



THOMAS ECOLOGY AND ARB LTD

PRELIMINARY BUILDING INSPECTION IN RESPECT OF BATS:

**148 High St
Merthyr Tydfil
CF47 8DP
SEPTEMBER 2024**

**Mr James Thomas
Yew Tree Farm,
Glascoed,
NP4 0TG**

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Thomas Ecology and Arb Ltd
Plas Parke
Carmarthen
SA32 7BE

gerhardddthomas@gmail.com

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Mr James Thomas
Yew Tree Farm,
Glascoed,
NP4 0TG

Proposed Development: **148 High St, Merthyr Tydfil, CF47 8DP**

Preliminary Building Inspection in Respect of Bats

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Thomas Ecology and Arb Ltd, Plas Parke, Carmarthen, SA32 7BE

gerhardthomas@gmail.com

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Number	Title

NON-TECHNICAL SUMMARY

It is proposed to carry out building modifications and extension at, 148 High St, Merthyr Tydfil, South Wales.

Therefore, a Preliminary building inspection in respect of bats and birds was undertaken of the site by Thomas Ecology and Arb Ltd in September 2024. The survey was carried out in accordance with current (at the time) guidance on standards of survey for bats (Collins (Ed) Bat Conservation Trust (BCT) 2023).

The inspection identified no live bats but found evidence of bats within the loft space. Evidence included Bat droppings and feeding remains. Large cavities merging into adjoining loft spaces both North and South allow for passage of Bats between buildings. There are several cavities in the West facing loft wall that can support bats roosting.

Externally on the West facing wall (Northern edge of building) beneath the guttering there are cavities that appear to extend beneath the soffit board. These may be suitable as entry/egress points or potential roosting spaces for bats. The neighbouring property to the South has potential access points for bats on the East and West facing walls that can lead to bats accessing that loft and then have free access into the surveyed loft at 148 High St, Merthyr Tydfil.

The West facing wall where the extension is planned for have no signs or potential access point/features.

Overall, the building must be considered as being of a high value to and for roosting bats unless further surveys can permit this classification to be downgraded.

Due to there being no access to the roof spaces of the neighbouring Southern and Northern properties and potential bat access points, I recommend that a minimum of 3 dusk activity surveys are carried out that should include the neighbouring properties East and West facing aspects so that the classification of the building can be determined accurately. Also, internal monitoring by static cameras is recommended to confirm use of loft space as for transit by bats or indeed as a roosting space.

If the extension will have no impact on the loft space or the West facing walls most northern part next to the guttering during construction it is deemed that no further surveys will be required as there will be no impact on potential access/egress or roosting features.

At this stage, it is not possible to confirm whether a Natural Resources Wales development licence will be necessary.

No signs of nesting birds or potential for nest locations were found during the Preliminary survey.

1 INTRODUCTION

1.1 BACKGROUND

A Preliminary building inspection in respect of bats and birds was undertaken in September 2024 by Thomas Ecology and Arb Ltd of a property, 148 High St, Merthyr Tydfil, CF47 8DP, South Wales, to support a planning application to the Merthyr Tydfil County Borough Council. This survey report therefore details the findings of the building inspection undertaken in September 2024.

This inspection did not identify any live bats on the site but did however find and confirmed signs of presence of bats that included bat droppings and feeding remains that confirm bats to be present or to be using the loft space for transit.

The presence of potential access points and inability to access the spaces served by them, it is not currently possible to accurately classify the roost status of the building. The further surveys recommended will provide the information necessary to be able to classify the building accurately. However, a classification of High potential is suitable in line with the recommendations.

It is considered that, if the loft space or northern part of the West facing wall will be impacted by the building works there is requirement for activity surveys, concentrating on the eastern and western facing external walls (to include neighbouring property connected to the south) the roof space need to have static cameras to monitor and evaluate use by bats, prior to any planning determination because of the potential access points for bats into that space. This is because it was not possible for the surveyor to access adjoining roof spaces or gain access to the cavities on the external walls.

The survey was carried out in accordance with current guidance on standards of survey for bats (Bat Conservation Trust, 2023¹) as required by Natural Resources Wales (NRW) and CC.

1.2 SURVEYOR INFORMATION

The survey was undertaken by Gerhard Thomas (Accredited agent on NRW license number: S092953-1(Hugh Dixon)). Gerhard has been accredited on this all-counties bat survey licence in Wales since 2022 assisting the licence holder with various bats surveys for commercial and voluntary purposes, dealing with a range of species and situations.

1.3 SITE DESCRIPTION

148 High St is located in Merthyr Tydfil towards the centre of town in South Wales (NGR SO 04944 05888; **Figures 1 & 2**). Photos are at **Appendix A**).

The property (**Plates 1 - 3**) is a three-storey structure of brick construction under a Marley Mendip style concrete tiled roof, the ridge of which is oriented generally east-west. There are no chimneys. The roof has a Velux window in the southeastern corner allowing for daylight to enter which lights up the eastern part of the loft during daytime hours.

¹ *Bat Surveys for Professional Ecologists - Good Practice Guidelines* (Collins, J (Ed). BCT, 2016)

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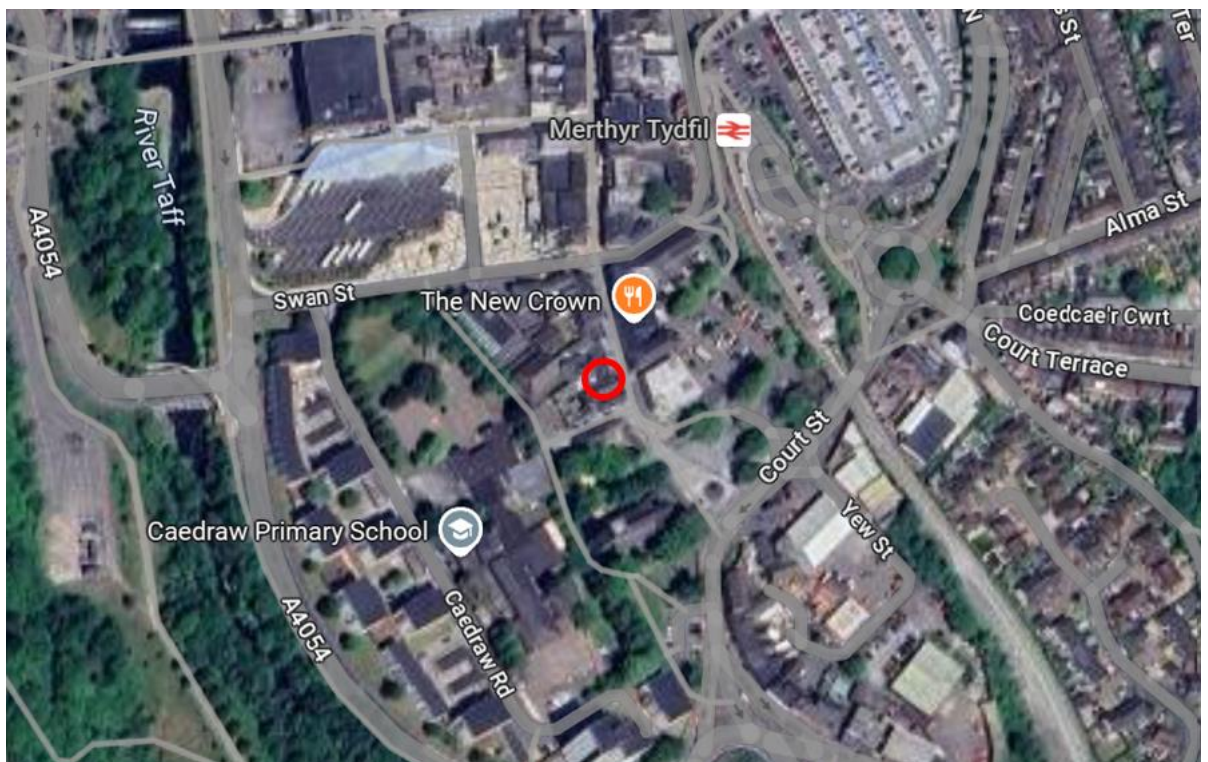
The loft space has large cavities connecting to the adjoining properties both south and north. The roof beams are exposed with felt lining in between. The floor is partially covered by wood to allow use for storage and the uncovered areas have exposed insulation.

The west facing wall of the property has a open fire escape covering all 3 levels.

The site is in a wholly urban area towards the centre of Merthyr Tydfil and is surrounded by commercial properties and roads.

The river Taff is approximately 200meters to the West and have small, wooded areas bordering it.

Figure 1 - general aerial view of 148 High St, Merthyr Tydfil (circled Red)



(Image courtesy of Google Earth)

Figure 2 - aerial view of 148 High St, Merthyr Tydfil (property borders marked in Red)



(Image courtesy of Google Earth)

2 BAT ECOLOGY

British bats are small flying nocturnal mammals that feed exclusively upon insects. There are 17 species resident in Britain, ranging in size from the small pipistrelle species up to the larger noctule (*Nyctalus noctula*), serotine (*Eptesicus serotinus*) and greater horseshoe bat (*Rhinolophus ferrumequinum*). Bats are active from April through to October and hibernate when insects are in short supply in the winter months. Bats emerge from hibernation in late March - early April and move into their transition / intermediary roosts. Female bats will move to maternity sites by the beginning of May and will give birth to a single baby between June and early July. The baby is reared solely by the mother and is weaned and independent by end of August. After breeding, bats move to transition / intermediary roosts and females will visit males at mating roosts. During the autumn, bats feed voraciously to gain weight for the hibernation ahead.

Although traditionally trees, caves and rock faces were used by roosting bats and are still used, many different structures are used nowadays by bats, which take advantage of readymade (man-made) roosts. Structures used frequently include bridges, ice-houses, pill-boxes, disused railway tunnels, houses and barns etc. Bats have home ranges which vary from species to species; from just 3-4km from the roost for the smaller bats while the larger noctule may fly 20km or more. Threats to bats include habitat destruction and the severance of commuting routes, use of agricultural pesticides, intensification of farming methods and deliberate persecution by man. Bats have few natural predators; however the domestic cat is probably the most efficient predator.

3 LEGISLATION AND POLICIES

3.1 CONSERVATION OF HABITATS AND SPECIES REGULATIONS

European Union legislation required that member states designate sites for the protection of habitats and species included in the annexes of both Council Directive 92/43/EC on the Conservation of Natural Habitats and of Wild Flora and Fauna (the Habitats Directive) and Council Directive 79/409/EEC on the Conservation of Wild Birds (the Birds Directive). This legislation is implemented in the UK by the Conservation of Habitats and Species Regulations 2017 (as amended) ("the Habitat Regulations").

The Habitat Regulations (2017) provided safeguards for European Protected Species (those listed under Annex IV Habitats Directive). With regards to bats, this made 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.

It should be noted that although from 31st January 2021 the UK is no longer a member state, protection enacted under the Conservation of Habitats and Species Regulations 2017 (as amended) will continue to apply in UK law through the Conservation of Habitat and Species (amendment) (EU Exit) Regulations 2019 and the European Withdrawal Act 2018 following the implementation of Brexit until notified otherwise.

Working in protected sites or disturbing protected species is possible as long as consent has been issued by Natural Resources Wales (NRW).

It is possible to undertake damaging activities under the auspices of a Protected Species Licence issued by NRW which provides a derogation from the Regulations, meaning that an otherwise illegal operation carried out under licence is lawful.

3.2 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 in or at a roost;
- Intentionally or recklessly obstruct access to a roost;
- Intentionally destroy, damage or otherwise disturb a roost (whether bats are present or not); and
- Intentionally or recklessly kill, injure or take (capture) a bat.

3.3 THE ENVIRONMENT (WALES) ACT, 2016

The Environment (Wales) Act 2016 sets out the requirement for the 'sustainable management of natural resources' together with new ways of working to achieve this. Part 1 of the Environment Act sets out Wales' approach to planning and managing natural resources at a national and local level with a general purpose linked to statutory 'principles of sustainable management of natural resources' defined within the Act.

Section 6 – Biodiversity and resilience of ecosystems duty

Section 6 under Part 1 of the Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (the S6 duty) for public authorities in the exercise of functions in relation to Wales.

The S6 duty requires that public authorities must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems.

Section 7 - Biodiversity lists and duty to take steps to maintain and enhance biodiversity.

This section replaces the duty in section 42 of the NERC Act 2006. The Welsh Ministers will publish, review and revise lists of living organisms and types of habitats in Wales, which they consider are of key significance to sustain and improve biodiversity in relation to Wales.

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

Part 1 of the Act, including Sections 6 and 7, came into force on May 21, 2016.

Other elements of NERC 2006 may still apply.

3.4 THE NATURAL ENVIRONMENT AND RURAL COMMUNITIES ACT, 2006

Section 40 of the NERC Act places a duty to conserve biodiversity on public authorities in England (and, for parts of the legislation, Wales). It requires local authorities and government departments to have regard to the purposes of conserving biodiversity in a manner that is consistent with the exercise of their normal functions such as policy and decision-making. 'Conserving biodiversity' may include enhancing, restoring or protecting a population or a habitat.

Section 41 requires the Secretary of State to publish and maintain lists of species and types of habitats which are regarded by Natural England to be of "principal importance" for the purposes of conserving biodiversity in England. These 56 priority habitats and 943 species are drawn from earlier lists of United Kingdom Biodiversity Action Plan Priority Species and Habitats. The Section 41 lists are needed by decision-makers in local and regional authorities when carrying out their duties under Section 40 of the Act.

A public authority can be a:

- local authority including a unitary, county, district, community, parish or town council
- government department or one of their executive agencies

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- non-departmental government body
- NHS Trust
- utility company
- body carrying out functions of a public character under a statutory power.

3.5 THE WELL BEING OF FUTURE GENERATIONS (WALES) ACT, 2015

The Well-being of Future Generations Act became law in April 2015 and is concerned with improving the social, economic, environmental and cultural well-being of Wales.

It will make the public bodies in Wales listed in the Act think more about the long-term, work better with people and communities and each other, look to prevent problems and take a more joined-up approach.

To help public bodies achieve the same vision, the Act puts in place seven well-being goals. Linked to the goals a set of National Indicators are currently under development to help measure whether we are achieving the goals including the Resilient Wales goal.

Resilient Wales' goal

'A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).'

The Well-being of Future Generations Act recognises the importance of nature and its biodiversity The resilient Wales' goal will help with nature recovery objectives in Wales.

The Act establishes a statutory Future Generations Commissioner for Wales to support the public bodies listed in the Act to work towards achieving the well-being goals.

The Act also establishes Public Services Boards (PSBs) for each local authority area in Wales. PSBs are tasked with improving the economic, social, environmental and cultural well-being of its area by working to achieve the well-being goals.

4 METHODOLOGY

The inspection consisted of two parts:

- Biological records data search;
- Visual inspection;

The assessment was undertaken in accordance with the latest guidance on bat surveys and current best practice as required by CC.

4.1 DESK STUDY

A desk study was undertaken as part of the Building Inspection involving gathering data from the Southeast Wales Biodiversity Records Centre (SEWBRc). The search included all submitted records on about all species of bats and nesting birds from within a buffer of 2km.

Previous surveys of the site were consulted where known and available.

4.2 EXTERNAL & INTERNAL DAYTIME ASSESSMENT

4.2.1 External assessment

The building was subject of an external inspection by an accredited bat licensed ecologist on 21st September 2024 to assess the potential of the building to support bats. The assessment also aimed to identify any features that may be used by bats. The assessment was subjective and based primarily upon the building's structure, current use, location and the presence (or otherwise) of suitable roosting locations within it. The assessment involved a scan of the building's exterior using binoculars and high-resolution camera. The inspections included:

- checking the exterior of the structure for locations that appeared potentially suitable for use by bats as roosts or as access points to roosts further inside the building; and
- closer inspection of such locations for bats and signs of use by bats.

4.2.2 Internal Assessment

Following the external inspection, an internal daytime assessment was undertaken using a torch and where appropriate an endoscope to search all safely accessible internal voids (including roof spaces, cellars etc.) deemed to be potentially suitable for use by bats as roosts.

Internal inspections continue the assessment carried out previously of the external fabric of the buildings and also to look for direct evidence of bats within the buildings. Evidence may survive inside buildings, whereas weather will quickly deteriorate any evidence on the outside surfaces of buildings. Evidence of roosting bats includes:

- Live or dead bats;
- Bat droppings;
- Fur oil/urine staining;
- Feeding remains;

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- Characteristic scratches; and
- Noise made by bats.

4.3 BAT ACTIVITY SURVEY

No activity surveys were carried out at this time due to seasonal constraints.

4.4 CONSTRAINTS

There may be species records either not submitted to the local biological records centre or currently waiting to be digitised. Therefore, where undertaken, a negative return on a records search does not permit the assumption that bats are not present.

The neighbouring roof spaces was inaccessible to humans.

There were no other constraints to the survey.

5 RESULTS**5.1 DESK STUDY****5.1.1 Designated sites**

NA

5.1.2 Species

A desk study identified 62 records of birds, 222 records of bats, 7 confirmed bat species and 3 broad / non-species-specific classifications within 2kms of the property.

The closest bird record was of a Swift (*Apus apus*) nesting 97m from the site.

The closest bat record was of an unclassified bat (*Chiroptera*), roosting 111m to the north-west of the site in the boiler room of Hollies Health Centre. The closest record of foraging bats was 237m west of the site over the river Taff.

The following species were present in the data search results:

Scientific Name	Common Name
<i>Chiroptera</i>	Bat
<i>actual_nam</i>	common_nam
<i>Apus apus</i>	Swift
<i>Coloeus monedula</i>	Jackdaw
<i>Cyanistes caeruleus</i>	Blue Tit
<i>Delichon urbicum</i>	House Martin
<i>Falco peregrinus</i>	Peregrine
<i>Falco tinnunculus</i>	Kestrel
<i>Hirundo rustica</i>	Swallow
<i>Larus argentatus</i>	Herring Gull
<i>Larus fuscus</i>	Lesser Black-backed Gull
<i>Motacilla alba</i>	Pied/White Wagtail
<i>Parus major</i>	Great Tit
<i>Passer domesticus</i>	House Sparrow
<i>Phoenicurus phoenicurus</i>	Redstart
<i>Sturnus vulgaris</i>	Starling
<i>Troglodytes troglodytes</i>	Wren
<i>Chiroptera</i>	Bat
<i>Eptesicus serotinus</i>	Serotine
<i>Myotis daubentonii</i>	Daubenton's Bat
<i>Myotis nattereri</i>	Natterer's Bat
<i>Myotis</i>	Myotis Bat species
<i>Nyctalus noctula</i>	Noctule
<i>Nyctalus</i>	Nyctalus Bat species
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle
<i>Pipistrellus pipistrellus</i>	Pipistrelle
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle
<i>Pipistrellus</i>	Pipistrelle Bat species
<i>Plecotus auritus</i>	Brown Long-eared Bat
<i>Plecotus</i>	Long-eared Bat species

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Scientific Name	Common Name
<i>Rhinolophus ferrumequinum</i>	Greater Horseshoe Bat
<i>Rhinolophus hipposideros</i>	Lesser Horseshoe Bat
<i>Eptesicus serotinus</i>	Serotine
<i>Myotis</i>	Myotis Bat species
<i>Nyctalus noctula</i>	Noctule Bat
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle
<i>Pipistrellus</i>	Pipistrelle Bat species
<i>Plecotus auritus</i>	Brown Long-eared Bat
<i>Rhinolophus hipposideros</i>	Lesser Horseshoe Bat
<i>Rhinolophus ferrumequinum</i>	Greater Horseshoe Bat

The species records include summer (non-breeding), maternity and day roosting records. Non-roosting records are of bats either foraging or commuting.

5.1.3 Previous surveys

No known previous surveys.

5.1.4 Summary

There are no records of bats from the buildings.

The area surrounding the site is considered to be one that is likely to be used by bat species more easily habituated to urban, lit environments.

5.2 EXTERNAL DAYTIME ASSESSMENT

Neither bats nor evidence of bats was observed externally.

Potential access points were identified:

- 1) Via cavities beneath soffit board below guttering on northern end of west facing wall.
(Figure 3).

Figure 3 – Cavities under soffit board.

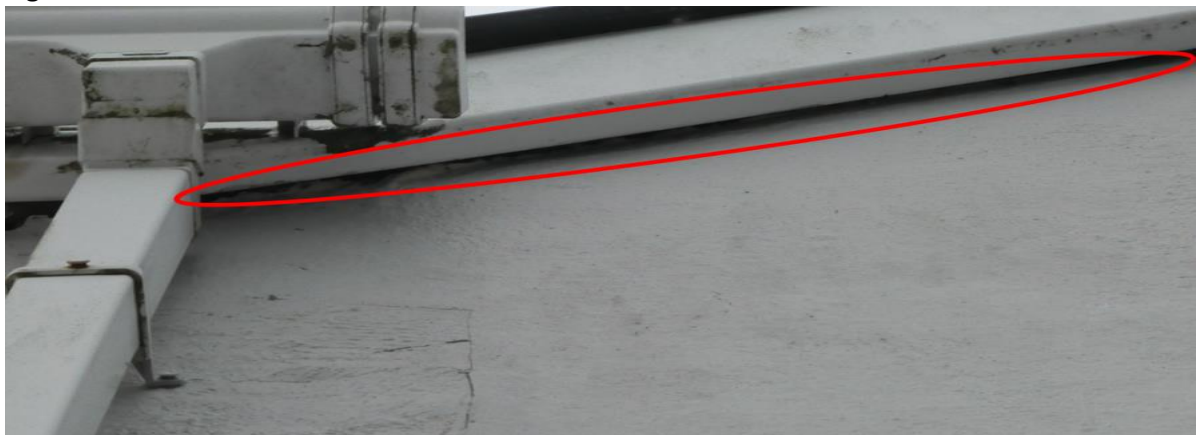


Image taken during survey.

5.3 INTERNAL DAYTIME ASSESSMENT

No bats were observed during the internal survey, but evidence of bats was observed in the loft space. Potential roost sites were identified:

- 1) Between the roof beams and west facing wall. (Figure 4).
- 2) Bat droppings and feeding remains. (Figure 5).

Figure 4.



Figure 5.



6 EVALUATION OF ECOLOGICAL FEATURES

The potential access points on the northern edge of the west facing wall and multiple potential access points on the western and eastern facing walls of the neighbouring property to the south that has open spaces in the loft that connects both neighbouring properties and the evidence of bat dropping and feeding remains proves that there are bats using the loft space.

As a result, it is considered that the loft space at 148 High St, Merthyr Tydfil is of **HIGH** ecological importance to and for bats, this can only be confirmed on completion of further external activity survey visits and static camera monitoring of the loft space.

CONFIDENCE LEVEL: HIGH

6.1 WINTER USE

It is considered that the loft space can be used by several species of Bats during winter due to a variety of suitable roosting features.

CONFIDENCE LEVEL: HIGH

6.2 BAT ROOST LOCATIONS

None known.

6.3 INCIDENTAL RECORDS

None.

7 IMPACTS OF DEVELOPMENT

7.1 PROPOSED DEVELOPMENT

It is proposed to demolish part of the existing extension and replace it with a three-level extension to the rear of the property.

7.2 PREDICTED IMPACTS WITHOUT MITIGATION

It is not currently possible to state definitively whether or not there will be any adverse impacts on roosting bats as further surveys are required.

7.3 MITIGATING THE IMPACTS

The need for mitigation will be determined by confirmation of on whether there will be an impact on potential access points or the loft itself.

8 MITIGATION / ENHANCEMENT

8.1 MITIGATION

Not yet known.

8.2 ENHANCEMENTS (BATS)

Biodiversity enhancements will be included within the project design and will be determined on either completion of further activity surveys or requirements imposed by Merthyr Tydfil County Borough Council.

9 GENERAL RECOMMENDATIONS

9.1 LICENSING

There is no requirement for a Natural Resources Wales development license at this time, until confirmation is made on whether building works will have an impact or not on the potential access points or loft space.

9.2 SUPERVISION

Not currently known.

A suitably experienced and licensed ecologist will be “on call” for the duration of the project if bats are discovered at any point.

9.3 TIMESCALES

There are currently no seasonal constraints on timescales. However, this will be confirmed / determined on completion of the activity surveys or whether there will be an impact on potential access points or the loft itself.

9.4 LIGHTING

There are currently no constraints on lighting. However, this will be confirmed / determined on completion of the activity surveys or whether there will be an impact on potential access points or the loft itself.

9.5 MATERIALS

Currently, there are no constraints on materials. However, this will be confirmed / determined on completion of the activity surveys or whether there will be an impact on potential access points or the loft itself.

10 CONCLUSION

It is proposed to demolish part of the existing extension to the rear of the property, 148 High St, Merthyr Tydfil, CF47 8DP and building a three-storey extension in its place.

All bats are **internationally** important as they are protected by European law. Therefore, any roost where they are found is of **high** ecological importance.

There are multiple records in the area and evidence of bats in the accessible parts of the buildings loft space. Due to the presence of potential access points and roosting locations, it is considered that the building must be considered as being of a **high** potential ecological value to and for bats. Only further surveys both internal and external during the survey season will allow for enough information to be gathered to conclusively classify the loft spaces usage and potential access points viability.

A licensed ecologist will be “on call” for the duration of the project and consulted immediately in the event that bats are discovered at any later stage of the development.

If the potential access point on the northern part of the west facing wall or the existing loft are to be impacted by building works 3no. activity surveys are recommended of the western and East facing walls with static camera monitoring of the loft space to confirm nature of use by bats. Mitigation and a Natural Resources Wales development licence may be required in the event that these afore mentioned areas are to be impacted.

If building works are not to directly affect the loft space or potential access point on the northern part of the west facing wall then the works should be allowed to be carried out without any further surveys as it will not affect bats potentially present.

Biodiversity enhancements will be included in the design but will be confirmed on completion of the recommended activity surveys.

11 REFERENCES

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APPENDIX A – PHOTOGRAPHS

Plate 1 –Eastern (Front) elevation



Plate 2 – Western (Rear) elevation





Plate 4 – Internal views of eastern wall in loft



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Plate 5 – Internal view of western wall in loft



Plate 5 - Internal views of northern wall in loft



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Plate 6 - Internal views of southern wall in loft



Plate 7 - Internal views of loft looking from east to west



Plate 8 – Velux window in roof south eastern side of loft





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Plates 10a, b, c – Neighbouring property to southern end of property with tile frontage. (Potential access points circled red)



Plate 11 – View of neighbouring property to southern end rear wall with openings to loft



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November 2024

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