

# EAST ECOLOGY

## **DOWLAIS RUGBY FOOTBALL CLUB, BLAENDOWLAIS, DOWLAIS, MERTHYR TYDFIL**

### **BAT PRELIMINARY ROOST ASSESSMENT 2023**



Produced for Dowlais Rugby Football Club

## QUALITY ASSURANCE

| Author               | Reviewer      | Revision | Date Issued |
|----------------------|---------------|----------|-------------|
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|                      |               |          |             |

| Revision | Notes |
|----------|-------|
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## SUMMARY

The buildings known as Dowlais Rugby Football club are currently only partly in use. The detached club house building is in use while the nearby changing rooms have been disused for a short time and are in need of renovation to bring them back into use. The custodians wish to apply for planning permission to build a small connecting building between the two existing with new doorways internally and externally. Internal modifications to the changing room building are planned with new windows to the front and rear of the building, where currently there are none.

A preliminary roost assessment for bats and birds was commissioned by the club in November 2023. The survey and desk study followed best practice guidelines using appropriate equipment, under suitable weather conditions and was undertaken by an experienced and qualified bat ecologist.

The data search found no records of bats at the address, but a few roosts are known in the search area, some within the built-up area, but no sites designated for bats were found.

The evaluation of the club house building was of **negligible potential for roosting bats**, while the changing room building was found to hold **a roost of likely more than one bat**. And likely to be of **low to moderate conservation significance**.

At least two dusk emergence or dawn re-entry surveys are recommended to observe any bats emerging and confirm suspected exit/roost areas, species and type of roost, in the event that a pitched roof is needed to tie-in to the changing room roof. Surveys are less likely to be needed should a flat roofed connection be chosen where the existing roofs remain unchanged.

Mitigation will be based around minimising disturbance to bats using the northwest gable end and will need to be carried out under a Natural Resources Wales licence. There are likely to be restrictions on the timing of work to avoid disturbance including avoidance of the winter hibernation period for the doorway and window knock through as bats may be hibernating in the cavity wall. Enhancement measures will include two bat boxes and four bird boxes as well as minimal external lighting, although none is planned at present. Some native shrub planting around the northwest gable end would be appropriate, but would rely on adjoining landowner permission, presumably the county borough council.

## INTRODUCTION

**Dowlais Rugby Football Club, Bleandowlais, Dowlais, Merthyr Tydfil CF 48 3RB** lies at an approximate National Grid Reference **SO07430798**. The two buildings which are the subject of this report are two modern single storey buildings one in regular use as a club house the other an occasionally used changing rooms. The buildings are no more than 40 years old and of a modern construction.

The buildings occur in within the built-up area of Dowlais but near to the edge of the larger conurbation of Merthyr Tydfil. The immediate local area is quite open with little vegetation. The relative position of the building is shown in figure 1.

Dowlais Rugby Football Club wish to wish to obtain planning permission from Merthyr Tydfil County Borough Council to join the two adjacent detached buildings internally and re-organise some of the internal space with some refurbishments. The work would involve building new block walls to fill in the gap between the two buildings, opening up internal doorways between the existing buildings, new windows and one new external doorway. The proposals include a pitched roof over the new adjoining part and tying into the adjacent gable end and creating a new hip to the other. The proposals are illustrated in figure 2. Alternative plans for a flat roof are also being considered.

The author of this report, Rebecca of East Ecology has twenty years post graduate experience in ecological consultancy and nature conservation and holds Natural Resources Wales survey licences for protected species including bats. Rebecca is also a full member of the Chartered Institute of Ecology and Environmental Management and a Chartered Environmentalist.

## **LEGISLATION AND POLICY**

### **Conservation of Species and Habitats Regulations (Amendment) Regulations 2017**

All bats found in the UK are High Level Protected Species (HLPS) being protected under the Conservation of Habitats and Species Regulations 2017, known as the 'Habitats Regulations'.

Under the Habitats Regulations, it is an offence to:

- Deliberately capture, injure or kill any wild animal of an HLPS,
- Deliberately disturb wild animals of any such species,
- Damage or destroy a breeding site or resting place of such an animal.

Disturbance is defined as that which is likely:

1. To impair the animal's ability:
  - to survive, to breed or reproduce, or to rear or nurture their young, or
  - in the case of animals of a hibernating or migratory species (e.g. bats), to hibernate or migrate; or
2. To affect significantly the local distribution or abundance of the species to which they belong.

Other offences also exist relating to possession, transport and sale.

### **Wildlife and Countryside Act 1981**

Section 9 of the Wildlife and Countryside Act 1981 (as amended) offers varying degrees of protection to species including otter, bats, dormice, amphibians and reptiles. Animals listed on Schedule 5 of the Act are protected against one or more of the following:

- intentional killing, injuring or taking (not applicable to bats, as covered by the regulations above);
- intentional or reckless damage or destruction, or obstruction of access to any structure or place which any wild animal included in Schedule 5 uses for shelter or protection;
- disturbance of any such animal while it is occupying a structure or place which it uses for that purpose;
- sell, offer or exposes for sale, or has in his possession or transports for the purpose of sale, any live or dead wild animal included in schedule 5, or any part of, or anything derived from such an animal.

## **Environment Act (Wales) 2016**

Section 7 of the Environment (Wales) Act has replaced the Section 42 of the NERC Act 2006 in Wales. Section 7 lists the living organisms and types of habitat in Wales which are considered to be of key significance to sustain and improve biodiversity in relation to Wales.

The Act states that Welsh Ministers must take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section and encourage others to take such steps.

## **Planning Policy Wales 2021**

Section 6.4 of Planning Policy Wales states that: 'A proactive approach towards facilitating the delivery of biodiversity and resilience outcomes should be taken by all those participating in the planning process. In particular, planning authorities must demonstrate that they have sought to fulfil the duties and requirements of Section 6 of the Environment Act by taking all reasonable steps to maintain and enhance biodiversity in the exercise of their functions.'

## **Well-Being of Future Generations (Wales) Act 2015**

places a duty upon public bodies to produce well-being objectives, in addition, the Act also establishes Public Service Boards for each Local Authority area in Wales, who must prepare and publish a local Well-Being Plan, setting out objectives and how the board or it's individual members will achieve them.

## **METHODOLOGY**

### **Desk Study**

A search was made for available information relating to designated sites within a 10km area for their bat interest, including Internationally and Nationally important sites; Special Areas of Conservation (SAC) and Sites of Species Scientific Interest (SSSI). The South East Wales Biodiversity Records Centre (SEWBReC) supplied the data search for bat records within a 2km radius and roof nesting birds within 150m of Dowlais Rugby Football Club. Freely available information was obtained from internet source Multi Agency Geographical Information for the Countryside (MAGIC). The data search was conducted to the latest bat survey guidelines 'Bat Surveys for Professional Ecologists: Good Practice Guidelines' (2023)'.

### **Site Survey**

#### **Potential roost assessment**

Dowlais Rugby Football Club was visited on 15<sup>th</sup> November 2023 during daylight hours by an experienced and licensed bat ecologist (licence number S089583-1).

All accessible elevations of the building were examined on the outside as well as inside. Equipment used in the searches included a high-powered torch, a telescopic ladder and a pair of close focusing binoculars.

The surveyor searched for evidence of bats:

- Sightings of live bats
- Dead bats
- Bat droppings
- Urine staining
- Grease marks
- Claw marks
- Sound or smell of bats

The surveyor asked the representative if they had any prior knowledge of bats at the property.

The surveyor also noted down features of the building which would be suitable for bat roosting, suitability of the surrounding area with respect to food sources and connectivity of the landscape were also noted according to the latest bat survey guidelines.

While every effort is made during this type of survey to identify positive signs of bat use, evidence may be absent or difficult to access even if small numbers of bats are present. An absence of evidence identified does not necessarily indicate an absence of bats as a structure may still have potential for them.

### **Constraints**

There were no constraints to the survey which would produce invalid results.

## RESULTS

### Desk Study

#### Designated Sites

No designated sites were found within the search area relating to bats, although other designated sites lay within 10km designated for their habitat or geological interest.

#### Species Records

22 records of bats and 32 records of birds were recovered from the search area, the results of the data search are summarised in tables 1 and 2. No records were found relevant to the buildings themselves and the closest relevant record was from 1627m away of a brown long eared bat roost. Records of roof nesting birds were found and reported in table 2. Many of these appear at the same distance due to the same recorder visiting a site multiple times or may be artifact of the way in which the grid references are recorded.

| Scientific name                  | Common name          | No. Records | Proximity | Status                                                                                                                  |
|----------------------------------|----------------------|-------------|-----------|-------------------------------------------------------------------------------------------------------------------------|
| <i>Chiroptera</i>                | Bats                 | 2           | 1602m     | EPS, WCA5, LBAP (ANG, DEN, FLI, RCT, SNP, TRA, TRF)                                                                     |
| <i>Myotis daubentonii</i>        | Daubenton's bat      | 2           | 1662m     | EPS, HDir, WCA5, Bern, RDB2 (UK), LBAP (ANG, CLY, CON, DEN, FLI, GWY, POW, SNP, TRA, TRF)                               |
| <i>Myotis Nattereri</i>          | Natterer's bat       | 2           | 1869m     | EPS, HDir, WCA5, Bern, RDB2 (UK), LBAP (ANG, CLY, CON, DEN, FLI, GWY, POW, SNP, TRA, TRF)                               |
| <i>Myotis</i>                    | Myotis bat species   | 1           | 1721m     | EPS, HDir, WCA5, Bern, LBAP (ANG, DEN, FLI, SNP, TRA, TRF)                                                              |
| <i>Pipistrellus pipistrellus</i> | Common pipistrelle   | 5           | 1721m     | EPS, HDir, WCA5, S7, Bern, RDB2 (UK), LBAP (ANG, BBNP, CER, CLY, CON, CRM, DEN, FLI, GWY, PEM, POW, SNP, TRA, TRF, VOG) |
| <i>Pipistrellus pygmaeus</i>     | Soprano pipistrelle  | 1           | 1880m     | EPS, HDir, WCA5, S7, Bern, RDB2 (UK), LBAP (ANG, BBNP, CLY, DEN, FLI, GWY, PEM, POW, SNP, TRA, TRF, VOG)                |
| <i>Pipistrellus sp</i>           | Pipistrelle species  | 3           | 1840m     | EPS, WCA5, LBAP (ANG, DEN, FLI, SNP, TRA, TRF)                                                                          |
| <i>Plecotus auritus</i>          | Brown long-eared bat | 3           | 1627m     | EPS, HDir, WCA5, S7, Bern, RDB2 (UK), LBAP (ANG, CLY, CON, DEN, FLI, GWY, POW, SNP, TRA, TRF, VOG)                      |
| <i>Rhinolophus hipposideros</i>  | Lesser horseshoe bat | 3           | 1662m     | EPS, HDir, WCA5, S7, Bern, RDB2 (UK), LBAP (ANG, BBNP, CLY, CON, CRM, DEN, FLI, GWY, MON, PEM, POW,                     |

|  |  |  |  |                          |
|--|--|--|--|--------------------------|
|  |  |  |  | SNP, TRA, TRF, VOG, WRE) |
|--|--|--|--|--------------------------|

**Table 1. Summary of data search results relating to bats from SEWBReC.**

| Scientific name                | Common name              | Proximity | No. Records | Status                                                                                                |
|--------------------------------|--------------------------|-----------|-------------|-------------------------------------------------------------------------------------------------------|
| <i>Apus apus</i>               | Swift                    | 519m      | 1           | LBAP (BRG, RCT, VOG), WBAm(RSPB), UKBAm(RSPB)                                                         |
| <i>Athene noctua</i>           | Little owl               | 519m      | 1           | Bern, CITES, LBAP (CLY, CON), LI(VC43)                                                                |
| <i>Cyanistes caeruleus</i>     | Blue tit                 | 166m      | 3           | Bern, LBAP (CON, POW)                                                                                 |
| <i>Delichon urbicum</i>        | House martin             | 489m      | 1           | Bern, LBAP (BRG, CON, POW, RCT, VOG), UKBAm(RSPB)                                                     |
| <i>Falco peregrinus</i>        | Peregrine                | 489m      | 1           | BDir1, WCA1.1, Bern, CITES, LBAP (ANG, CLY, CON, GWY, PEM, POW, TRF, VOG), LI(VC43)                   |
| <i>Falco tinnunculus</i>       | Kestrel                  | 519m      | 2           | S7, Bern, CITES, WBR(RSPB), LBAP (ANG, CLY, CON, DEN, FLI, GWY, PEM, POW, VOG), LI(VC43), UKBAm(RSPB) |
| <i>Hirundo rustica</i>         | Swallow                  | 489m      | 3           | Bern, LBAP (ANG, CON, GWY, POW, VOG), WBAm(RSPB)                                                      |
| <i>Larus argentatus</i>        | Herring gull             | 166m      | 4           | BDir22, S7, WBR(RSPB), LBAP (CON, GWY, POW, VOG), UKBR(RSPB)                                          |
| <i>Larus fuscus</i>            | Lesser black backed gull | 166m      | 4           | BDir22, LBAP (CON, GWY, PEM, POW, SNP), WBAm(RSPB), UKBAm(RSPB)                                       |
| <i>Motacilla alba</i>          | Pied wagtail             | 489m      | 3           | Bern, LBAP (CON, POW, TRA)                                                                            |
| <i>Parus major</i>             | Great tit                | 166m      | 3           | Bern, LBAP (CON, POW)                                                                                 |
| <i>Passer domesticus</i>       | House sparrow            | 166m      | 2           | S7, LBAP (CLY, CON, FLI, GWY, VOG), WBAm(RSPB), UKBR(RSPB)                                            |
| <i>Phoenicurus phoenicurus</i> | Redstart                 | 519m      | 2           | Bern, LBAP (CON, GWY, POW, SNP), WBAm(RSPB), UKBAm(RSPB)                                              |
| <i>Sturnus vulgaris</i>        | Starling                 | 166m      | 2           | BDir22, S7, Bern, WBR(RSPB), LBAP (BBNP, CON, FLI, GWY, VOG), UKBR(RSPB)                              |

**Table 2. Records of roof nesting birds**

UKBAP = UK Biodiversity Action Plan Priority Species, UKBAP (R) = UK Biodiversity Action Plan Priority Species (Research only species), BDir1 = EC Birds Directive Annex 1 Species, BDir21 = EC Birds Directive Annex 2.1 Species, BDir22 = EC Birds Directive Annex 2.2 Species, Bern = The Bern Convention on the Conservation of European Wildlife and Natural Habitats Bonn = The Bonn Convention on the Conservation of Migratory Species of Wild, Animals Species, CITES = Convention on International Trade in Endangered Species, EPS = European Protected Species, HDir = EU Habitats Directive Species, NRW = Natural Resources Wales Priority Species, RD1 (Wales) = Welsh Red Data Book listing based on IUCN guidelines RD1 (UK) = UK Red Data Book listing based on IUCN guidelines, RD2 (UK) = UK Red Data Book listing not based on IUCN guidelines (Nationally, Rare and Scarce), WBR (RSPB) = RSPB Welsh Red listed birds (not based on IUCN criteria), WBAm (RSPB) = RSPB Welsh Amber listed birds (not based on IUCN criteria), UKBR (RSPB) = RSPB UK Red listed birds (not based on IUCN criteria), UKBAm (RSPB) = RSPB UK Amber listed birds (not based on IUCN criteria) S7 = Environment Act (Wales), Section 7 Species, WCA1.1 = Wildlife and Countryside Act Schedule 1 Part 1 Species, WCA5 = Wildlife and Countryside Act Schedule 5 Species, WCA8 = Wildlife and Countryside Act Schedule 8 Species, WCA9 = Wildlife and Countryside Act Schedule 9 Species, INNS = Invasive Non-Native Species, WSG.P = Guidelines for the Selection of Wildlife Sites in South Wales – Primary, species, WSG.C = Guidelines for the Selection of Wildlife Sites in South Wales -Contributory species, WVP = IUCN Threat Listing of Welsh Vascular Plants, LBAP (xxx) = Local Biodiversity Action Plan Species (see key below), LI

(SEWBRc) = Locally Important Species (as identified by local specialists) in SEWBRc area, LI (BIS) = Locally Important Species (as identified by local specialists) in BIS area, LI (BRYO-MON) = Locally or nationally scarce or rare bryophyte in Monmouthshire, LI (VC##) = Locally Important Species (as identified by local specialists) in Vice County ##, LI (VC##, LS) = Locally Scarce in Vice County ##, LI (VC##, LR) = Locally Rare in Vice County ##, LI (VC##, EX) = Extinct in Vice County ##, LI (VC##, UR) = Under Recorded in Vice County ##

## **Preliminary Roost Assessment**

Dowlais Rugby Football Club was made up of two detached buildings. Both were relatively recent in their construction and both of block or brick walls with a cavity and moulded or flat concrete tile roofs. The former changing rooms were no longer in use but the clubhouse building was. The clubhouse building was extended at some point relatively soon after its construction.

### **External**

#### Changing rooms building

The changing rooms building was constructed of block with a brick outer skin and flat concrete tile roof covering. The barge boards and fascia boards were wooden with some areas of decay. There were no windows and the single entrance was covered by a shutter to a porch area. The doors to the internal space were kept closed. There appeared to have been little maintenance on this building in several years other than the addition of a plastic verge on both gable ends.

A significant gap (approx. 20mm) was noted between the fascia boards and the brick wall on both front and rear elevations, for almost their entire lengths. The gaps was thought to be too wide to provide shelter for crevice dwelling bats, but would provide access to the top of the wall plate and potentially the cavity wall.

The barge board of the southeast gable end was tight fitting to the brick wall with no significant damage to its integrity, while the barge board at the northwest gable end was mostly tight fitting, but with a small gap at the apex.

One small area of damaged roofing tile was noted on the front elevation, but the roof was otherwise sound with no other noticeable gaps.

No other external features were identified as there were no windows or missing mortar in the brickwork. Holes in the gable end wall were filled by ventilation fans preventing access by bats or birds.

#### Club house building

The club house building was of a similar construction but had an exterior of rendered and painted blockwork. The 'L' shaped building had pvc fascia and barge boards with pvc windows and doors. The building was well-maintained overall with no gaps at the windows, soffits, barge, or fascia boards. There were no gaps in the roof tiles or ridge, although one small gap was noted in the flashing at the base of the valley on the southeast elevation.

## **Internal**

### Changing rooms building

The roof structure was of a trussed timber framework with some boarding to the floor to aid access. The single loft was large being approximately 16m x 9m with a height to the ridge of 2.5 m. The roof was lined with tightly fitting ply boarding from end to end, some mineral wool insulation was on the floor of the loft with a few stored items. To the northwest end of the loft was a small tube heater which was switched on at the time of the survey assisting in keeping the loft dry and free from damp. No light ingress was noted at the eaves or at any other point inside the roof. A noticeable pile of bat droppings was found below the internal apex of the northwestern end. This was made up of at least 300 recent and fresh droppings, which had the size, texture and shape of pipistrelle bat droppings. No other droppings were found inside the loft indicating that these had fallen through from the apex. A sample was taken for later analysis should the client wish to proceed with determining the species via an external bat genotyping service.

### Club house building

The roof structure was also of a trussed timber framework also with some boarding to the floor for access. The loft had in it top up mineral wool insulation and was used for some storage. The floor of the loft had over a great deal of cables and pipework relating to the functions of the building. There was evidence of rodent activity inside the loft with chewed pipe insulation and a few larger scattered droppings. Inside the loft was the remnants of the first roof built over by the current building during its extension. The perpendicular loft was also inspected but found to be broadly the same as the adjoining loft. No bat droppings were found inside either part of the loft and only a tiny amount of light ingress was noted over the porch area.

## **Other Species**

Although crows were noted resting on the roof of the building, there was no opportunity for bird nesting in either building.

## **EVALUATION**

No sites designated for bats fell within the 10km search area, although a hibernation site lies just outside of this.

The evidence gathered from the potential roost assessment survey and the desk study suggest that the changing room building is a bat roost of low to moderate conservation significance and is likely to be host to more than one bat. The fresh and recent nature of the bat droppings found may infer a transition or even winter roost and there is a possibility that bats are present all year around. The presence of the small heater in the northwest end may have caused bats to prefer this roost location during the cooler months, prior to hibernation.

The evidence gathered suggests that bats are entering at the northwest gable end apex and remaining near to that location. However, there is opportunity for bats to enter at any point along the front and rear sides of the building.

While there was no evidence to suggest that the bats present are using any space other than the top of the wall plate or gap between the roof lining and tiles, there is access for them into the loft void area.

The club house building however offers negligible potential as a bat roost.

Neither building was thought to offer potential for bird nesting, other than crows perching on top of the roof.

## **IMPACT ASSESSMENT**

The proposals to change the interior layout of the changing room building are unlikely to have impacts on bats particularly as the main noise disturbance will occur at the opposite end of the building to the suspected location of the bat roost.

Should the plan be to build between the two buildings with a pitched roof tying into the changing room building and a hipped roof to tie into the club house building, there is a possibility of small impacts to bats. Since they are present in the northwest gable end, there is opportunity for them to move around inside the cavity wall and be present at any point within it or between the roof lining and tiles, including the affected southeast gable end. Although they are less likely to be present furthest away from their access point.

An alternative approach would be to create a flat roofed connection between the two buildings, which would therefore not affect the roof space or roof covering. There would still be a small potential impact breaking through the cavity wall of the changing room building southeast wall to create a new doorway through to the connection and the new windows on the front and rear. However, bats are less likely to be present at the opposite end of the building to their entrance point. This option offers the least disturbance to bats particularly if the doorway and windows are inserted outside of the winter period.

Dusk emergence surveys may provide more detail regarding the species and type of roost in order to interpret the scale of impact fully, however it is possible that summer surveys may miss the bat activity at the changing room building should this be an autumn transitional roost. Remote monitoring of the gable end exit point during autumn would not be possible due to the insecure nature of the land adjacent to it.

## CONCLUSIONS AND MITIGATION

No designated sites fell into the search area for bats and no records originated from the building itself. All records were at a distance of over 1000m.

The former changing room building at Dowlais Rugby Football Club was found to hold a bat roost, probably of a pipistrelle species and most likely, more than one bat. The roost may be a transitional autumn roost and there is also opportunity for bats to be present within the cavity wall during winter, or summer.

The club house building however was thought to have negligible potential for bat roosting. Neither was there any opportunity for bird nesting at the club house or the changing rooms.

Scenario A – Pitched roof addition over connecting building:

Work to connect the southeast gable end of the changing room roof to the new connection has a small potential for a disturbance impact on bats, should they be using areas of the roof other than the northwest gable end.

At least two dusk emergence or dawn re-entry surveys are recommended to identify species and type of roost. These will be conducted between May and August during appropriate weather conditions, by suitably experienced persons using equipment considered suitable for a commercial survey. The surveys are likely to detect at least some activity but may miss the autumn transitional use of the building, if that is its main roost type.

Scenario B – Flat roof over connecting building:

No changes would be needed to the existing roof of the changing room and no impacts on bats using it would be anticipated.

No surveys would be necessary but knock through work to the changing room building for doors and windows would be done between March and November outside of the winter hibernation period as a precaution.

No ecologist supervision for this activity is thought to be necessary, but if a bat is discovered during this work, all destructive work affecting the cavity wall must cease until advice and potentially a licence is sought from Natural Resources Wales.

The survey data within this report is considered by NRW as valid for up to two years. Following this point in time the site will require further survey to detect any changes in bat use of the building if the project is delayed.

## Mitigation

Scenario A - Pitched roof addition over connecting building.

With additional information from the surveys to be gathered on bats using the changing room building roof, following the latest bat survey guidelines, a detailed mitigation plan will be possible. This will be accompanied by a licence from Natural Resources Wales to disturb a bat roost. The mitigation may take the form of limited period in which the roof work may be undertaken to minimise disturbance, with ecologist supervision. There will be a requirement to make improvements for bats and other wildlife as part of the planning process. Enhancements for bats and birds would be anticipated in the form of reduced external lighting where possible, bat and bird boxes on the buildings and native shrub planting of the ground to the north of the changing room building. Shrub planting would need to take place on land outside of the club control as the land is likely to belong to the council. Relevant permissions would need to be sought for this.

Scenario B– Flat roof over connecting building.

Mitigation for any possible effects of joining the new connection to the existing changing room on bats would be to carry out the knock-through work Between March and November for new windows and doors outside of the winter period to avoid any possible disturbance to hibernating bats which may be in the cavity wall. Enhancements for bats and birds would be anticipated in the form of reduced external lighting where possible, bat and bird boxes on the buildings and native shrub planting of the ground to the north of the changing room building. Shrub planting would need to take place on land outside of the club control as the land is likely to belong to the council. Relevant permissions would need to be sought for this.

## Enhancements

A selection of durable woodstone bird boxes will be added to the exterior walls of the building. Models such as the Estella House sparrow nest box would be suitable and a minimum of two would be appropriate.

[https://www.birdfood.co.uk/woodstone-estella-house-sparrow-nest-box?gclid=CjwKCAjw44mlBhAQEiwAqP3eVk4CLLk71JtfpBR1fTrugOL-2XM5DVGiPJw5pb-K\\_aqIPwZbY-loYRoC554QAvD\\_BwE](https://www.birdfood.co.uk/woodstone-estella-house-sparrow-nest-box?gclid=CjwKCAjw44mlBhAQEiwAqP3eVk4CLLk71JtfpBR1fTrugOL-2XM5DVGiPJw5pb-K_aqIPwZbY-loYRoC554QAvD_BwE)

Addition of boxes for starlings such as the woodstone startling nest box, again a minimum of two would be appropriate. Proposed locations are shown in figure 3.

[https://www.birdfood.co.uk/woodstone-starling-nest-box?gclid=CjwKCAjw44mlBhAQEiwAqP3eVrFQF0aKzQoYlim5ys3\\_6pFXDVsJAtSYndUiTe9hrCuABZQ732dYxRoCmHcQAvD\\_BwE](https://www.birdfood.co.uk/woodstone-starling-nest-box?gclid=CjwKCAjw44mlBhAQEiwAqP3eVrFQF0aKzQoYlim5ys3_6pFXDVsJAtSYndUiTe9hrCuABZQ732dYxRoCmHcQAvD_BwE)

Addition of two bat boxes on the northwest gable either side of the existing bat entrance and as the northeast and southwest sides are too low to the ground. The Beaumaris woodstone

wall mounted box would be suitable or other durable model suitable for a small crevice dwelling species. Proposed locations are shown in figure 4.

<https://www.wildcare.co.uk/beaumaris-bat-box.html>

Although no exterior lighting is planned as part of the development, any that is subsequently installed must meet the criteria within the guidance document 08/18 Bats and Artificial Lighting in the UK produced by the ILP and Bat Conservation Trust.  
<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

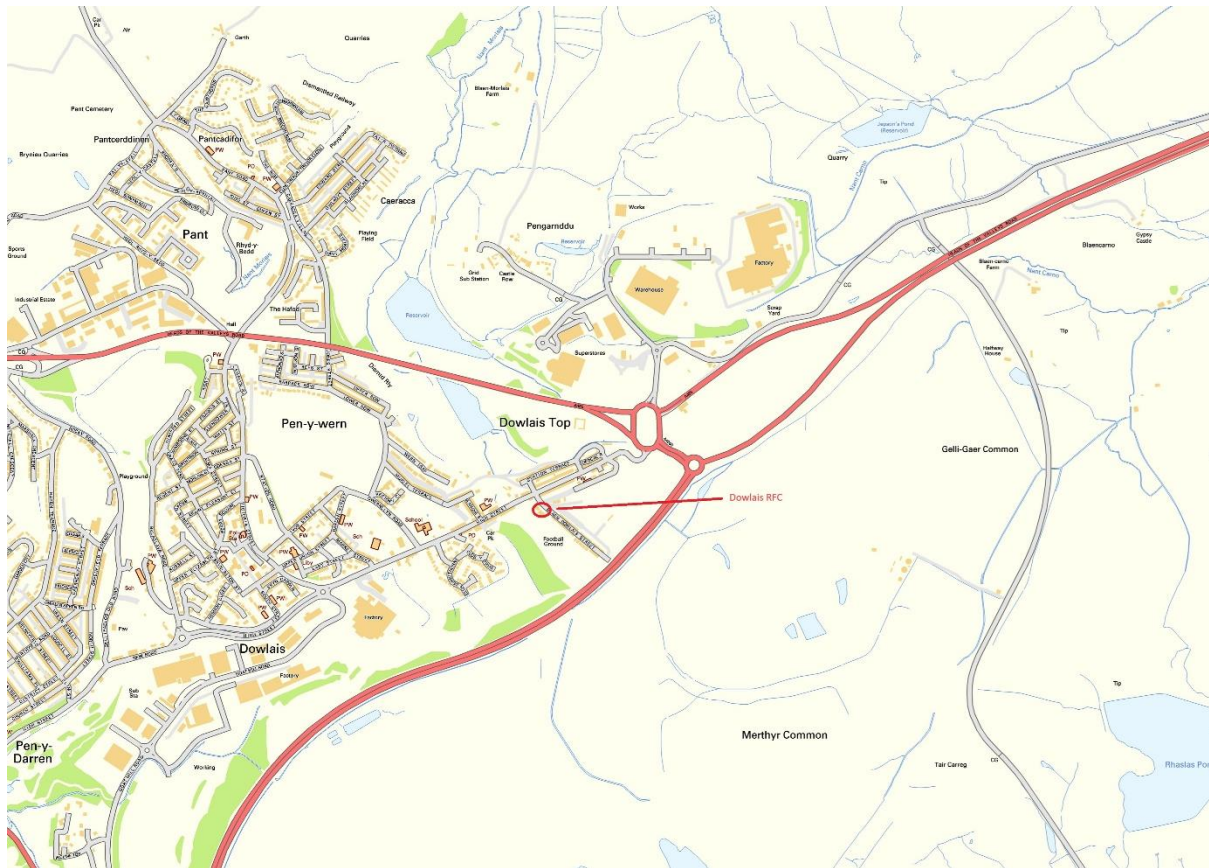
Should permission to plant native shrubs on the land adjacent to the northwestern end of the changing room building be available the following species would be appropriate:

|                   |                              |
|-------------------|------------------------------|
| Field maple       | <i>Acer campestre</i>        |
| Wild clematis     | <i>Clematis vitalba</i>      |
| Dog wood          | <i>Cornus sanguinea</i>      |
| Hazel             | <i>Corylus avellana</i>      |
| Common hawthorn   | <i>Crataegus mongoyna</i>    |
| Spindle           | <i>Euonymus europaeus</i>    |
| Alder buckthorn   | <i>Frangula alnus</i>        |
| Hop               | <i>Humulus lupulus</i>       |
| Holly             | <i>Ilex aquifolium</i>       |
| Juniper           | <i>Juniperus communis</i>    |
| Wild privet       | <i>Ligustrum vulgare</i>     |
| Honeysuckle       | <i>Lonicera periclymenum</i> |
| Blackthorn        | <i>Prunus spinosa</i>        |
| Purging buckthorn | <i>Rhamnus cathartica</i>    |
| Dog rose          | <i>Rosa canina</i>           |
| Grey willow       | <i>Salix sinerea</i>         |
| Osier willow      | <i>Salix viminalis</i>       |
| Elder             | <i>Sambucus nigra</i>        |
| Wych elm          | <i>Ulmus glabra</i>          |
| Wayfaring tree    | <i>Viburnum lantana</i>      |
| Gelder rose       | <i>Viburnum opulus</i>       |

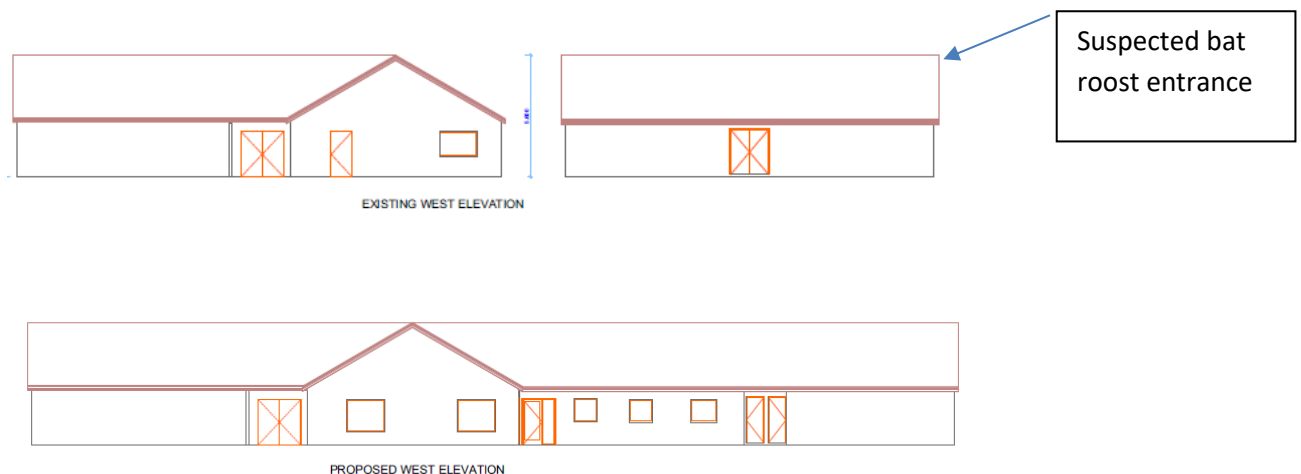
Such a space could accommodate between 20 – 30 saplings spaced at approximately 2m.

## FIGURES

**Figure 1. Location of Dowlais RFC.** Contains Ordnance Survey data © Crown copyright and database right 2013



**Figure 2. Existing and proposed front elevations**



**Figure 3. Proposed bird box and planting locations**



**Figure 4. Proposed bat box and planting locations**



## REFERENCES

Collins, J. (Ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4<sup>th</sup> Edition) Bat Conservation Trust. London

Department of the Environment, Food and Rural Affairs (2016) *MAGIC interactive maps*  
<http://magic.defra.gov.uk/website/magic/>

Natural Resources Wales, designated sites search (2022)  
<https://naturalresources.wales/conservation-biodiversity-and-wildlife/find-protected-areas-of-land-and-seas/designated-sites-search/?lang=en>

Reason, P. F., Wray S, (2023) UK Bat Mitigation Guidelines; a guide to impact assessment, mitigation and compensation for development affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield.

South East Wales Biodiversity Information Centre (2022) Data search Dowlais RFC, Dowlais

## APPENDIX A SITE PHOTOS



Photo 1.  
Front of  
club  
house



Photo 2.  
Club  
house  
building  
southeast  
gable



Photo 3.  
Club  
house  
building  
rear



Photo 4.  
Club  
house  
building  
loft at  
hipped  
roof



Photo 5.  
Club  
house  
building  
loft

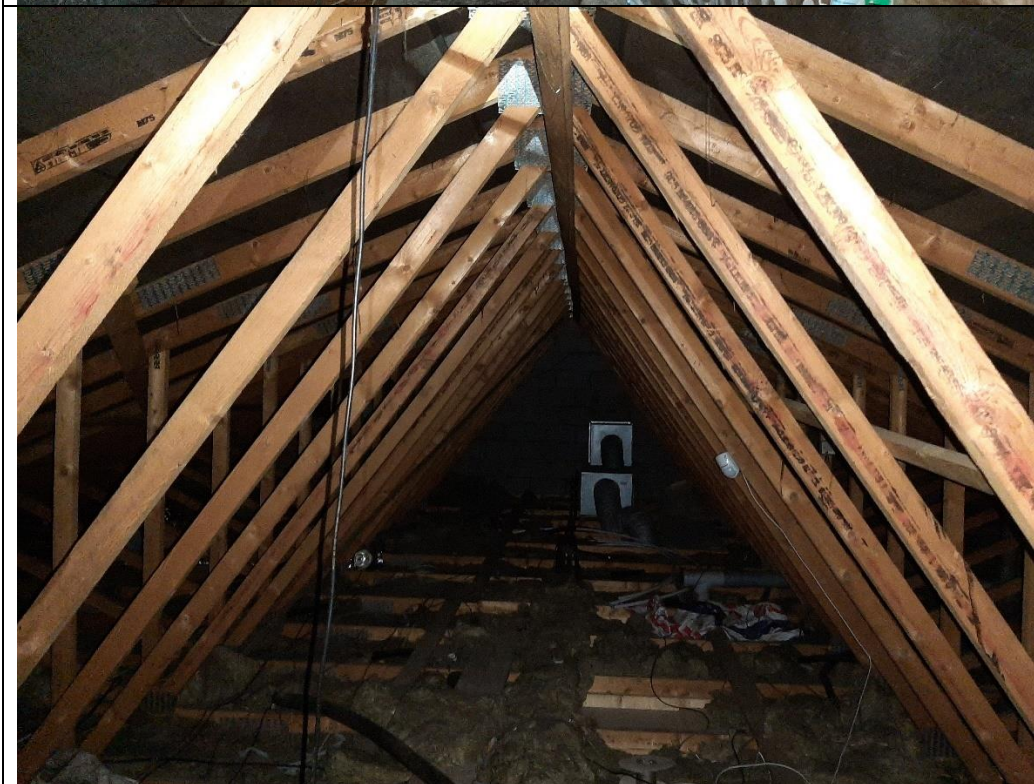


Photo 6.  
Club  
house  
building  
loft



Photo 7.  
Club  
house  
building  
loft



Photo 8  
Club  
house  
building  
loft –  
rodent  
droppings

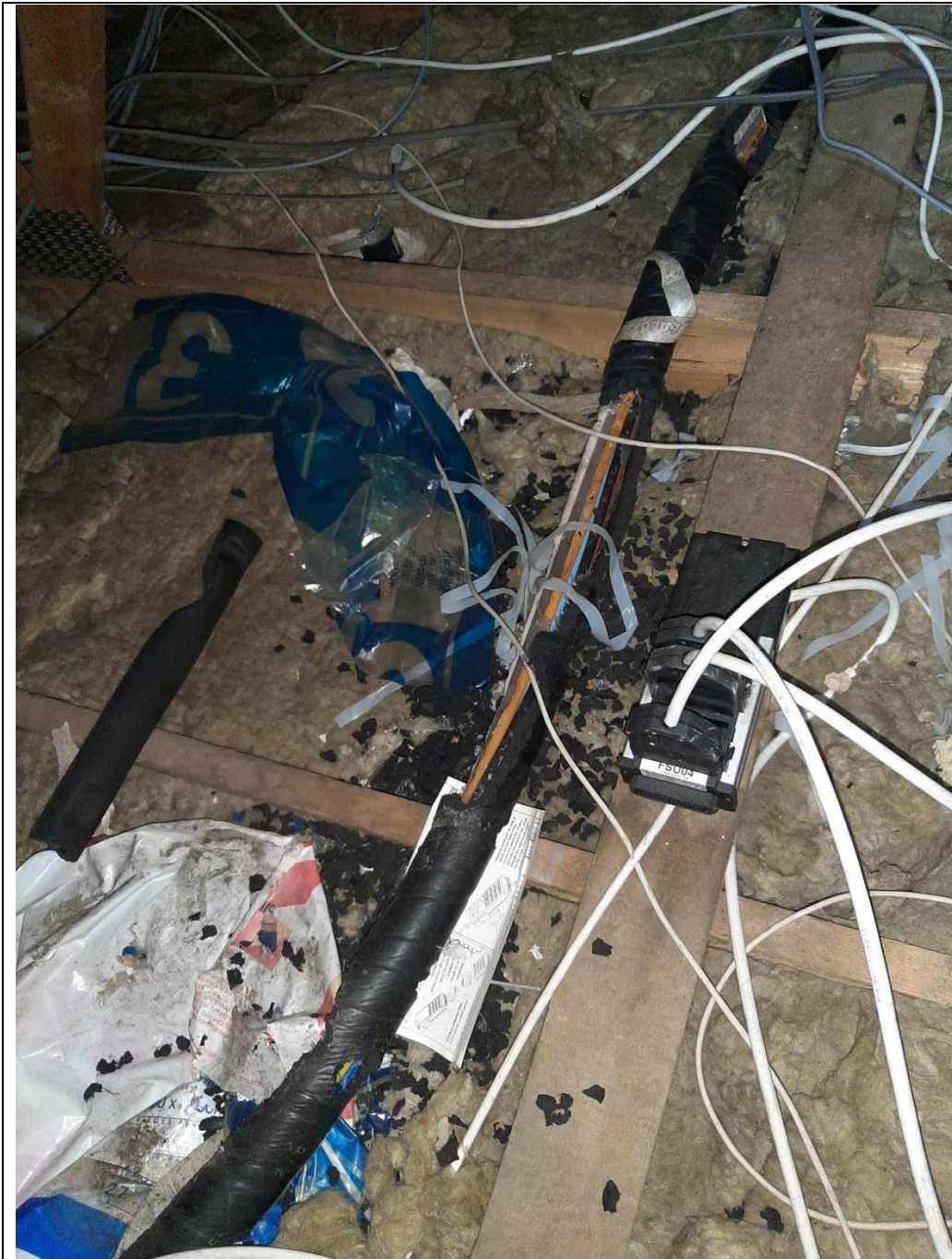


Photo 9.  
Club  
house  
building  
loft –  
lagging  
chewed  
by  
rodents



Photo 10.  
Changing  
room  
building  
front



Photo 11.  
Changing  
room  
building  
northwest  
gable end



Photo 12.  
Changing  
room  
building  
rear



Photo 13.  
Changing  
room  
building  
southeast  
gable end



Photo 14.  
Changing  
room  
building  
gap  
behind  
both  
fascias



Photo 15.  
Changing  
room  
building  
suspected  
bat  
entrance



Photo 15.  
Bat  
droppings  
which  
have  
fallen into  
the loft



Photo 16.  
Close up  
of bat  
droppings  
on top of  
small  
heater  
(switched  
on at time  
of survey)

