

Technical Note

Sheet 1 of 8

Job name: Ffos y Fran Restoration Strategy

Our ref: 3274

Job no: 3274

Date of note: 14.01.2026

Date of review:

Note by: Dr. Adam Lynch

Reviewed by: Jon Stoddard

Ref. **Note on storage shed suitability for roosting bats**

Action:

This Technical Note has been prepared to provide additional supporting detail in relation to the bat suitability assessment presented within the submitted Ecological Impact Assessment (EcIA) for the Ffos-y-Fran Final Restoration Strategy planning application¹. The note has been produced specifically to address matters raised by the Merthyr Tydfil County Borough Council ecologist within an internal memorandum dated 2nd March 2025, in which it was stated that insufficient evidence/justification had been provided to support the EcIA conclusion that the on-site buildings/structures were unlikely to support roosting bats, and that further detail was required in respect of bat-related conclusions². In response, the buildings were re-visited by RML ecologists on 16th October 2025 and were subject to a further targeted inspection, supported by additional photographs (**Table 1**), with the findings presented below to substantiate the assessment of negligible roost suitability.

There are three storage and/or workshop sheds on this central area of the site that lie north of Bogey Road and used during the operational phase of the mine for servicing vehicles and materials storage (**sheds A-C; Figure 1**). The sheds comprise single-storey steel portal-frame industrial storage buildings with profiled metal wall and roof cladding (including rooflight panels on sheds B and C), set on a concrete slab and accessed via large roller shutter doors and a personnel door.

Roosting bats in the UK typically select buildings that provide sheltered cracks/crevices, small openings and roof voids, with a favourable and relatively stable microclimate, and (for many species) low levels of artificial lighting around roost access points. In contrast, modern metal-clad portal-frame sheds of this type generally offer few suitable roosting features (e.g., a lack of tiled roofs, soffits and complex junctions that create concealed crevices), and any minor gaps that do occur are more likely to be exposed to draughting and rapid temperature fluctuation due to the thin metal envelope and large door openings, making them less suitable for maintaining the stable conditions bats tend to use. In addition, as equipment stores, they are typically subject to regular human activity, vehicle/machinery movements and lighting, and guidance³ notes that lighting in the vicinity of roosts/access points can disturb bats and deter use where alternative roosts are available. On this basis, the three sheds are considered to have negligible potential to support roosting bats.

¹ Richards, Moorehead & Laing Ltd (2024) *Ecological Impact Assessment (EcIA): Ffos-y-Fran Final Restoration Strategy*. Report ref. 3274/11, Rev 0, approved 05 December 2024. Prepared on behalf of Merthyr (South Wales) Ltd.

² Davies, M. (2025) *Internal memorandum: ecological comments in response to the submitted EcIA and supporting documents for the Ffos-y-Fran Final Restoration Strategy planning application*. Merthyr Tydfil County Borough Council, dated 02 March 2025.

³ Bat Conservation Trust and Institution of Lighting Professionals (2023) Guidance Note 08/23: Bats and artificial lighting in the UK. ILP, Rugby

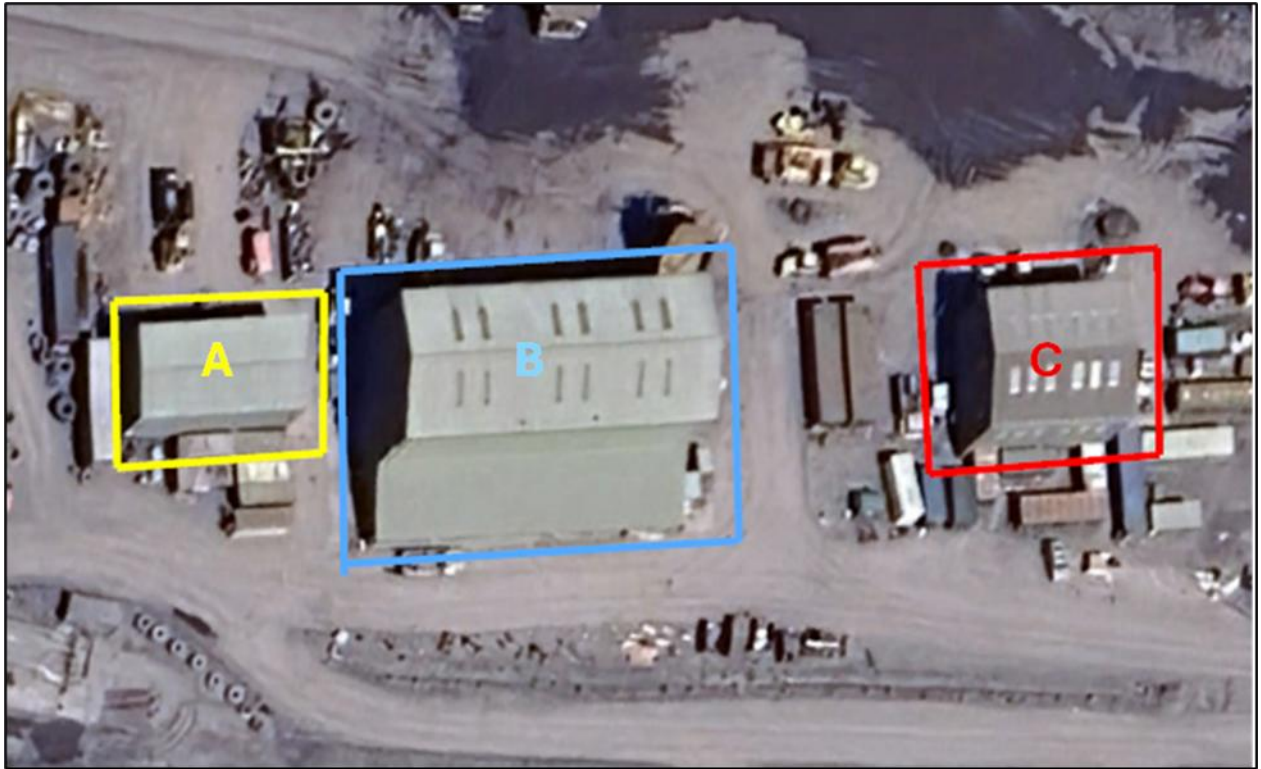


Figure 1. The three sheds with arbitrary reference letters (A-C) corresponding to photographs in Table 1.

Table 1. Photographs of sheds A-C.

Shed A

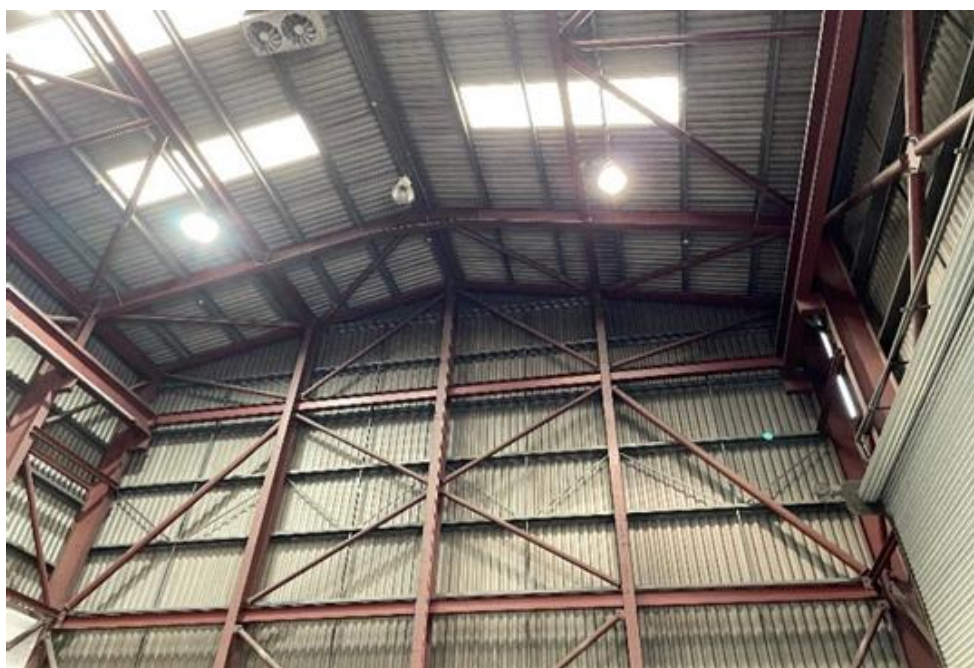
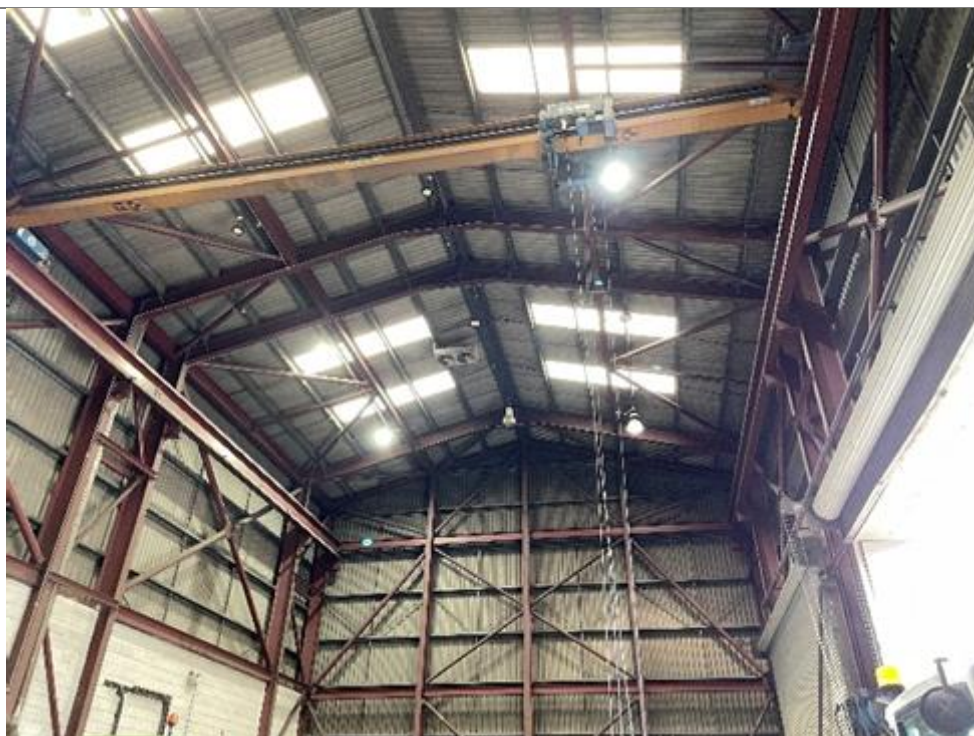






Shed B





Shed C

