

HAWKESWOOD ECOLOGY

Specialists in Ecological Survey and Assessment

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PRELIMINARY ROOST ASSESSMENT AND OBSERVATION SURVEY, GERAINT HOUSE, MARGAM.

On behalf of

TAI TARIAN LTD

June 2020

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All habitat and protected species surveys present a ‘snapshot’ of conditions existing and species present, or considered having potential to be present, at the time of survey. Many species are mobile and distributions can vary across time. Results and findings presented in this report should be considered with these factors in mind.

Protected species surveys are recognised as having a ‘shelf life’ of two years maximum. Surveys older than this are unlikely to be accepted by a Local Planning Authority or Natural Resources Wales as viable documentation.

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SUMMARY

Hawkeswood Ecology was instructed to carry out a daytime Preliminary Bat Roost Assessment (PRA) at Geraint House, Margam. The building is a two-storey structure housing a number of flats, it has a double pitched roof based on a 'Finlock' guttering system which effectively blocks access to the wall tops. It is of brick/block cavity construction and mostly rendered. It is proposed to carry out works to the building including removal of the Finlock system.

The building is situated in the established urban development of Margam and is immediately adjacent to Groeswen playing fields with a number of green areas locally and Margam Park within a kilometre to the east. The Finlock guttering system seals the wall tops and no access points were apparent; the roof was in good condition and the building generally was in fair condition. There are three chimneys and the flashing offered small gaps on two of them with limited potential for bat access. As a result of this, the building was considered to be of low potential to support roosting bats and a single observation was recommended in accordance with current guidance. The building was also assessed for breeding birds and no evidence found either at the PRA stage or during the observation survey.

The PRA found no evidence of bats with only limited potential for bats to access gaps in the chimney flashing although no internal evidence such as droppings was found in these locations. The observation recorded a small number of bats passes with only common pipistrelle and a 'Pip 50' noted foraging around the house gardens and locally and a noctule flying over on two occasions. There was no activity associated Geraint House itself.

No breeding bird species associated with the building were noted during the Site visits.

It is concluded that Geraint House does not currently support roosting bats and shows no signs of having done so. However, as gaps are present around the chimney flashing recommendations for safe working practices are made within the report.

The conclusions of this report are considered valid for two years from the survey dates noted in Section 1 of the report.

1 INTRODUCTION

- 1.1 Hawkeswood Ecology was instructed by Tai Tarian Ltd to undertake a Preliminary Bat Roost Assessment (PRA) and an observation survey at Geraint House, Knights Road, Margam, SA13 2DY, in relation to the potential for the building to support roosting bats. The building stands in an established urban development adjacent to open green space, and within a kilometre of Margam Park and approximately 140 metres east of a main railway line. It is located at Grid ref SS 78219 87442.
- 1.2 Geraint House is a two-storey structure housing flats dating from the 1960's. It has a double pitch roof sitting on a Finlock concrete guttering system that requires replacing; the roof is tile covered and in good condition with well-sealed ridges and no obvious crevices, broken tiles or gaps. It is brick/block built and partially rendered; all walls and render appear in fair condition.
- 1.3 The objectives of the survey were to:
- To establish whether the building is currently used by bats;
 - To assess the potential impacts on bats of the proposed works;
 - To provide mitigation proposals in the case of bats being found.
- 1.4 The PRA was carried out on 11th February 2020. A single dusk emergence observation was carried out on 2nd June 2020. Any evidence of breeding birds using the building was also looked for during the survey period.

2. METHODOLOGY

Desk Top Study

- 2.1 The South East Wales Biological Records Centre (SEWBReC) were asked to provide records of bats and roof nesting birds within search buffers of 2 kilometres and 150 metres respectively.

Field Survey

- 2.2 The study methodology followed accepted guidelines set out in the Bat Conservation Trust documents '*Bat Surveys for Professional Ecologists, Good Practice Guidelines*' 2016.
- 2.3 The principal aim of the daytime inspection was to survey the main structures of the building for the presence of, and potential to, support roosting bats. Firstly, an external examination was made of the design and structure of the building to assess the suitability for use by bats and for potential access points. Following this an internal search of the building was made. Evidence such as bat droppings (faeces) or urine staining on doors, walls or other surfaces was looked for.
- 2.4 The daytime inspection was carried out with the aid of close focusing binoculars, an endoscope, ladders and a 1,000,000 candlepower spot lamp.

- 2.5 Observations involved three observers and covered all relevant aspects of the buildings. Machines used were Echo Meter 3 Real Time Expansion units. Locations of the observers are shown in Figure 1.
- 2.6 Recordings were made continuously on the EM3 machines. The recordings were analysed using AnalookW and Batsound software, by use of which it is possible to separate most species present from the sonograms produced.

Constraints

- 2.7 No constraints to the survey were noted.

3. SURVEY TEAM EXPERIENCE

- 3.1 The survey leader and report author is Eric Hawkeswood. Eric has been an active member of the Brecknock Bat Group since 1999 and been involved in a number of long running surveys within the county. He is a Natural Resource Wales (NRW) and Natural England licensed bat worker (nos. S085546-1, 2018 and 2017-28420-CLS-CLS respectively) and has extensive experience of roost inspections and emergence work. He has been a professional in the nature conservation field for thirty years formerly working as Reserves Manager and Conservation Officer at Gwent Wildlife Trust and Woodland Manager for the Ruperra Conservation Trust. Eric has worked as an Ecological Consultant as joint proprietor of Hawkeswood Ecology since 2001.
- 3.2 Assistant surveyors on the evening observation were Emma Adamson and Liam Kelly. Emma has worked with Hawkeswood Ecology for over 12 years and Liam since 2012. Both have extensive experience of emergence/re-entry surveys.

4 DESKTOP STUDY FINDINGS

- 4.1 SEWBRc reported 17 records involving three species of bat and one unidentified species record. The nearest record is of an unidentified bat from a house 230 metres from the Site.
- 4.2 All other records relate to common and soprano pipistrelle and noctule bat. There are four other records from within a distance of 1 kilometre from the Site; these are of common and soprano pipistrelle and noctule of a noctule bats between approximately 400 and 700 metres from the Site and associated with the local steel works to the north west and new developments to the south.
- 4.3 Further records of common and soprano pipistrelle and one of noctule bat come from between 1 and 2 kilometres from the Site, the majority of records associated with developments at the south of the search area.
- 4.4 Seven records of roof nesting birds involving seven species of bird are reported from the 150 metre search buffer. Of relevance to Geraint House are starling and swift.

- 4.5 The Site does not fall within 10 kilometres of a Special Area of Conservation (SAC) or Sites of Special Scientific Interest (SSSI) notified for the presence of bats.
- 4.6 SEWBReC data is confidential and cannot be released into the public domain without prior permission in writing from SEWBReC. Hawkeswood Ecology holds the data on the client's behalf for one year (in accordance with conditions) in case of further query.
- 4.7 Hawkeswood Ecology hold records of a number of species from areas adjacent to the search buffer area including whiskered, Nathusius pipistrelle, lesser horseshoe, Daubenton's bats as well as those species reported above.

5 **FIELD SURVEY**

Daytime Inspection

- 5.1 Geraint House is a large two-storey structure with a main east west axis at the northern end and a two-storey annex coming from this to the south. It is brick/block built with a double pitch tile covered roof and the walls are partially rendered. Photographs are given in Appendix 1.
- 5.2 Externally, the building is brick faced and largely rendered with only the eastern gable end fully exposed brick and the northern elevation with exposed brick on the ground floor. The render is worn but in fair condition with no obvious or deep cracks present; the brickwork is in good condition.
- 5.3 The roof is tile covered with two lead lined valleys at the junction of the main axis and annex to the south. The roof covering is in good condition, the ridges are well sealed and there are no missing or broken tiles apparent. The eastern valley has leaked but there was no apparent bat access in this area.
- 5.4 The building has no soffits, a Finlock system replacing these. This is a concrete block system that sits on the walls and fully seals then against access, all wall tops were rendered to them and no gaps were apparent. The gables had verges which were completely sealed where render was present. The third gable with exposed brick did have shallow gaps under the verge but could be seen to be sealed against access to the wall tops.
- 5.5 There are three chimneys on the building, all are in good condition however the flashing at those on the east west axis did show some gaps.
- 5.6 Internally the building is divided into six flats with three on the first floor. There was damage to the ceiling above flat 4 in the eastern end of the main building. Access was possible to all parts of the roof space and Figure 2 shows the loft layout above the flats.
- 5.7 There were essentially three loft areas, all interconnected and all showed slight differences in structure. The roof above flats 4 and 6 shared a similar structure with an essentially open cut roof with occasional 'tie-beams', the loft above flat 5 showed many more tie beams but was again essentially an open cut style roof.

- 5.8 The underfelt is bitumen, but appears to be plastic backed, and is in generally good condition. There is evidence of water damage from the leak in the valley above Flat 4 but no evidence of a hole or suitable bat access point. The lofts are insulated with a mix of rockwool and glass fibre insulation. No holes or access points were apparent, but there were remains of an old nest on the southern gable. This appears to have been prior to repairs and there is no current access to this area for animals.

Surrounding area

- 5.9 The immediate surrounding area is established housing dating from the 1960's and earlier. Immediately to the west of the House is a managed sport area. The mainline railway is approximately 140 metres west of the Site and there are other open spaces locally. Margam Country Park lies around 1 kilometre to the south east.

Evidence and Potential for roosting Bats

- 5.10 The PRA found no direct evidence of bats using the building. There was no visible access to the roof space however there were gaps in the chimney lead flashing. Due to this factor and the presence of a leak a valley the building was considered to be of **Low potential** to support roosting bats. As the proposed works involve the removal of the Finlock gutter system and chimneys and replacement of the roof cover, it was considered that a single observation should be undertaken in line with the accepted guidelines.

Birds

- 5.11 No recent evidence of breeding birds having used the building was noted during the PRA; however, the remains of an old nest were present in the southern gable apex which appeared to pre-date repair works.

Observations

- 5.12 A dusk observation was carried out on 2nd June 2020. The conditions at the time of the observation are detailed below in Table 1:

Table 1: Weather conditions for dusk observations:

Date	Survey type	Times	Weather conditions
2 nd June 2020	Evening emergence	21.10 – 23.00 (sunset 21.25)	22-20°C, ~40% cloud increasing. Dry, good visibility, F1 gusting F2 W breeze.

- 5.13 Activity was limited to small numbers of bats throughout the observation with infrequent foraging of common pipistrelle around the Site and adjacent gardens. Bats were seen to fly to the Site from the other side of the road (where a local resident thought there may be a roost) and from the northern end of the road. Noctule bats overflowed the Site on three occasions. It was particularly noted that streetlights lit up the eastern and northern facing elevations.
- 5.14 The first bat noted was a common pipistrelle at 21.30 which flew to the Site and between Geraint House and the neighbouring property where it foraged around the rear of the

adjacent properties before returning to the grounds of Geraint House. This behaviour was repeated throughout the observation.

- 5.15 At 22.20 a second bat was seen to fly from the other side of the road and was seen foraging around the House and adjacent properties with another, presumably the first, bat. Recordings showed common pipistrelle and ‘pip 50’ calls although the general thoughts are this was also most likely a common pipistrelle following analysis.
- 5.16 No direct bat activity was noted that was associated with the building or that suggested its use for roosting purposes.

6 ECOSYSTEM RESILIENCE

- 6.1 Under the Environment (Wales) Act 2016 Local Planning Authorities (LPA’s) and other public bodies 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. LPA’s are directed to consider the resilience of ecosystems early in the planning process to aid assessment of the impacts of any proposed development upon biodiversity.
- 6.2 The premise for Ecosystem Resilience is laid out in Section 4 of The State of Natural Resources Report, a 2018 document produced by Natural Resources Wales (NRW) on behalf of the Welsh Government. It lays out a framework for assessing ecosystem resilience. However, despite the duty placed on LPA’s, there is no currently agreed format for this assessment.
- 6.3 Section 4 names five attributes that NRW consider ‘building blocks’ of ecosystem resilience, these are:
- Diversity
 - Extent
 - Condition
 - Connectivity
 - Adaptability
- 6.4 These factors are considered below, although none of them are considered ‘standalone’ and all interrelate to some extent. It is also important to note that it is the responsibility of the LPA to assess Ecosystem Resilience and that any Site based report is not able to make judgements on a wider scale. It should also be acknowledged that there is as yet no agreed format to undertake such an assessment.
- Diversity*
- 6.5 The habitats on Site can be placed into two distinct areas, the built landscape of Geraint House and amenity areas which include formally mown grassland and hard-standing areas. Currently the grassland is unmown, most probably due to the current Covid-19

crisis, but this has only served to show the paucity of the habitat which is dominated by Yorkshire fog and few broad-leaved herbs, mainly creeping buttercup.

- 6.6 The works to the Site are relatively limited and largely restricted to existing hard standing areas. It is not considered the proposals will devalue the Site or area in terms of existing habitat and will have no roll-on effect on neighbouring areas, which are gardens and a maintained sports ground.

Extent

- 6.7 The whole Site is less than 0.01Ha, and is mainly dominated by the building and hard standing. Its small size is further impacted upon by the lack of direct connectivity to other habitats.

Condition

- 6.8 The Site is not in good condition for biodiversity. The amenity grassland has been managed by formal mowing and although not cut this season is species poor and typical of many urban grassed areas. The building offers no opportunities for breeding birds and is very limited in relation to roosting bats in its current condition.

Connectivity

- 6.9 The Site is relatively isolated in the urban environment but could be considered to form part of a corridor along the boundary of the sports field. This was evidenced to some extent by the use of the Site and adjacent properties by bats. Although only small number of passes was recorded through the observation, their use of the gardens is likely to become more inclusive of the open areas of the sports grounds as it grew darker.

Adaptability

- 6.10 NRW comments that:
‘Adaptability differs from the other attributes because it is part of the definition of resilience rather than an attribute that supports it. However, its inclusion in the Environment (Wales) Act is important because it emphasises one of the most important features of resilience: dynamism and the ability to adapt to change.’
- 6.11 NRW also comments that *‘Adaptability cannot yet be quantified in an equivalent way to the other attributes and so we have not used it in the assessment of resilience in this State of Natural Resources Review’*. As such this cannot be considered in this report.

7 DISCUSSION AND IMPACT ASSESSMENT

- 7.1 The daytime inspection of the buildings found no direct evidence of bats using the buildings but did find limited potential for them to gain access to the roof via some loose flashing around the chimney. A full and detailed search of the loft space was possible and found no evidence of bats being present in the loft space although a large amount of rat droppings was noted in the southern annex near the gable end.

- 7.2 Geraint House was considered to be in generally good condition although there was water damage that appears to have been associated with the valley on the front elevation, however there was no evidence of bat access being possible in this location. The external roof cover appeared to be in very good condition with no broken tiles or obvious gaps, the ridge was well sealed. There are continuing issues with the Finlock system creating damp issues to interior walls.
- 7.3 Bat access via the soffits was not possible due to the Finlock construction method. Figure 3 shows the proposed works necessary to remove the Finlock slabs and rebuild the internal wall to support the roof and indicate how the slabs prevent access to the cavity.
- 7.4 The verge at the gable ends were sealed at the wall tops with no access to the rear of them where the walls were rendered. The third eastern facing gable, fronting onto Knights Road, was unrendered and did have access to the rear of the verge tiles although the wall tops could be seen to remain sealed to bat access. This was considered in survey and all elevations were properly observed.
- 7.5 The PRA consider the building to be of Low potential to support roosting bats and a single observation was carried out given the nature of the works to be carried out which included removal of the roof cover and the chimneys. The observation found that common pipistrelle bats were foraging around the Site and adjacent gardens, but no activity associated with Geraint House.
- 7.6 It was concluded that the building is unlikely to be utilised by roosting bats due to the very limited opportunities available. However, as with all buildings, there remains some opportunity and recommendations are made in section 9 to safely carry out the proposed works with no infringement of current regulations with regard to protected species.
- 7.7 The building is not considered to be a suitable hibernation site due to the well-sealed nature of it.

Potential Impact on Bats

- 7.8 The proposals are to provide an extension to the building (shown in Figure 2), replace the Finlock system, recover the roof and remove the chimneys. The proposed works will result in no significant changes to the surrounding area and will not affect foraging bats if the recommendations made in Section 9 are employed. Enhancements to the building may lead to a positive outcome for bats from the works. Given the very limited potential for bats to access the building and no evidence of them doing so it is considered that the proposed works will have **no impact** upon the **favourable conservation status** of bats within the local area.

Birds

- 7.9 No breeding bird species were noted. The proposed works will be of **no significance** in relation to nesting birds in either a local or wider context. Recommendations are made in Section 9 to enhance the property for use by swifts which were apparent during the survey.

8 RELEVANT LEGISLATION

Birds

- 8.1 Part I of the Wildlife and Countryside Act 1981 (as amended) makes it an offence (with certain limited exceptions and in the absence of a licence) intentionally to kill, injure or take any wild bird, or intentionally to damage, take or destroy its nest whilst being built or in use, or to take or destroy its eggs. Consequently, even common birds such as blackbirds or robins, and their nests and eggs are protected in this way. Any works involving removal or other management of trees or shrubs must be undertaken outside the breeding bird season (March- August).
- 8.2 Further, section 1(5) of Part 1 of the W&C Act states any person intentionally disturbing any wild bird included in Schedule 1 whilst it is building a nest or is in or near a nest containing eggs or young or disturbs the young of such a bird is committing an offence and liable to a special penalty.
- 8.3 The Conservation of Habitats and Species Regulations 2017 has strengthened the protection of wild birds and their habitats. The amendment is “To help preserve, maintain and re-establish habitats for wild birds.”
- 8.4 Under the amended Regulations, Local Planning Authorities (as well as national statutory conservation bodies such as Natural Resources Wales) are required to protect, enhance and create bird habitat.

Bats

- 8.5 British bats are protected under the Wildlife and Countryside Act 1981 (as amended). Schedule 5 of this act made it illegal to intentionally kill, injure or take any British bat. It is also an offence to intentionally damage or destroy their place of rest (the roost).
- 8.6 Further all bat species are protected under Annex IV of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora (The Habitats Directive) as amended which requires the United Kingdom government to provide bats with strict protection.
- 8.7 The Habitats Directive is transcribed into England and Wales Law by The Conservation of Habitats and Species Regulations 2017, this legislation consolidates amendments made to the earlier 2010 act. This legislation states in Part 3, Protection of Species, paragraph 43(1) that a person who:
- (a) deliberately captures, injures or kills any wild animal of a European protected species,
 - (b) deliberately disturbs wild animals of any such species,
 - (c) deliberately takes or destroys the eggs of such an animal, or
 - (d) damages or destroys a breeding site or resting place of such an animal,
- is committing an offence.
- 8.8 Further, with regard to disturbance of EPS, Paragraph 43(2) that disturbance is an act which is likely to:
- (a) to impair their ability—

- (i) to survive, to breed or reproduce, or to rear or nurture their young, or
- (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate;
- or
- (b) to affect significantly the local distribution or abundance of the species to which they belong.

- 8.9 In the case of a development involving the loss or modification of a building which may affect bats the above legislation must be considered and it may be necessary to apply to Natural Resources Wales (NRW) for a European Protected Species Licence (EPSL).
- 8.10 The introduction of the Conservation of Habitats and Species Regulations 2017 has removed the defence of killing or injuring a protected species during a lawful operation, thus even in an instance where planning permission is granted, the presence of bats must be considered and mitigated for prior to commencement of works. Under the above regulations, a NRW licence can only be given if three tests are satisfied:
- The action proposed is in the interest of preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance to the environment;
 - That there is not a satisfactory alternative;
 - That the action proposed will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.
- 8.11 Failure to satisfy the regulations and obtain an EPSL where required is likely to result in prosecution and can lead to severe fines of up to £5000 per bat and possible imprisonment.
- 8.12 Eight species of bat are listed under section 7 of the Environment Wales Act (2106). Section 7 of the Act provides a list of living organisms of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales. This is a list of species considered at threat within Wales and in need of conservation management to maintain and enhance population numbers.
- 8.13 A duty is placed on the Local Authority by the Welsh Assembly Government to maintain and enhance populations of species listed in Section 7.

TAN 5

- 8.14 Planning Policy Wales Technical Advice Note (TAN) 5, Nature Conservation and Planning, provides advice on how the planning system should contribute to biodiversity protection and enhancement. TAN 5 recognises the importance of biodiversity and the enjoyment of it. TAN 5 requires Local Planning Authorities (LPA's) to protect and enhance biodiversity during the planning process and to encourage sustainable developments. It also requires LPA's to ensure that protected Sites are properly accounted for within the planning system.

Securing Biodiversity Enhancements

- 8.15 The Chief Planning Officer sent a letter to LPAs (dated 23rd October 2019) following the refusal of a planning application. This letter has provided clarification on the Welsh Governments approach to Paragraph 6.4.5 of Planning Policy Wales 10 which sets out that *“planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity”*.
- 8.16 The purpose of this letter was to clarify that in light of the legislation and Welsh Government policy outlined above, where biodiversity enhancement is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise it will be necessary to refuse permission. Biodiversity enhancement therefore will need to be included in any future planning application.

9 RECOMMENDATIONS

- 9.1 An Ecological Clerk of Works (ECW) will be retained for the life of the project.
- 9.2 There is no evidence of roosting bats currently using the building or of them having done so historically. In the interests of best practice the removal of the lead flashing around the chimneys will be undertaken by hand. There are no other restrictions relating to the removal of roof cover.

Enhancements

- 9.3 Three swift/bat boxes will be used on the refurbished property places in the apex of the gable walls. These will provide roosting potential for pipistrelle species bats and offer nesting opportunities for swifts that are currently unavailable.
- 9.4 Bats are affected by artificial light and this can have an impact upon their foraging success. Consideration will therefore be given to the level of external lighting around the Site. Lighting will be located with consideration for bats and other nocturnal species and will avoid the adjacent sports field and neighbouring properties.
- 9.5 Any domestic lighting will be placed at a level lower than three metres, be cast to the ground with no up-lighting and will ideally be on a time switch to ensure light scatter is limited in duration. It should only be used in areas where safety is a consideration.
- 9.6 Should any soft landscaping be proposed, it should include species that attract insects and provide prey for bats and birds.

10 CONCLUSIONS

- 10.1 Geraint House does not currently and does not appear to have historically supported roosting bats.
- 10.2 There is evidence of historic bird nesting in an area where repairs have been carried out in the past preventing further access.
- 10.3 The recommendations made in Section 9 offer potential for biodiversity enhancement appropriate to the relatively small scale of works proposed to the building.

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**FIGURE 1:
LOCATIONS OF THE OBSERVERS**

Preliminary Roost Assessment and Observation, Geraint House, Margam
Hawkeswood Ecology – June 2020



Key to Observers

EA	Emma Adamson
EH	Eric Hawkeswood
LK	Liam Kelly

FIGURE 2
LOFT LAYOUT IN RELATION TO THE FIRST FLOOR FLATS

Preliminary Roost Assessment and Observation, Geraint House, Margam
Hawkeswood Ecology – June 2020

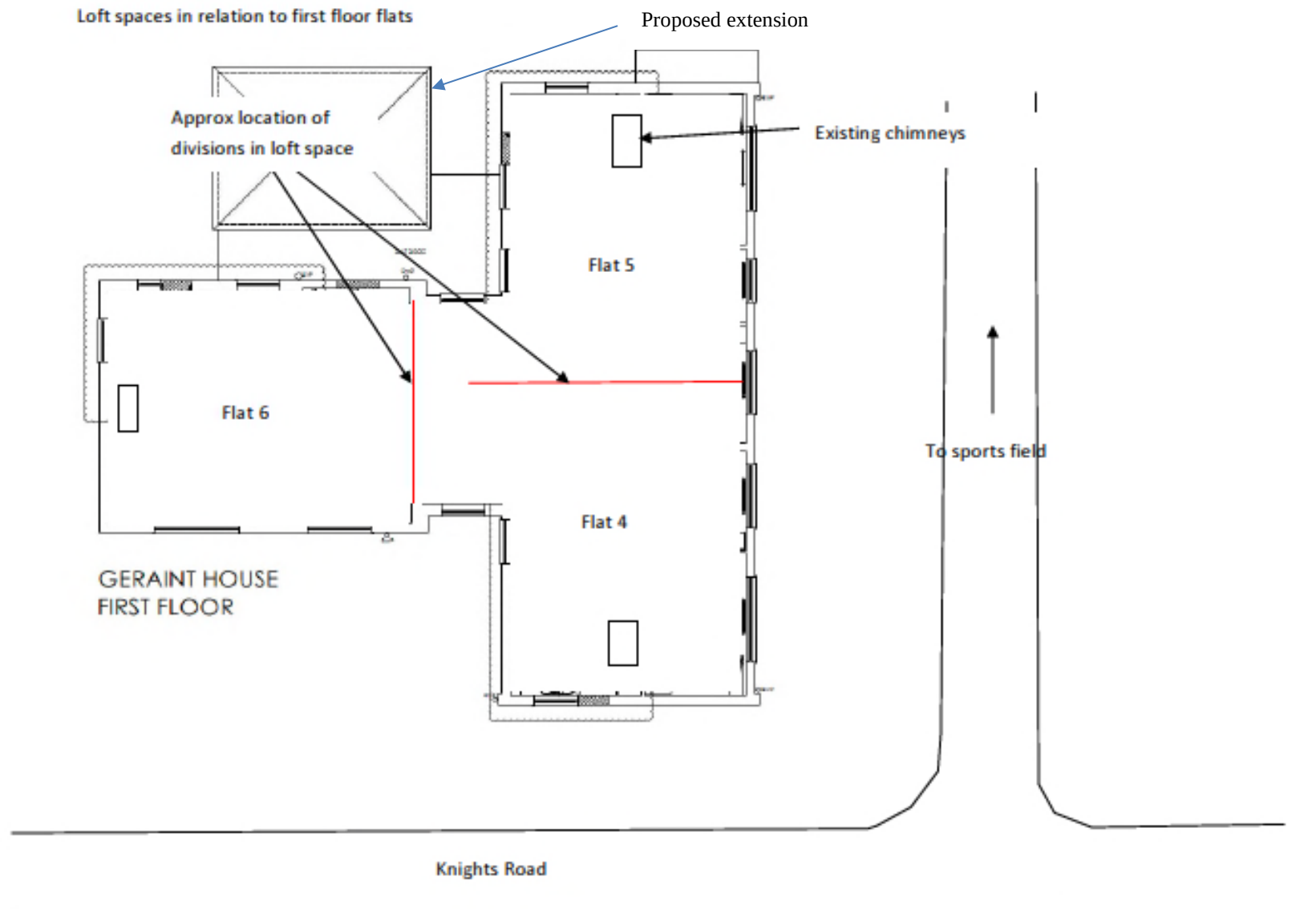
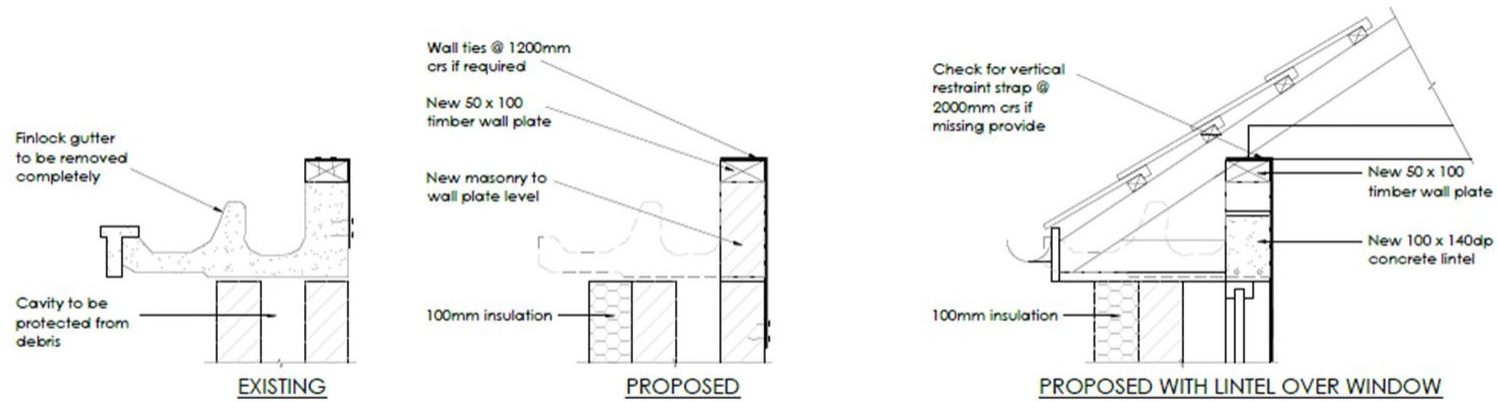
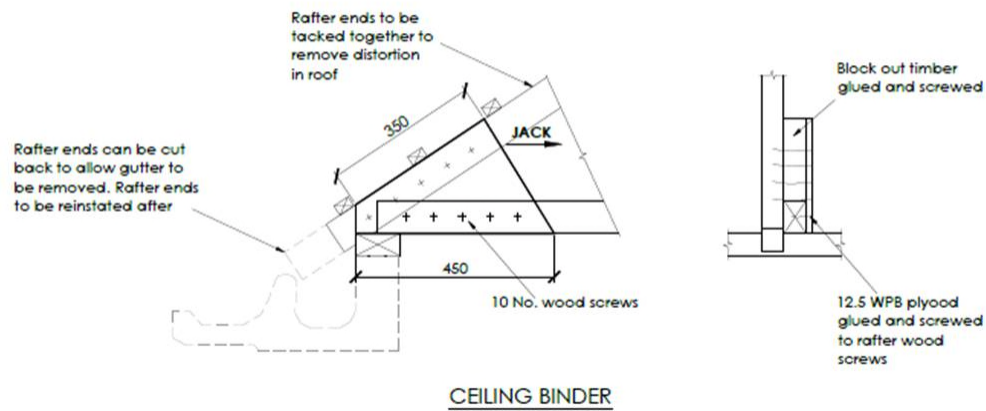


FIGURE 3
WORKS INVOLVED IN FINLOCK REMOVAL

Preliminary Roost Assessment and Observation, Geraint House, Margam
Hawkeswood Ecology – June 2020



FINLOCK GUTTER REPLACEMENT



CEILING BINDER

FIGURE 4
SCHWEGLER 1MF SWIFT/BAT BOX

Schwegler Sift/Bat Box



The Schwegler 1MF allows two pairs of Swifts to brood separately from each other. Two brood chambers with separate entrances are provided for this purpose. The rear wall is set back, providing sufficient space between the building wall and the box for Bats to use it as a roost or nursery roost. The design, shape and texture of the rear Bat area is created to meet the needs of crevice dwelling bats such as the Pipistrelle species.

**APPENDIX 1:
PHOTOGRAPHS**



The rear of Geraint House looking north west



The northern facing elevation of the main east west axis building



The southern annex



The render free eastern facing gable



The loose flashing found on two of the chimneys (indicated by arrow)



The loft over flat 6



Inside the loft over flat 5



Looking from the loft over flat 6 to the main east west axis over flats 4 and 5

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