



Former Troedyrhiw Library

Troedyrhiw

Bat and Nesting Bird Survey Report

September 2021

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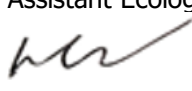
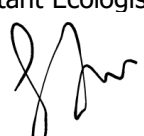
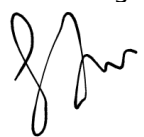
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DOCUMENT CONTROL

Former Troedyrhiw Library, Troedyrhiw Preliminary Bat Roost and Nesting Bird Assessment				
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Bat and Nesting Bird Survey Report				
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1.0	06 September 2021	Arina Huang Assistant Ecologist 	Ffion Jones Assistant Ecologist 	Paul Hudson MCIEEM Principal Ecologist 

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Summary

Brief and Site Location	This report presents the findings of a preliminary bat roost assessment and nesting bird survey of the Former Troedyrhiw Library located at Tyntaldwyn Road, Troedyrhiw, Merthyr Tydfil CF48 4NG (Ordnance Survey Grid reference SO 0720 0243).
Survey Methodology	The survey comprised the following: • A preliminary bat roost assessment of the former library searching for signs of bats and nesting birds; and • One dusk emergence survey of the former library.
Results of Dusk Emergence Survey	No bats emerged from the former library during the dusk emergence survey.
Nesting Birds	No evidence of past or current nesting by birds was recorded.
Requirements for Additional Survey	None required.
Predicted Impacts of Development on Bats and Nesting Birds	Based on the conclusion that bats are unlikely to be using the library as a roost site, no negative impacts on bats are anticipated. Based on the conclusion that birds are not currently nesting in the library, no negative impacts on birds are anticipated.
Licensing Requirements for Bats	None required.
Recommendations and Precautionary Measures	Detailed recommendations are given in Section 6 of this report. These include precautionary methods and guidance for action to take if bats are found during the works.

1. Introduction

1.1. Brief

This report presents the findings of a bat and nesting bird survey of the former Troedyrhiw Library located at Tyntaldwyn Road, Troedyrhiw, Merthyr Tydfil, CF48 4NG (Ordnance Survey Grid Reference: SO 0720 0243)¹. The building proposed for development is referred to as the 'former library' throughout the remainder of this report.

The former library is within the boundary of Merthyr Tydfil Council.

1.2. Site Description

The former library is situated within the village of Troedyrhiw which is to the south-east of the town Merthyr Tydfil. The former library is within a suburban area with residential properties to the north-west, west, south and south-east but to the north-east and east it is bordered by a woodland and grassland area with the wooded river corridor of the Afon Taf within 1km to the west.

The location of the former library is shown on Plan 1: Location Plan.

1.3. Proposed Works

The planning proposal consists of converting the former library into a detached three-bedroom residential property with associated parking and is currently pending consideration (Planning Reference Number: P/21/0134²). No works to the slate roof, external walls or the soffit boxes on the eastern, southern, northern or western elevations are proposed as part of the development. A metal flue on the western elevation of the former library is proposed to be fitted around the soffit and not impact it directly. Additionally, new windows are to be fitted which will impact the gaps in the window frames on the northern elevation. At the time of writing architectural plans have not been finalised.

1.4. Legislation and Planning Policy

1.4.1. Bats

All UK species of bat are protected species. Their breeding sites or resting places³ (roosts) are fully protected under the Wildlife and Countryside Act 1981⁴ (as amended) and the Conservation of Habitats and Species (Amendment) (EU Exit) [CHSAEU] Regulations 2019⁵.

¹ Latitude and Longitude: 51.712854 , -3.3445421 / what3words: camps.vest.race

² Planning Portal: <https://www.merthyr.gov.uk/resident/planning-and-building-control/planning-search-and-weekly-lists/>

³ Resting places are defined as 'areas that are essential to sustain an animal or group of animals when they are not active' (Anon 2007).

⁴ <https://www.legislation.gov.uk/ukpga/1981/69>

⁵ <https://www.legislation.gov.uk/ukdsi/2019/9780111179512>

Works affecting bats are subject to licensing procedures by Natural Resources Wales (NRW). The legal protection and licensing procedures are summarised in Appendix 1.

1.4.2. Nesting Birds

All wild British birds (whilst building nests, nesting and sitting on eggs) and their nests and eggs, (with certain limited exceptions⁶) are protected by law under Section 1 of the Wildlife and Countryside Act 1981⁷ (as amended) and the Countryside and Rights of Way Act 2000⁸. Some species, such as barn owls (*Tyto alba*), are listed in Schedule 1 and have additional protection from disturbance during the breeding season, as do their nests, eggs and dependent young.

1.5. Survey Scope

The survey comprised the following:

- A preliminary bat roost assessment which included a survey for nesting birds; and
- One dusk emergence survey of the former library.

1.6. Reporting

This report aims to:

- Outline the survey methodology used;
- Present the results of the survey;
- Provide an interpretation of the survey results;
- Determine the need for further targeted surveys; and
- Provide suitable recommendations in line with planning policy and wildlife law, including potential licencing requirements, mitigation, compensation and enhancement measures.

⁶ Details of the exceptions are available at <https://bit.ly/2KiQTFH>

⁷ <https://www.legislation.gov.uk/ukpga/1981/69>

⁸ <https://www.legislation.gov.uk/ukpga/2000/37>

2. Methods

2.1. Desk Study

Maps and aerial photographs of the site and surrounding area, including existing habitats, were assessed. A search for statutory and non-statutory conservation designated sites for bats within 10km was undertaken using NRW Geographic Information System (GIS) data. A 2km search was undertaken for all other statutory and non-statutory conservation designated sites.

A local planning portal search was undertaken. This involved looking for other sites, within the same postcode area, which have previously had bat surveys submitted as a part of their planning applications.

2.2. Field Study

2.2.1. Daytime Internal and External Inspection

A systematic search of the exterior and interior of the former library was undertaken, looking for features that bats could use for entering/exiting and roosting⁹. In addition, a search was made for the presence of bats or evidence of bat use, such as droppings, feeding remains, urine staining, scratch marks and the remains of dead bats. The survey was undertaken on 8th June 2021 by Ffion Jones¹⁰ and Paul Hudson¹¹ MCIEEM (NRW Licence Number: S088190/1).

A high-powered torch (Clulite), an endoscope (Ridgid Micro CA-300) binoculars and a ladder were available for use, as appropriate during the survey.

2.2.2. Assessment of Bat Roost Suitability

The value of the site for bats (and any potential roost sites therein) was assessed, in accordance with Table 4.1 of the Bat Surveys for Professional Ecologists (Collins, 2016) (see Appendix 2A). The assessment was based on the relative abundance and quality of potential roost sites, and the habitat features within both the site and the surrounding landscape suitable for roosting, foraging and commuting bats.

⁹ Bats may utilise gaps 8mm by 20mm (Bat Conservation Trust, Cluster-flies leaflet).

¹⁰ Ffion graduated with a degree in Ecology and Conservation from the University of Exeter during which she studied modules on biodiversity, ecological consultancy, and conservation. She is an Assistant Ecologist with Acer Ecology working and has two seasons experience of bat survey work. She is listed as an accredited agent on Paul Hudson's bat licence (S088190/1) and has undergone training with Acer Ecology in basic bat ecology and bat survey techniques (including preliminary roost assessments and dusk emergence/dawn re-entry surveys). Further details of her qualifications and experience can be found at <https://www.linkedin.com/in/ffion-jones-17ab63197>.

¹¹ Paul graduated with a degree in Environmental Biology from Reading University and a Postgraduate Diploma in Conservation Management from the University of East Anglia. He has worked within ecological consultancy since 2000 and has undertaken bat work since 2001. He holds licences to disturb bats in both Wales (S088190/1 valid until June 2022) and England (2018-36707-CLS-CLS valid until 2028). Further details of his qualifications and experience can be found at <http://linkd.in/19aGTf4>.

2.2.3. Dusk Emergence Survey

The evening dusk emergence survey commenced 25 minutes prior to sunset, and continued until 90 minutes after sunset. Ffion Jones conducted the dusk emergence survey on 3rd August 2021 (See Appendix 4 for details of surveyor experience). The surveyor was equipped Elekon Batlogger M bat detectors. The surveyor was positioned in a position where all potential roosting features could be observed to detect any bats emerging from, or re-entering, the former library. Bat activity near the former library was recorded to help ascertain flight lines.

In accordance with Section 2.6.1 of the Bat Conservation Trust's Bat Surveys for Professional Ecologists (Collins, 2016) surveys were undertaken during nights with temperatures above 10°C at sunset and during mornings where the previous sunset temperature was above 10°C. The survey was also undertaken in the absence of rain and strong wind (5.4 m/s or greater, which is equivalent to 13 mph or Beaufort 4).

2.2.4. Survey for Nesting Birds

A visual search was undertaken for active bird nests, as well as any signs which might indicate either past or current nesting, such as guano, singing birds, birds carrying nesting material, food items, faecal sacs and calling chicks.

2.2.5. Constraints

General Temporal Constraints

An ecological survey can only identify what is present on site at the time it is conducted. However, habitat usage by species can change over time.

Data Search

A Local Records Centre (LRC) data search was not undertaken due to the low impact and small-scale nature of the development. Current proposals suggest no land will be lost or linear features severed. The overall impact on biodiversity is likely to be localised and of low significance. It is very unlikely that the development will have any impact outside the footprint of the works. The data search results are considered unlikely to impact the decision-making process, and there is limited potential for key information to have been missed.

This approach is consistent with CIEEM's Guidelines for Accessing and Using Biodiversity Data (2020), which states that in low impact/small-scale scenarios, such as an extension to a residential property, loft conversions (full or partial), a LRC search may not be required.

3. Results

3.1. Desk Study

3.1.1. Bat Roosts Reported in Planning Applications Within the Same Postcode

The planning portal search returned no bat roost records within the same postcode area as the proposed development.

3.1.2. Protected Sites

The location of protected sites is shown in Plan 2: Protected Sites.

Statutory Sites Which Are Fully or Partially Designated for Bats (Special Areas of Conservation (SACs)) or Sites of Special Scientific Interest (SSSIs) Within 10km

No SACs that have been specially designated for bats lie within 10km of the former library.

Non-statutory Protected Sites

Sites of Importance for Nature Conservation (SINCs)

There are 16 SINCs within 2km, the nearest of which is Troed-y-Rhiw to the east of the former library. These sites are rich in wildlife and are considered important for their value for local biodiversity.

Ancient Woodland Sites

There are 42 areas of Ancient Semi-Natural Woodland (ASNW)¹², 13 Restored Ancient Woodland Sites (RAWS)¹³, five Plantations on Ancient Woodland Sites (PAWS)¹⁴, and three Ancient Woodland Sites of Unknown Category¹⁵, located within 2km of the site.

The nearest area of ancient woodland is an unnamed area of ASNW located 0.1km to the east of the site.

Protected Sites Summary

Given the small scale and localised nature of the proposed development, as well as the limited scope for impacts outside of the footprint of the proposed works, no adverse impacts to the protected sites are likely to occur. These sites are not mentioned further in this report.

¹² Ancient Semi-Natural Woodland (ASNW) – broadleaf woodlands comprising mainly native tree and shrub species which are believed to have been in existence for over 400 years.

¹³ Restored Ancient Woodland Sites (RAWS) – woodlands which are predominately broadleaved now and are believed to have been continually wooded for over 400 years. These woodlands will have gone through a phase when canopy cover was more than 50% non-native conifer tree species and now have a canopy cover of more than 50 percent broadleaf.

¹⁴ Plantation on Ancient Woodland Sites (PAWS) – sites which are believed to have been continuously wooded for over 400 years and currently have a canopy cover of more than 50 percent non-native conifer tree species.

¹⁵ Ancient Woodland Site of Unknown Category (AWSU) – woodlands which may be ASNW, RAWS or PAWS. These areas are predominantly in transition and existing tree cover is described as 'shrubs', 'young trees', 'felled' or 'ground prepared for planting'.

3.2. Field Study

3.2.1. Ecological Context of Site

Lighting

The site is assessed as being within Zone E3: Suburban lighting zone, with medium district brightness.

(Institute of Lighting Professionals, 2012).

Several streetlights are present on the road that the former library is situated on which generate extensive artificial lighting, somewhat decreasing the quality of foraging and commuting bat habitat¹⁶.

Site and Surrounding Habitats

The habitats surrounding the former library include linked back gardens of the residential properties which provide good ecological connectivity to the surrounding woodland areas. Though not completely continuous, these habitats act as an ecological corridor which may utilise for foraging and commute along to reach the wider landscape. There are numerous areas of woodland in close proximity where bats could forage including an unnamed area of ASNW to the east. As a result, the site provides moderate-quality bat foraging and commuting habitat.

The majority of the wider landscape, however, is urban in nature, thus limiting the overall value of the site.

3.2.2. Building Description from the Perspective of Bat Habitat

The table below summarises the key features of the former library.

Table 1: Key Features of Former library

Building Type	The former library is a two-storey derelict building which has not been used for a number of years (Photos 1-4).
Roof	The roof is pitched with a single subsidiary pitch on its southern elevation above the entrance. It is constructed from slate with clay ridge tiles (Photo 5). The roof is in good condition with no apparent raised, slipped or broken tiles.
Lead Flashing	There is lead flashing at the valley between the two pitches, which is well-sealed (Photo 5).
Soffits, Fascias and Bargeboards	The soffit boxes are of uPVC design and are in good condition, however there are several small gaps between the soffit and the external wall on the northern, southern and western elevations (Photos 6-8).
External Walls	The external walls are constructed from red brick with a concrete render, and are in good condition with no cracks or crevices.
Windows	The windows are framed with uPVC and are in good condition, however there are small gaps in the brickwork around the windows on the northern elevation (Photos 9-10).
Roof Void	There is no current roof void in the former library and internally it has been gutted (Photo 11). The roof is lined with timber beams and trusses in a typical A-frame design, and is lined with plastic sheeting (Photo 12).

¹⁶ Lighting can impact on bats' roosting sites, commuting routes and foraging areas.

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Photos Showing the Former library and its Features

Photo 1: Northern elevation



Photo 2: Western elevation



Photo 3: Southern elevation



Photo 4: Eastern elevation



Photo 5: Roof tiles and lead flashing



Photo 6: Gap behind uPVC soffit



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Photo 7: Gap in soffit box on north western corner



Photo 8: Gap between soffit and external wall on western elevation



Photo 9: Gaps in Soffit on western gable end with visible apex



Photo 10: Gaps above windows on the northern elevation



Photo 11: Gap around windows on the northern elevation

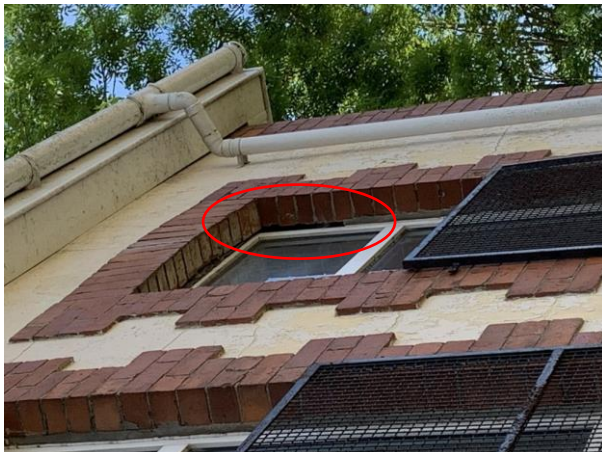


Photo 12: Gutted interior of former library



Photo 13: Timber beams and plastic lining



3.2.3. Potential Bat Access Points and Bat Roosting Locations

Potential Access Points for Bats in Former library

Bats could potentially gain access into the former library via the gaps between the soffit boxes and external walls, however none of the roof tiles or soffit boxes on the northern, eastern, southern and western elevations are proposed to be impacted as part of the works.

Potential Roosting Sites for Bats

The following potential roost sites were recorded:

- Within the gaps between the soffit box and external wall (see Photos 6-8); and
- Within the crevices in the brickwork around the windows on the northern elevation (see Photos 9-10).

3.2.4. Dusk Emergence Survey

Table 2: Summary of conditions during dawn re-entry survey

Date	03/08/2021
Sunset/Sunrise Time	21:00
Start Time	20:35
Finish Time	22:30
Sunset Temperature	15°C
Rain	None
Wind¹⁷	1
Cloud Cover	2/8 oktas

¹⁷ Estimated on site using the Beaufort scale.

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Table 3: Summary of dusk emergence survey results

Emergences/ Re-entries	No bats emerged from or interacted closely with the former library.
Important Commuting/ Foraging Routes	No noteworthy commuting routes were identified.
Bat Activity¹⁸	Overall, moderate levels of bat activity were recorded. Common pipistrelle (<i>Pipistrellus pipistrellus</i>) was regularly recorded throughout the survey. Lower levels of activity of soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) were recorded.
Bat Social Calls	Common pipistrelle Type D. social calls were recorded. This is an advertisement call made by males to attract females, indicating mating.

3.2.5. Nesting Bird Survey

No signs of recent nests were found within or on the exterior of the former library.

¹⁸ Activity thresholds have been quantified using personal judgement according to past experience of surveying similar sites.

4. Evaluation

4.1. Summary of Preliminary Roost Assessment

The preliminary roost assessment and dusk emergence survey found no evidence of bats roosting within the former library.

4.2. Suitability of Summer Roosts

The former library was assessed during the initial preliminary roost assessment survey as having low suitability for use by crevice-dwelling bats; low suitability for use by roof-void dwelling bats; and negligible suitability for use by direct access species (horseshoe species). Full justification of the assessment can be found in the Appendix 2B. This assessment was used to determine the number of dawn re-entry and emergence surveys required (see Appendix 2A).

4.3. Potential Winter Roosts

The gaps around the windows provide features which are suitable for non-classic over-wintering sites. The north-facing nature of these features increases the likelihood of such use. However, the presence of hibernating bats is considered unlikely due to the lack of direct evidence of bats found using the former library during the preliminary roost inspection and dusk emergence survey¹⁹.

4.4. Birds – Interpretation of Nesting Bird Survey

No evidence of past or current nesting by birds was noted during the preliminary roost assessment or the dusk emergence surveys, either within or on the exterior of the former library.

¹⁹ There is limited research on where pipistrelle bats hibernate, but current evidence suggests that they may hibernate adjacent to their breeding roosts in secure locations such as cavity walls that have relatively stable temperatures. Other individuals disperse to roost in small numbers in more exposed locations such as around window frames. In exposed locations pipistrelle bats typically hibernate as one or two individuals. Often there are often no obvious external signs of their presence (JNCC, 2004). Because of the highly exposed location of hibernation sites used by some individuals, it is therefore very difficult to completely rule out hibernation use by this species in almost any building that has some very shallow crevices, openings or gaps.

5. Impact Assessment

5.1. Potential Impacts of Development on Bats

Based on the conclusion that bats are unlikely to be roosting within the former library, no negative direct or indirect impacts on bats are anticipated.

5.2. Potential Impacts of Development on Birds

There are anticipated to be no potential direct impacts due to the absence of evidence of nesting birds in the former library.

6. Required Actions

6.1. Further Work and Licensing Requirements

No further survey work is considered necessary. A protected species licence is not required as the survey indicates a likely absence of roosting bats in the former library.

6.2. Precautionary Measures

No evidence of any use by roosting bats was recorded on site and it is therefore highly unlikely that bats or their roosts will be affected by the works. No precautionary timing conditions on works are required. However, it is not possible to rule out bat use entirely, and there is also a risk of an offence being committed if active birds' nests are present. The following recommendations are made to minimise risks to bats and birds:

- It will be clearly understood, and contractors made aware that in the event of any bats being found, the contractor must halt works (if bats are encountered, the bat will be carefully covered over again). Appropriate advice will be obtained from a suitably qualified bat consultant or Natural Resources Wales and, if necessary, a bat development licence obtained before work can resume;
- If any active bird nests are found these will be protected, along with an appropriate buffer zone of 5-10m, until the nesting is complete, and the young have fledged²⁰;
- Contractors will check for the possible presence of bats on the undersides of roofing tiles as they are lifted off. This is especially important at the outset of the works, since once the works have started, the disturbance is likely to drive any bats which are present away voluntarily; and
- The services of an appropriately qualified and licensed ecological consultant will be available on an 'on-call' basis at all stages of the works to deal with any unexpected encounters with bats or nesting birds. Contact details of such will be held on site. Acer Ecology Ltd. could be retained to provide this support.

6.3. Ecological Enhancement for Bats

The Environment (Wales) Act 2016, Planning Policy Wales (Edition 11, January 2021), TAN 5 *Nature Conservation and Planning* (2009) and Merthyr Tydfil Supplementary Planning Guidance Note 5: Nature and Development (2015)²¹ stipulate that development projects minimise ecological damage and contain elements of ecological enhancement.

Ecological enhancements measures could be provided within the proposal and could include the retention of any unused areas of roof void for use by roosting bats with suitable access points. Alternatively, fascias, soffits and gutter-plates etc. could be left with small gaps beneath to allow access by crevice-dwelling bats

²⁰ Some bird species, especially raptors and owls remain dependent upon the nesting site after fledging and so depending upon the species the nest site may need to be protected for a period of time after fledging.

²¹ <https://www.merthyr.gov.uk/media/1594/spg-5-nature-and-development.pdf>

behind them²², and/or purpose-built bat roosting boxes could be installed, either on the exterior of the former library or incorporated directly into the structure of the walls.

One Schwegler 1FR bat tube²³ or similar could be incorporated into the exterior wall of the former library. The bat tube could be recessed into the walls and lying flush with the surrounding wall. It could then be rendered with care to ensure that the entrance slot is left exposed or painted with breathable paint if required. If installed, the tube should be positioned at least 0.5m below the eaves or gable apex to prevent predation by domestic cats. It is also recommended that where practical, the tube is not positioned above windows or doors. In addition, ideally the bat tube should be installed in an unlit location close to connective features to allow bats undisrupted dispersal to local foraging habitat.

6.4. Longevity of Report

Survey data should ideally be from the last survey season before a planning or licence application is submitted, although the length that survey data remain valid should be decided on a case-by-case basis and is dependent upon several factors²⁴ (Collins, 2016). If development works do not begin within eighteen months to two years of the date of this report, an updated survey may be required in accordance with guidance in BS 42020:2013²⁵ and CIEEM (2019), to determine if conditions and bat use has changed since described in the current report.

²² This approach will only be acceptable if breathable membrane will not be installed within the building or the fascia, soffits etc. or the fascias, soffits etc. will be installed in a way where there is no potential for bats to gain access to the breathable membrane.

²³ A variety of bat boxes, tubes and bricks suitable for buildings and are available from Schwegler (<http://www.schwegler-nature.com>) and Ibstock (<http://www.ibstock.com/sustainability-ecozone.asp>).

²⁴ The factors identified are as follows: Were the original surveys carried out according to good practice guidelines?; Were the original surveys constrained in any way?; Do the results of the original surveys support the original conclusions and are these still relevant?; Has the nature of the site or the surrounding area changed since the original surveys were undertaken; and are additional surveys likely to provide information that is material to a decision, the design of mitigation measures, or specific advice relating to a proposed activity.

²⁵ As set out in Section 6.2.1, Point 7 which states that ecological information should not normally be more than two/three years old, or as stipulated in good practice guidance).

7. References

Anonymous (2007) *Guidance document on the strict protection of animal species of Community interest under the Habitats Directive 92/43/EEC*. Final version, February 2007.

BSI (2013) *BS 42020:2013 Biodiversity – Code of practice for planning and development*. British Standards Institution, London.

CIEEM (2019) *Advice Note on the Lifespan of Ecological Reports and Surveys* <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

CIEEM (2020) *Guidelines for Accessing, Using and Sharing Biodiversity data in the UK*. <https://cieem.net/wp-content/uploads/2016/03/Guidelines-for-Accessing-and-Using-Biodiversity-Data-March-2020.pdf>

Collins, J (ed) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn)*. The Bat Conservation Trust, London.

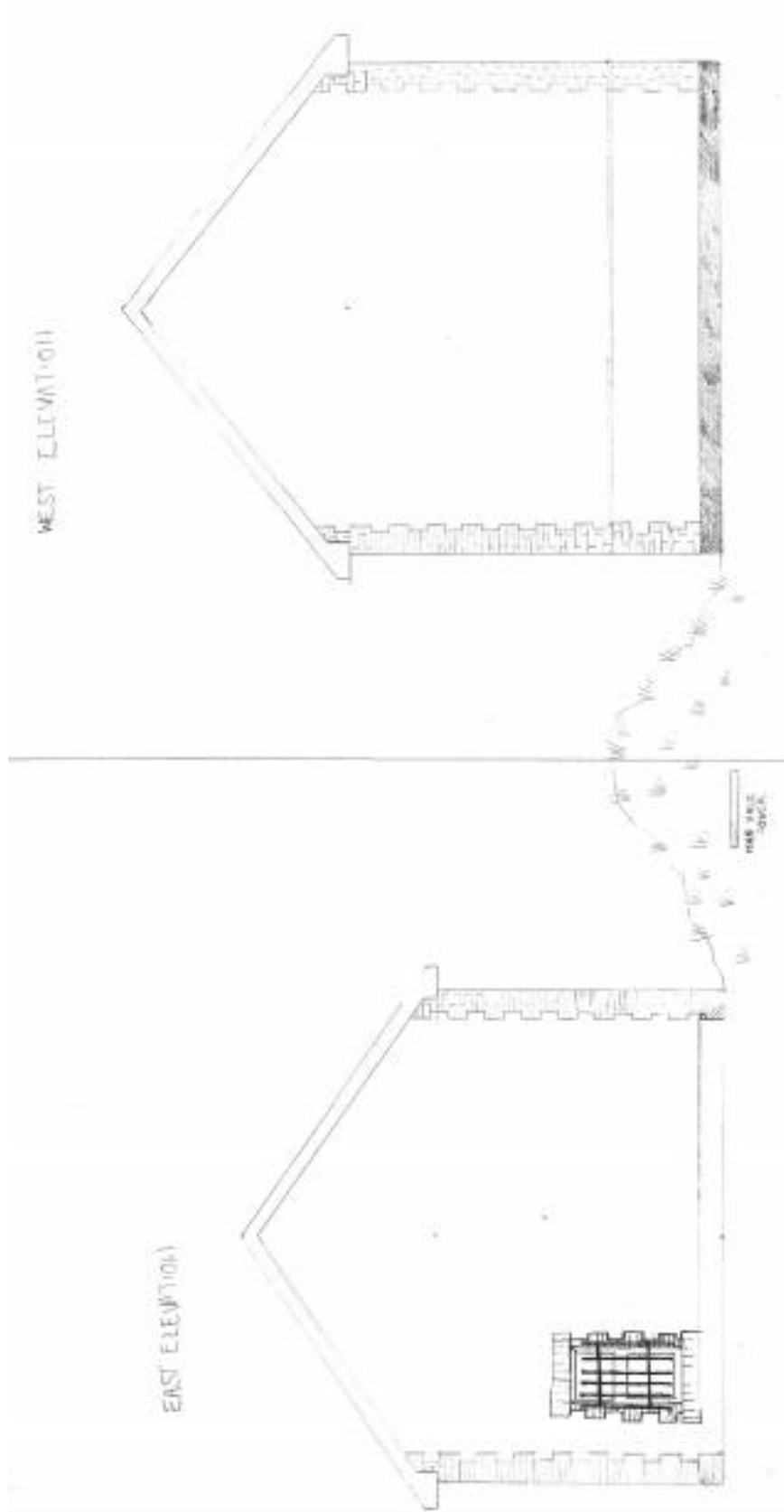
Eaton, M, Aebischer, N, Brown, A, Hearn, R Lock, L, Musgrove, A, Stroud, D and Gregory, R (2014) *Birds of Conservation Concern 4: the population status of birds in the UK, Channel Islands and Isle of Man*. *British Birds* 108. December 2015. 708-746. Available online at <http://bit.ly/2h23DqV>.

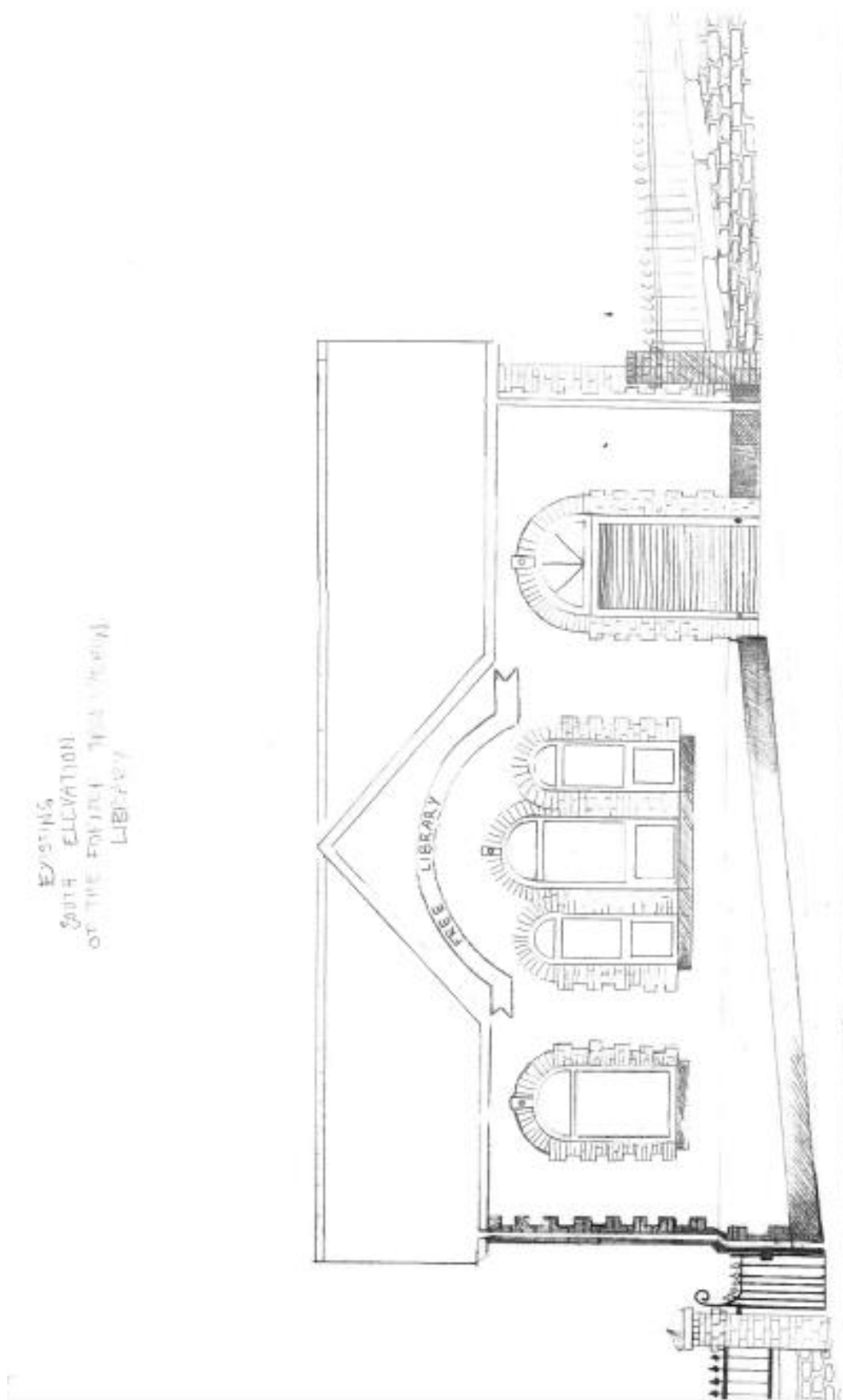
Institute of Lighting Professionals (2012) *Guidance for The Reduction of Obtrusive Light*.

Mitchell-Jones, A.J, & McLeish, A.P. Ed., (2004) *Bat Workers' Manual (3rd Edition)*. Joint Nature Conservation Committee, Peterborough.

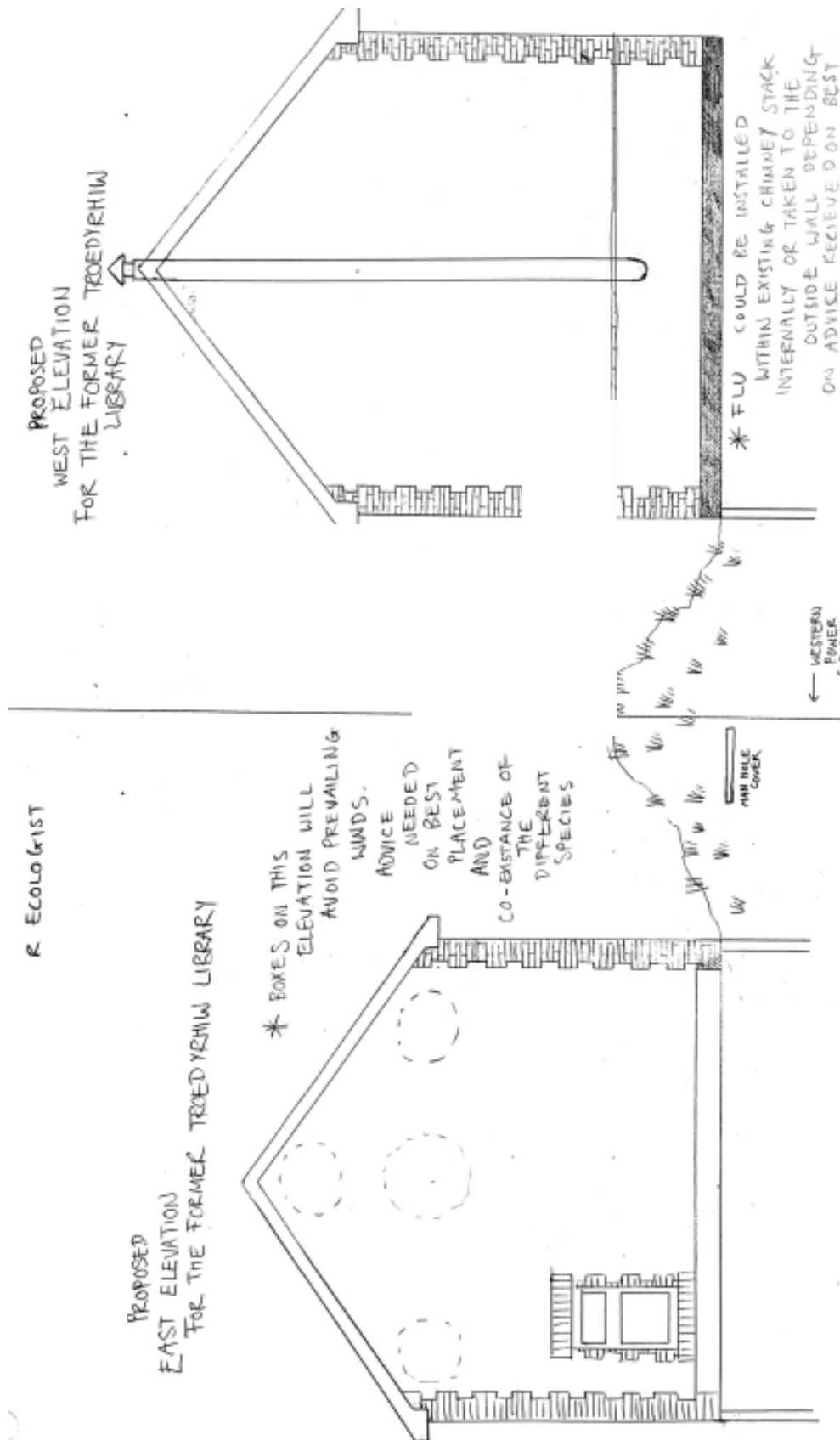
Mitchell-Jones, A.J. (2004) *Bat Mitigation Guidelines*. Natural England, Peterborough.

Drawing 1: Existing Site Plans





Drawing 2: Proposed Development



Plan 1: Location Plan



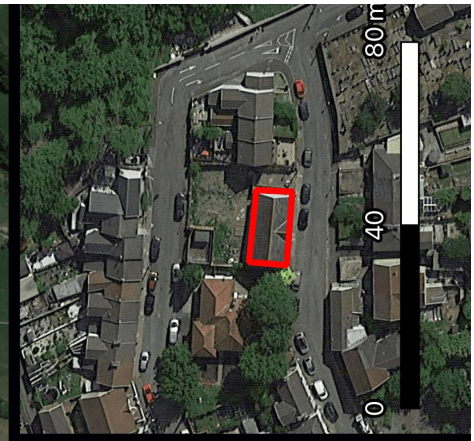
**Former Troedyrhiw Library
Troedyrhiw**



Location Plan

 **Former Troedyrhiw Library
Troedyrhiw**

© QGIS and Google Maps and Natural Resource
Wales data 2021



Plan 3: Dusk Emergence Survey Results (03/08/2021)



Appendix 1: Bat Ecology and Legislation Protecting Bats and Their Roosts

Bat Ecology

There are 17 known breeding species of bat found in the UK, with additional species recorded as migrants or vagrants. All of them are small, nocturnal, flying, insectivorous mammals that are under conservation threat, and many having undergone massive population declines over the last century. Some species, such as common and soprano pipistrelle are relatively common and widespread in the UK, while others, such as greater horseshoe bats (*Rhinolophus ferrumequinum*), have an extremely restricted distribution.

Most bats will use a variety of roosts of different types throughout the year. The winter hibernation sites typically have cool, humid conditions with a stable microclimate and low levels of disturbance. Most British bats hibernate in caves or artificial structures that fulfil these requirements, such as mines, tunnels and cellars. Bats emerge from hibernation around late March or early April and move into transition or intermediary roosts. Around early May, female bats gather in colonies to form summer or maternity roosts, and it is here where they will give birth between late May and early July. A colony may consist of many individuals (sometimes hundreds of bats) of mixed age and sex. Roosts occur in a variety of habitat types, including tree-holes, caves, buildings and other secure crevices or internal spaces with appropriate stable temperatures and humidity. Bats may change roost locations many times during a year, and colonies may split up and reform during this period. Males occupy solitary roosts in autumn, to which they attract females for mating.

Legislation

All British bat species and any place used for shelter or protection, or a breeding site or resting place (their roosts) are fully protected under the amended Wildlife and Countryside Act 1981 through inclusion in Schedule 5. The roosts are protected irrespective of whether bats are present at the time. All bats fully protected under the Wildlife and Countryside Act 1981 (as amended) and Conservation of Habitats and Species (Amendment) (EU Exit) [‘CHSAEU’] Regulations 2019. These pieces of legislation make it illegal to deliberately or recklessly:

- kill, injure or capture bats;
- disturb bats;
- damage, destroy, or obstruct access to bat roosts (including sites that are currently unoccupied);
- possess or transport a bat or any part of a bat unless acquired legally; or
- sell, barter or exchange bats or parts of bats.

Disturbance is defined as that which is likely to impair bats ability:

- to survive, to breed or reproduce, or to rear or nurture their young;
- to hibernate or migrate; or
- to significantly affect the local distribution or abundance of the species to which they belong.

Habitats Regulations Licensing

If a European Protected Species will be affected by a development, Natural Resources Wales (NRW) can issue licences under the Habitats Regulations to permit otherwise prohibited acts. Licences for certain activities can be granted providing “three tests” are satisfied, that is:

1. the purposes of “preserving public health or safety, or for reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment”;
2. there must be “no satisfactory alternative”; and,
3. the derogation is “not detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range”.

Where Planning regulations apply, NRW will only issue a licence after planning consent has been granted. The licence application will require the production of a detailed method statement, which sets out the activities to be carried out under the licence to minimise the risk of bats being harmed during construction works and ensure that bats will be conserved during the development of the site. This will need to detail the mitigation proposed (such as the replacement or compensation roost), the timescale and schedule of works, the number, size and locations of bat access points to be provided, the type of materials to be used (roofing material, roof lining, fascias, soffits and bargeboards etc.), lighting proposals, action to be taken in the event bats are found during works and a post-development monitoring programme. The method statement will need to be accompanied by scaled plans and maps detailing the bat mitigation features. A cross-section of the access points and roost space is often required. The method statement must ensure that provision is made for new or continued roosting opportunities after the completion of development works. In some instances, a method statement is requested by the Local Planning Authority or Natural Resources Wales before the planning application is determined.

Planning Policy Wales

Section 6.4 Paragraph 6.4.5 of Planning Policy Wales Edition 11 (2021) that focuses on Biodiversity and Ecological Networks, Section 6 of The Environment (Wales) Act 2016²⁶ that details the requirement for enhanced biodiversity and resilience of ecosystems, TAN 5 and Section 40(1) of the Natural Environment and Rural Communities Act (NERC) 2006 all encourage developments in Wales to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally.

Part 1, Section 7 of the Environment (Wales) Act 2016 provides a list of the ‘*living organisms of principal importance for maintaining and enhancing biodiversity in relation to Wales*’. This includes seven bat species (soprano pipistrelle, barbastelle (*Barbastella barbastellus*), Bechstein’s (*Myotis bechsteini*), noctule (*Nyctalus noctula*), brown long-eared (*Plecotus auritus*), lesser horseshoe (*Rhinolophus hipposideros*) and greater horseshoe bats).

²⁶ <http://www.legislation.gov.uk/anaw/2016/3/contents>

Appendix 2A: Guidelines for Assessing Potential Bat Roosting Suitability and Determining Required Number of Dusk/Dawn Surveys

Suitability	Description of Roosting Habitat	Minimum Number of Dusk/Dawn Surveys Required ²⁷
Negligible	Negligible habitat features on site likely to be used by roosting bats.	None.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection appropriate conditions ²⁸ and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity) or hibernation ²⁹ .	One survey visit. One dusk emergence or dawn re-entry survey (Survey period from May to August) (Collins 2016).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status ³⁰ (with respect to roost type only) the assessments in this table are made irrespective of conservation status, which is established after presence is confirmed.	Two separate survey visits. One dusk emergence and a separate dawn re-entry survey ³¹ . Surveys should be undertaken from May to September, with at least one of the survey between May and August (Collins 2016).
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for long periods of time due to their size, shelter, protection, conditions and surrounding habitat.	Three separate survey visits. At least one dusk emergence and a separate dawn re-entry survey. The third visit could be either dusk or dawn. Surveys should be undertaken from May to September, with at least two of the surveys from May to August (Collins 2016).
Confirmed Roost	Evidence of bats or use of bats found.	Three separate surveys recommended to characterise the roost. If no evidence of bat roosting is detected during the dusk and dawn surveys, DNA analysis of the droppings may be required.

²⁷ Adapted from Tables 7.1 and 7.3 of the Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2016).

²⁸ For example, in terms of temperature, humidity, height above ground levels, light levels or levels of disturbance.

²⁹ Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments (Korsten *et al.*, 2015). This phenomenon requires some research in the UK, but ecologists should be aware of the potential for large numbers of this species to be present during the autumn and winter in large buildings in highly urbanized environments.

³⁰ 'High roost status' is not defined within Collins, 2016. Acer Ecology Ltd. interpret maternity, hibernation, swarming sites, mating sites, and satellite roosts as being of 'high roost status' and exclude day roosts, night roosts, feeding roosts, transitional/occasional roosts from this definition. Pre-maternity/collecting roosts are not included within Collins, 2016 and will be assessed on an individual basis.

³¹ Multiple surveys should be spread out to sample as much of the survey period as possible. It is recommended that surveys are spaced at least two weeks apart, preferably more. A dawn survey immediately after a dusk survey is considered only one visit.

Appendix 2B: Justification of Assessment of Bat Roost

The former library is assessed as having:

- Low suitability for use by crevice-dwelling bats (*Pipistrellus* species and smaller *Myotis* species such as Brandt's (*Myotis brandtii*) and whiskered bats (*Myotis mystacinus*)), due to the gaps within the brickwork around the windows and the gaps between the soffit boxes and external walls;
- Low suitability for use by roof-void dwelling bats³² (long-eared species and large *Myotis* bats, such as Natterer's bat (*Myotis nattereri*) and serotine bats (*Eptesicus serotinus*)) due to the gaps between the soffits and external walls which may provide access, despite being sub-optimal. However, droppings for these species usually persist and the absence of such droppings and increased disturbance suggest that these species are not roosting within the interior of the former library; and
- Negligible suitability for use by direct-access species requiring a large access point and large roost space (lesser horseshoe and greater horseshoe bats) due to the lack of suitably large access points for these species.

³² It should be noted that, in non-maternity roosts, long-eared bats can make use of crevice features without gaining access into a roof void.

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Appendix 3: Guidelines for Assessing Bat Habitat Suitability

Suitability	Commuting and Foraging Habitat
Negligible	Negligible habitat features on-site likely to be used by commuting and foraging bats.
Low	<u>Commuting Habitat</u> Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or un-vegetated stream, but isolated, i.e. not very well connected to the surrounding landscape. <u>Foraging Habitat</u> Suitable but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	<u>Commuting Habitat</u> Continuous habitat connected to the wider landscape that could be used by bats for commuting, such as lines of trees and scrub or linked back gardens. <u>Foraging Habitat</u> Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	<u>Commuting Habitat</u> Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge. <u>Foraging Habitat</u> High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. <u>Proximity to Known Bat Roosts</u> The site is close to and connected to known roosts.

Appendix 4: Surveyor Experience

Ffion Jones – Ffion graduated with a degree in Conservation and Ecology at the University of Exeter. As part of her degree, she undertook an Ecological Consultancy module where she learnt about bat ecology, survey methods and bat call analysis. She has undertaken training with Acer Ecology, including bat ecology, emergence/re-entry surveys and transect surveys and is in her third season of conducting bat surveys. Further details of her qualifications and experience can be found at <https://www.linkedin.com/in/ffion-jones-17ab63197>.