversity
- Develop ecosystem resilience through maintaining and enhancing biodiversity

The reporting associated with the Section 6 duty will report against the 6 NRAP objectives (see section on Nature Recovery Plan, below)

A resilient ecosystem is one that is healthy and functions in a way that is able to address the pressures and demands that are placed on it, and is able to meet current social, economic and environmental needs whilst being able to also provide the same benefits for future generation. A resilient ecosystem is the cornerstone of the "Resilient Wales" goal in the Well-Being of Future Generations Act.

2.7 STATE OF NATURAL RESOURCES REPORT (SONARR)

The Environment (Wales) Act 2016 [EWA] requires Natural Resources Wales (NRW) to publish a State of Natural Resources Report¹ (SoNaRR); to provide information on the current state of our natural resources to enable Welsh Ministers to set priorities for action at the national level. The Authority is required to have regard to the findings of this report in exercising its functions.

The SoNaRR report, finalised in September 2016 recommends a proactive approach to building resilience and for the first time links the resilience of Welsh natural resources to the well-being of the people of Wales. This Report will underpin Natural Resources Policy.

The economic and social benefits that a fully functioning environment can provide to human society include agricultural production, forestry, building materials, tourism and leisure, energy generation, flood prevention, pollination services for crops, clean water, clean air and healthy soils. The SoNaRR report spells out the major threats to the proper functioning of ecosystems in Wales, which include:

- Climate change
- Land use change
- Over exploitation of natural resources; and
- Nutrient enrichment and pollution

2.8 NATURE RECOVERY PLAN

The Welsh Government launched the Nature Recovery Plan² (NRP) which sets out its commitment to biodiversity in Wales and how Wales will address the Convention on Biological Diversity's Strategic Plan for Biodiversity and the associated Aichi biodiversity targets in Wales. The Nature Recovery Action Plan links to and complements The Well-being of Future Generations (Wales) Act 2015 and the Environment Act (Wales) 2016.

The NRP highlights the issues that we need to address and the objectives for action to show how, in Wales we can address the underlying causes of biodiversity loss. Specifically through:

- Putting nature at the heart of decision making
- Increasing the resilience of our natural environment
- Taking specific action for habitats and species

The Nature Recovery Plan consists of three parts:

Part 1: Sets out the position with regard to biodiversity in Wales

Part 2: actions identified to support biodiversity, (The Nature Recovery Action Plan (NRAP))

Part 3: Under development: The Nature Recovery Framework

1.<https://naturalresources.wales/evidence-and-data/research-and-reports/the-state-of-natural-resources-report-assessment-of-the-sustainable-management-of-natural-resources/?lang=en>

3 METHODOLOGY

3.1 Survey Objectives

- To carry out an initial bat inspection survey along with the recommended activity surveys
- To present the above details and if necessary recommendations for mitigation, future research and compensation within this report.
- To carry out a scoping survey for breeding birds

3.2 Survey Summary

- The bat survey comprised of four parts:
- Part 1- A single activity survey
- Part 2- A single activity survey
- Part 3- A single activity survey
- Part 4- Static bat detector deployment

3.3 Surveyor Information

The survey was run by Beth Evans. Beth is the owner of BE ECOLOGICAL LTD and has a postgraduate degree in Environmental Biology: Conservation & Resource Management, specialising in British bats. Beth has six years' experience of ecological surveys, both in a small scale and large multi-disciplinary context. Beth also holds Natural Resources Wales and Natural England bat licences to disturb and handle bats.

Beth Evans was assisted during the activity surveys by Michael Rodgers, Dion Rowles and Lee Carter.

3.4 Internal & External Inspection

Please see Thomas Ecology & Arb Ltd 2024. In summary, a small scattering of bat droppings were found within the void. The droppings appeared to be from a pipistrelle species

An update check when deploying statics was made by BE Ecological Ltd who can also confirm the droppings are indicative of a pipistrelle. There do not appear to be any fresh droppings at the site and the droppings are likely to be at least a year old and not from the 2025 bat season.

3.5 Activity Surveys (emergence/re-entry surveys)

Building 'emergence' and 're-entry' surveys were carried out on the following dates, times and weather conditions. Climatic conditions including rain, wind, temperature and cloud cover were recorded for each survey using a hand held Kestrel 4500 weather station.

3.5.1 Survey 1- 17th June 2025

A dusk survey was carried out on 17th June 2025 using surveyors, positioned in such a way that as much of the building was visible to surveyors and cameras as possible. Surveyors and cameras were equipped with Batlogger M detectors.

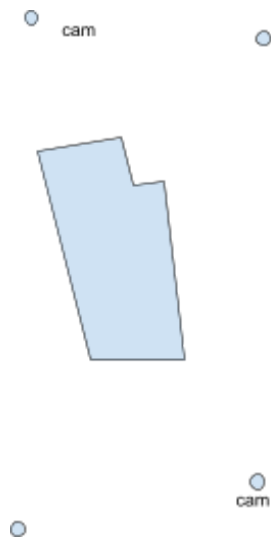


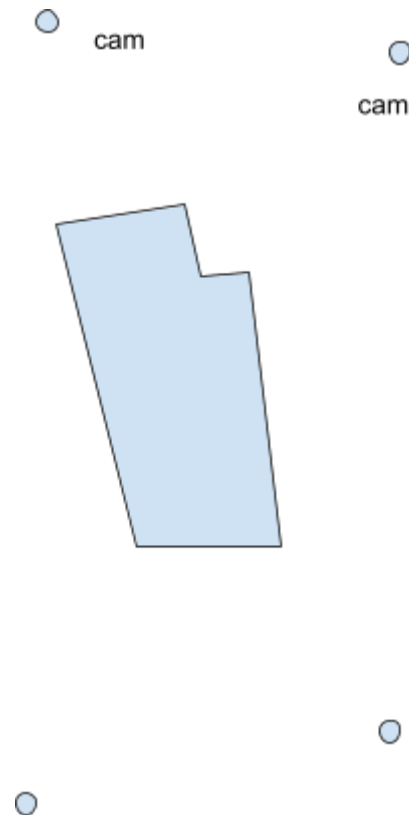
Figure1:Approximate surveyor/camera locations

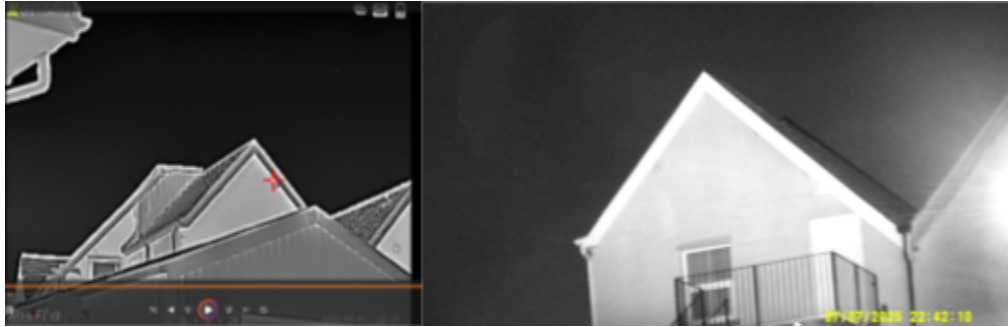


Thermal camera view

3.5.2 Survey 2- 7th July 2025

A dusk survey was carried out on 7th July 2025 using surveyors, positioned in such a way that as much of the building was visible to surveyors as possible. Surveyors and cameras were equipped with Batlogger M detectors.

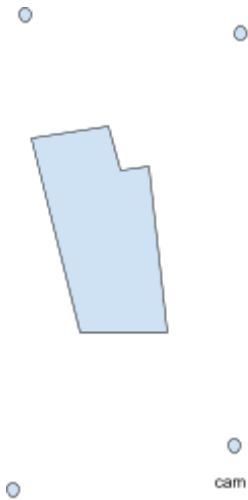




Thermal camera view

3.5.3 Survey 3- 18th August 2025

A dusk survey was carried out on 18th August 2025 using surveyors, positioned in such a way that as much of the building was visible to surveyors as possible. Surveyors and cameras were equipped with Batlogger M detectors.





Thermal camera view

3.6 Survey limitations

Any survey for bat species can only be a series of snapshots in time. Bats are highly mobile, long lived creatures (capable of living up to 30 years, sometimes longer) with complex social structures and utilising multiple roost sites within a year. The implications of this are that surveys and surveyors have to make informed assumptions based on observations, recorded data, local information and a detailed knowledge of the species.

Cameras were only used in some locations on some occasions. BE Ecological Ltd has had quite a few issues this season with anti-social behaviour in Merthyr Tydfil town centre, with one surveyor being hit with a glass bottle. Cameras were only used where positions were quiet, the decision whether to use a camera at a position was made on the day of the survey. If groups of people were present, cameras were not used not to attract unwanted attention and so that surveyors could leave quickly if they needed to. This is not seen to be an issue due to how light the town is and due to the fact that any bats were easily seen.

4 RESULTS

4.1 Inspection survey

4.1.1 External survey results

Please see Thomas Ecology & Arb Ltd, 2024

4.1.2 Internal survey results

Please see Thomas Ecology & Arb Ltd, 2024

5.0 Activity surveys

The surveys were undertaken as per the table below:

5.1 Survey Schedule and Weather Conditions

Table 1: Schedule and weather conditions

Visit	Date (sunrise) (sunset)	Start End	Time	Temp C	Wind	Cloud Cover	Notes
Survey 1 17/06/25	21:34	Start End	21:15 23:05	16 16	Low Low	30% 15%	Dry evening, insects flying
Survey 2 07/07/25	21:31	Start End	21:10 23:00	18 16	Low Low/moderate	100% 100%	Dry evening, insects flying
Survey 3 18/08/25	20:29	Start End	20:00 22:00	15 14	Low Low	40% 30%	Dry evening, insects flying

5.2 Activity Survey Results

5.2.1 Survey 1- 17th June 2025

The first bat heard was a common pipistrelle approximately 15 minutes post sunrise. The bat was seen foraging and commuting high overhead from north to south before commuting east.

Throughout the survey, activity was very low with only two bats heard and seen at the rear of the property.

No bats emerged from or interacted with the building on this date.

5.2.2 Survey 2- 7th July 2025

The first bat heard was a common pipistrelle approximately 15 minutes post sunrise. The bat was seen commuting from north to south

Common and soprano pipistrelle activity was again intermittent with bats commuting occasionally around the rear of the site.

No bats were heard and seen at the front of the property. No bats emerged from the property on this date.

5.2.2 Survey 3- 18th August 2025

Again, the first bat heard was a common pipistrelle approximately 15 minutes post sunrise. The bat was seen commuting from east to west at the rear of the property.

At 20:38, a common pipistrelle was seen emerging from the middle of the pitched roof (arrowed red below). The exact location of the roost was not able to be seen from the ground, however, surveyors did not see the bat on the opposite side of the property, confirming emergence. The bat commuted east.

Activity was generally low for the remainder of the survey and no further bats were seen emerging.



Approximate location of bat roost arrowed red

Static Bat Detector

A static bat detector (Batlogger S2) was placed within the roof void (middle section where scattering of droppings were present between the 15th and 26th July 2025).

No bat calls were recorded on the detector on any of the survey nights.

5.3 Identified Roosts

5.3.1 Survey 1

The property was not identified as a roost on this date.

5.3.2 Survey 2

The property was not identified as a roost on this date.

5.3.2 Survey 3

The property was identified as a roost for a single common pipistrelle bat.

6.0 Conclusion

The property has been identified as a roost for a single common pipistrelle bat.

Having reviewed the plans, it is likely that the bat roost will be subject to disturbance only.

Species heard on site were common and soprano pipistrelle only. No bats were identified on the static bat detector. It is likely that the bats occasionally use the building and were not in the building at the time the static was placed.

A licence from Natural Resources Wales will be required prior to works commencing.

7.0 Breeding Birds

No breeding birds were identified within the site.

8.0 INTERPRETATION & IMPACT ASSESSMENT

8.1 Active season usage

It is considered that the property is a roost for a single common pipistrelle bat.

8.2 Hibernation season usage

Common pipistrelle bats, for example, are known to hibernate within buildings. In the absence of any definite data to the contrary, it should be assumed that hibernating bats are present and the hibernation season should be avoided for any works that could impact bats during this time.

8.3 Breeding birds

No evidence of breeding birds was found on the exterior or interior of the property. If at any point a birds nest is identified, it will be left until such a time that the young have fledged the nest of their own accord.

8.4 Ecological Impacts of development

The impacts of the development have been assessed using the current information of the proposed works. Should any changes be made to the proposed works, the assessment will need to be reviewed and amended as necessary.

It is considered that the roosts will be subject to disturbance only as a result of the proposed extension.

9.0 MITIGATION/COMPENSATION/ENHANCEMENT

9.1 Bats

The bat roost will not be lost as a result of the proposed extension.

The loft space is proposed to be extended and this new area of loft space should be made available to bats by providing access under the bargeboards and over the wall top. The new area of loft should be separated from the old loft space (to prevent bats access the area with breathable roofing membrane). The new loft area will be lined either with traditional type 1F bitumen felt or Non- Bitumen Coated Roofing Membranes (NBCRMs) that have passed the independent snagging propensity tests evidenced, such as TLX bat safe.

As a biodiversity enhancement/mitigation feature, two of the following bat boxes will be built into the new extension <https://www.nhbs.com/ib-vl-05-vivara-pro-build-in-woodstone-batbox>.

9.2 Birds

Swift boxes will be installed within the development as per the proposed plans

10.0 RECOMMENDATIONS

10.1 Timing

Common pipistrelle bats, for example, are known to hibernate within buildings. In the absence of any definite data to the contrary, it should be assumed that hibernating bats are present and the hibernation season should be avoided for any works that could impact bats during this time.

10.2 Timber/roofing materials

Bat roosts should be lined either with traditional type 1F bitumen felt or Non- Bitumen Coated Roofing Membranes (NBCRMs) that have passed the independent snagging propensity tests evidenced, such as TLX bat safe.

10.3 Lighting

Newly created access points and bat boxes will not be directly illuminated. All external lighting will face downwards and be set on timers to ensure that bats can use the area should they wish. – In addition to this, any onsite lighting will conform to the following guidelines:

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

Flight paths to the bat boxes and the newly created bat mitigation will be kept dark at all times. The southern boundary must remain unlit.

10.4 Bat Licensing

A European Protected Species Licence obtained from Natural Resources Wales will be required prior to works commencing.

An interim bat box should be erected in the event that a bat is found during the works and needs to be moved. This should be undertaken by a licenced bat ecologist.

10.5 Supervision

Supervision for the tying in of the extension will be required.

11.0 METHOD STATEMENT (ONCE A LICENCE HAS BEEN OBTAINED)

1. A suitably licenced and experienced ecologist will be on site/call for the duration of the Works.
2. Before any work begins on site, a briefing for contractors and other site-staff 'toolbox talk' will be given by an ecologist. The briefing will cover the issues in respect of protected species they may encounter on site, where they might find them, methods of working, and what they need to know to avoid committing an offence. Every briefing attendee will be provided with a copy of a Method Statement and the contact details of an ecologist and Natural Resources Wales.
3. Before any work commences, the building will be checked by the ecologist for the presence of bats and birds
4. Temporary mitigation (a bat box) will be erected on the site, if a bat is encountered during the course of the works, the bat will be moved to the temporary mitigation by the licensed ecologist.
5. All suitable bat roosting features will need to be removed by hand and inspected by the onsite bat ecologist.
6. Features will also need to be removed manually, one at a time, with the bed and underside inspected for bats/sign of bats by the onsite ecologist before moving onto the

next.

7. Only when the onsite bat ecologist is happy that there is no further potential for bats, may he/she leave and the works continue with no supervision. A licensed bat ecologist will be on call for the remainder of the works. In the unlikely event that bats are found during a period that the licensed bat ecologist is not present on site, all works must cease and the licenced bat ecologist engaged.

8. If more bats than the surveys identified or any number of bats of a different species are identified, all works will cease and NRW will be consulted. This may result in further survey effort or an amendment to the licence.

If at any point an active birds nest is found, all works will cease until the young have fledged the nest of their own accord.

12.0 REFERENCES

Bat Conservation Trust. (2023) *Bat Surveys - Good Practice Guidelines*. Bat Conservation Trust, London.

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