



10-13 Pontmorlais West, Merthyr Tydfil

Bat Survey Report

May 2026 | Issue 1VA



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Executive Summary

It is proposed to redevelop the 10-13 Pontmorlais, Merthyr Tydfil.

An initial bat inspection survey was undertaken by BE Ecological Ltd in April 2026. The results indicated that the building is of low potential for roosting bats and as such further surveys were recommended.

Subsequent emergence surveys revealed that the building is not a bat roost.

A European Protected Species Licence will not be required.

No evidence of breeding birds was found on the exterior of the building.

1 INTRODUCTION

1.1 Background

BE ECOLOGICAL LTD was commissioned by the client to undertake an initial bat inspection survey and subsequent activity survey at 11-13 Pontmorlais West, Merthyr Tydfil.

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).

1.2 Site Description

11-13 Pontmorlais is a mid-terrace, multi-storey commercial/residential building located within a historic urban corridor. The structure exhibits a traditional construction style typical of the late 19th or early 20th century, characterized by solid stone and brick masonry with a rendered facade.

The building comprises a pitched roof constructed of tile. There is a two storey flat roof extension to the rear of 13. There is a building that abuts the south eastern corner of the property however, this is not within the same ownership. The ridge of the property runs generally from south west to north east.

There are trees and the Nant Morlais to the rear. There is some connectivity to the wider landscape.

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)

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.

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.

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.

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.

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.

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.

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.

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

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 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

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.

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 Report (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 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.

The major threats to the proper functioning of ecosystems in Wales 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 Plan (NRP) which sets out its commitment to biodiversity in Wales. 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

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

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

3.3 Survey Summary

- The bat survey comprised of two parts:
- Part 1 – Initial bat inspection survey
- Part 2 – A single activity survey

3.4 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 11 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 and Dion Rowles. Michael and Dion have been undertaking surveys with BE Ecological Ltd for the last three years. He is hoping to eventually obtain a bat licence.

3.5 Internal & External Inspection

An initial inspection survey was carried out in April 2026 to search all buildings, both externally to identify potential bat roosting areas and signs of bat use including; live bats, dead bats, droppings, urine staining, grease marks and discarded prey items. The buildings and all areas/items of interest were recorded and photographed. Extension ladders/steps were used to safely access roof areas and fascia boards etc; where no safe access was available the survey was conducted using, close focus binoculars and/or a high powered lamp.

3.6 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.

3.6.1 Survey 1 – 12th May 2026

A dusk survey was carried out on 12th May 2026 using surveyors, positioned in such a way that as much of the building was visible to surveyors as possible. Surveyors were equipped with Batlogger M detectors and thermal imaging devices.

Figure 3: Approximate surveyor/camera locations



Thermal 1 view



Thermal 2 view

3.7 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.

4 RESULTS

4.1 Inspection Survey

4.1.1 External Survey Results

The survey carried out by BE Ecological Ltd revealed no droppings or evidence of bats on the exterior of the building. The following access points were noted:

- Small gaps beneath fascias in some areas (debatable whether or not they are large enough for bat use)
- A gap beneath the drainpipe of the flat roof to the rear (where part of the guttering has fallen away). It is unclear whether there is a gap here that is suitable for bat access.
- There is some ivy growth present on the flat roof extension to the rear, however, the ivy is thin stemmed and unlikely to be used as a roosting feature.

Generally the building appears to be in relatively good order. The barge boards on gables do not have gaps beneath them and the fascias do not appear to have gaps large enough for bats to make use of.

The building was assessed as being of low potential for roosting bats.

4.1.2 Internal Survey Results

Internally, part of the building is used as a tattoo studio with the other half of the building empty and used for storage only.

There is a large roof void that is accessible over part of the building. There are lights present within the void and it is accessed via stairs. The roof is lined with bitumen felt and is not boarded. The roof is not insulated. The roof appears to be extremely draughty.

No bats or evidence of bats was found in this location.

5 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	Start	End	Temp °C	Wind	Cloud Cover	Notes
Survey 1	12/06/26	20:30	22:20	12–10	Low	10–15%	Dry evening, insects flying

5.2 Activity Survey Results

5.2.1 Survey 1 – 12th May 2026

The first bat heard was a common pipistrelle, approximately 20 minutes post sunrise. The bat was seen commuting along the car park adjacent to the property from south to north.

Species heard throughout the course of the survey include common pipistrelle, soprano pipistrelle and myotis sp. Bat calls were heard in bursts, generally as bats foraged/commuted over the car park to the rear of 10 and the vegetation to the rear of 13.

Activity was intermittent throughout the course of the survey with activity appearing to be coming from the same bats foraging over the site.

No bats emerged from or interacted with the building in any way.

5.2.4 Identified Flight Paths (arrowed red)

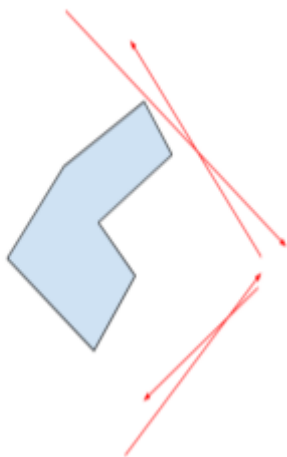


Figure 6: Identified flight paths

In summary bats appear to use the vegetation to the rear and the carpark to the south east.

5.3 Identified Roosts

5.3.1 Survey 1

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

6 CONCLUSION

The property has not been identified as a bat roost. Activity at the site was low to moderate throughout the course of the survey with multiple species heard on site, common pipistrelle, soprano pipistrelle and myotis species.

As the site is within an area of suitable bat habitat, a method statement will be required along with ecological supervision.

A licence from Natural Resources Wales will not be required unless bats or evidence of bats are found.

7 BREEDING BIRDS

No evidence of birds was noted throughout the survey.

8 INTERPRETATION & IMPACT ASSESSMENT

8.1 Active Season Usage

The property was not identified as a bat roost.

8.2 Hibernation Season Usage

It is considered unlikely that bats will use the property over winter however hibernation cannot be ruled out and therefore works must avoid the winter months.

8.3 Breeding Birds

No evidence of breeding birds was noted.

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.

The building has not been identified as a bat roost and therefore impacts on roosting bats are unlikely.

9 MITIGATION / COMPENSATION / ENHANCEMENT

9.1 Bats

The following bat box will be attached to the southern elevation: <https://www.nhbs.com/elisa-bat-box>

9.2 Birds

A Schwegler 1SP Sparrow Terrace or similar (<https://www.nhbs.com/sparrow-terrace-nest-box>) will be attached to the eastern elevation.

10 RECOMMENDATIONS

10.1 Timing

It is considered that the building is not a bat roost and therefore the works can be undertaken at any time of year. The winter period should be avoided due to the possible presence of hibernating bats.

10.2 Timber/Roofing Materials

N/A the property has not been identified as a bat roost.

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.

Boundary vegetation must remain unlit.

10.4 Bat Licensing

A European Protected Species Licence obtained from Natural Resources Wales will not be required before any works commence.

10.5 Supervision

Supervision for the removal of the roof will be required.

11 METHOD STATEMENT (NON-LICENSED)

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 ivy on the exterior of the building will be checked by the ecologist for the presence of bats and birds.
4. All suitable bat roosting features will need to be removed by hand (metal sheets) and inspected by the onsite bat ecologist.
5. The sheets 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.
6. 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.
7. If bats or their signs are found, a EPS licence may be required before works can legally resume.

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 REFERENCES

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

Mitchell-Jones, A.J. & McLeish, A.P. (2004) *The bat workers' manual (3rd Edition)*. Joint Nature Conservation Committee.

Mitchell-Jones, A.J. (2004). *Bat Mitigation Guidelines*. Natural England.

The Conservation of Habitats and Species Regulations 2017 (as amended) (HMSO).

The Natural Environment and Rural Communities Act (2006) (as amended) (HMSO).

The Wildlife and Countryside Act 1981 (as amended) (HMSO).

Appendix A – Site Photographs



Plate 1 – Photograph of roof void



Plate 2 – Photograph of roof void



Plate 3 – Photograph of front elevation fascias

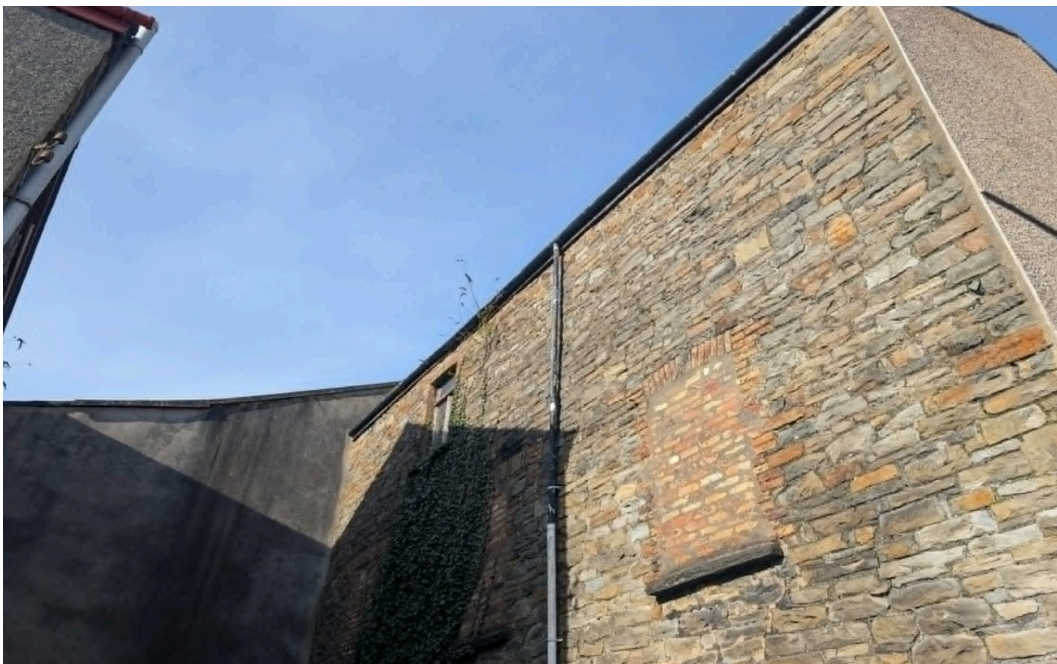


Plate 4 – Photograph of rear of number 10



Plate 5 – Photograph of gable end of 13 showing tight fitting cement



Plate 6 – Photograph of rear two storey extension with snapped guttering



Plate 7 – Example of tight fitting tiles