



96 Gnoll Park Road

Neath

Preliminary Roost and Nesting Bird Assessment

October 2021

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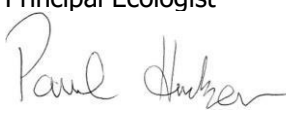
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DOCUMENT CONTROL

96 Gnoll Park Road Preliminary Bat Roost and Nesting Bird Assessment				
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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 a care facility located at 96 Gnoll Park Road (Ordnance Survey Grid Reference: SS 7573 9775).
Proposed Works	Works involve the conversion of the care facility, extension, and outbuilding into a number of residential flats and associated parking.
Survey Methodology	The preliminary bat roost assessment comprised a daytime internal and external inspection of the building, searching for signs of bats and nesting birds. The inspection provides a preliminary assessment of the potential of the site to support roosting bats.
Results of Preliminary Bat Roost Inspection	No signs of bats were found during the internal and external inspection of the care facility. The site is within a low-quality area for foraging and commuting bats.
Suitability of the Buildings to Support Roosting Bats	The care facility, extension, and outbuilding have been assessed as having moderate suitability to support roosting bats. Details of the features that led to this assessment are set out in Section 3.2 of this report and are shown in the corresponding photographs. Justification for this assessment is provided within Section 4.2.
Evidence of Nesting Birds	Four defunct nests were recorded within the loft voids.
Requirements for Additional Survey	Further surveys are required to determine if any bats are roosting within the buildings. As the care facility and outbuilding have moderate roost suitability, current best practice guidelines (Collins, 2016) suggest that it should be subject to two additional dusk emergence or dawn re-entry surveys, undertaken between May and September. Five surveyors will be required for both surveys (see Plan 4: Proposed Surveyor Positions).
Predicted Impacts of Development on Bats and Nesting Birds	Full impacts on bats and birds will be considered after the further surveys have been undertaken.
Mitigation and Compensation of Proposed Impacts	Mitigation and compensation measures for bats and birds will be determined after the further surveys have been undertaken.
Licensing Requirements for Bats	It has not been possible to determine if a European Protected Species (EPS) development licence will be required from Natural Resources Wales prior to works to the building. This will be established after the dusk emergence and/or dawn re-entry surveys have been completed.
Required Actions	Further surveys are required.

1. Introduction

1.1. Brief

This report presents the findings of a preliminary bat roost assessment and nesting bird survey of a care facility, located at 96 Gnoll Park Road (Ordnance Survey Grid Reference: SS 7573 9775¹). The care facility and outbuilding are within the boundary of Neath Port Talbot County Borough Council.

1.2. Site Description

The care facility located at 96 Gnoll Park Road is surrounded by residential housing to the north-east, south and west as well as the B4434 to the east. The River Neath is approximately 60m to the north of the site and there are playing fields and tennis courts to the south, and Gnoll County Park to the south-east. The location of the care facility is shown on Plan 1: Location Plan.

1.3. Proposed Works

The proposed works involve the conversion of the care facility, extension and outbuilding into a number of residential flats and associated parking. Existing and proposed plans can be found in Drawings 1 and 2: Development Proposals.

1.4. Legislation and Planning Policy

1.4.1. Bats

All UK species of bat are protected species. Their breeding sites or resting places² (roosts) are fully protected under the Wildlife and Countryside Act 1981³ (as amended) and the Conservation of Habitats and Species (Amendment) (EU Exit) [‘CHSAEU’] Regulations 2019⁴.

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 exceptions⁵, protected by law under Section 1 of the Wildlife and Countryside Act 1981⁶ (as amended) and the Countryside and Rights of Way Act 2000⁷. Some species, such as barn owls (*Tyto alba*),

¹ Latitude and Longitude: 51.664771, -3.798061 / what3words: Heavy.stems.rooms

² Resting places are defined as ‘areas that are essential to sustain an animal or group of animals when they are not active’ (Anon 2007).

³ <https://www.legislation.gov.uk/ukpga/1981/69>

⁴ <https://www.legislation.gov.uk/ukdsi/2019/9780111179512>

⁵ Details of the exceptions are available at <https://naturalresources.wales/permits-and-permissions/species-licensing/protected-species-licensing/general-licences-for-birds-2021/?lang=en>

⁶ <https://www.legislation.gov.uk/ukpga/1981/69>

⁷ <https://www.legislation.gov.uk/ukpga/2000/37>

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 preliminary roost assessment (PRA) comprised a daytime internal and external inspection of the house, searching for signs of bats and nesting birds, and assessing the potential for bats to roost on site.

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.

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 care facility, was undertaken, looking for features that bat could use for entering/exiting and roosting⁸. 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 4th October 2021 by Ffion Jones⁹, acting as an accredited agent of Paul Hudson¹⁰ MCIEEM (NRW Licence Number: S088190/7), and assisted by Megan Fowler¹¹.

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 2). 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.

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

⁹ 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 (S088190/7) 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>.

¹⁰ 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 been involved in 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>.

¹¹ Megan graduated with a Masters in Conservation Biology. She has recently started working for Acer Ecology Ltd as an Assistant Ecologist, after two years as a Subcontractor at Acer Ecology Ltd and Rachel Hacking Ecology. Undertaking numerous ecology surveys especially dusk emergence and dawn re-entry bat surveys. Further details can be found at: <https://www.linkedin.com/in/megan-fowler-4a1269206>

2.2.3. Survey for Nesting Birds

Searches were carried out for old nests, as well as any signs which might indicate previous nesting activities, such as piles of discarded nesting materials or large aggregations of guano.

2.2.4. 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.

Timing

The time of year when the preliminary roost assessment was carried out (October) coincides with the period when bats are seeking suitable hibernation sites, and beginning periods of torpor.

However, signs of roosting activity from previous summers may still be identified inside loft spaces and the potential of a building can be assessed outside the active season. Therefore, the timing of the inspection is unlikely to have significantly constrained the survey.

Restricted Access to the Interior of the Outbuilding

The interior of the outbuilding could not be inspected at the time of the survey, however, a full external assessment was carried out, so this is not deemed to have significantly affect the outcome of the survey. An internal inspection will be carried out when the dusk and dawn surveys are carried out.

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 loft conversions (full or partial).

3. Results

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 3: Protected Sites

Statutory Sites Notified 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 care facility.

Other Protected Sites Within 2km

There are no SSSIs and SACs within 2km of the care facility.

Country Parks

One country park is located within 2km of the care facility called Gnoll Country park.

National Nature Reserves (NNRs)

One nature reserve is located within 2km of the care facility called Eaglesbush Valley Local Nature Reserve (LNR).

Ancient Woodland Sites

Ancient Woodland Site	Number within 2km of Site
Ancient Semi-Natural Woodland (ASNW) ¹²	14
Restored Ancient Woodland Sites (RAWS) ¹³	10
Plantations on Ancient Woodland Sites (PAWS) ¹⁴	3
Ancient Woodland Sites of Unknown Category ¹⁵	0

The nearest area of ancient semi natural woodland is Gnoll Country Park located 0.45m to the south-east of the site.

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'.

Protected Sites Summary

Given the small scale and localised nature of the proposed development, the limited ecological connectivity around the site and the distance between the proposed development and any designated or non-designated sites, 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.

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

Site and Surrounding Habitats

The habitats immediately surrounding the site consist mainly of isolated trees and linked backyards and are ecologically isolated from more significant stands of woodland, and do not form a continuous habitat corridor with the wider landscape. Consequently, the site provides low-quality foraging and commuting bat habitat.

3.2.2. Building Description from the Perspective of Bat Habitat

The table below summarises the key features of the care facility.

Table 1: Key Features of the care facility

Building Type	The care facility is a three-storey semi-detached structure with a two-storey extension attached to its north-western elevation, a mono-pitched storage room is attached to the northern-western elevation of the extension and a concrete flat roof structure is attached to the north-eastern elevation of the care facility (Photo 1-4). A single detached structure exists to the north-west of the care facility within the site boundary (Photo 5-7).
Roof	The roof of the care facility is comprised of two symmetrically pitched roofs that form a cruciform shape with one running on a south-west to north-east axis and another on a north-west to south-east axis. The south-eastern elevation is constructed from concrete interlocking tiles with clay ridge tiles (Photo 8). The north-western elevation is constructed of slate. The roof of the extension is also symmetrically pitched and comprised of slate and clay ridge tiles. The mono-pitched extension has a slate roof (Photo 9). Additionally, a dormer window on the north-eastern elevation of the extension has slate and concrete ridge tiles (Photo 4), these are in good condition with minimal gaps beneath. The roof of the outbuilding is constructed of slate and concrete ridge tiles (Photo 5 and 7).

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

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	The roof tiles of the care facility, extension and outbuilding are generally well aligned, however, a few damaged or slipped slates were noted on the north-western elevation of the care facility and the outbuilding (Photos 4 and 10). Edge tiles at the eaves are impeded by close-fitting guttering on all elevations of the care facility, extension and outbuilding. Edge tiles at the gable ends on the south-eastern elevation of the care facility are capped with uPVC plastic trim which is tight fitting (Photo 3). The gable ends on the north-western elevation of the care facility are uncapped; the slate generally sits flush to the bargeboards, however a slate on the north-western gable end of the care facility appears to be missing (Photo 11). Additionally, the clay ridge tile on the north-western elevation of the care facility is lifted (Photo 11).
Chimneys	Three metal chimneys are located on the boundary of the north-western elevation of the care facility, some of the lead flashing at the base of the chimneys is raised (Photo 11).
Lead Flashing	The lead flashing at the roof valleys of the care facility appear to be in good condition (Photo 8). Lead flashing is tight fitting to the dormer window on the north-eastern elevation of the extension (Photo 12).
Soffits, Fascias and Bargeboards	The timber fascias on the north-western and eastern elevations of the care facility and the extension, have lifted from the external walls (Photos 13 and 14). On the south-eastern elevation of the care facility the soffit has suffered damage creating a gap (Photo 15). Additionally, the timber soffits on the extension have gaps along their length, with a large hole in the soffit on the north-eastern elevation (Photos 16-18). The bargeboards on the western and eastern elevations of the mono-pitched structure are lifted from the external walls creating gaps underneath. Likewise, the bargeboards and fascias on the outbuilding are lifted from the external walls (Photos 19 and 20).
Vents	There is a clay vent on north-eastern elevation of the flat roof structure (Photo 2).
External Walls	The north-eastern and south-western elevations of the care facility comprise stone and mortar which is in good condition. The north-western elevation of the care facility, and all elevations of the extension, comprise concrete render which only has hairline cracks that are superficial (Photos 1-4). The outbuilding has red brick comprising the external wall on the north-western elevation and concrete render on the remaining elevations (Photos 6, 7 and 21). There is a large fissure in the concrete render on the south-eastern elevation of the outbuilding (Photo 20).
Windows	The windows and doors of the care facility and extension have uPVC frames that sit flush in their frames. The windows of the outbuilding comprise glass and timber frames, with metal barring on the north-eastern elevation. The windows and doors on the north-western elevation are boarded with timber plywood with there are narrow gaps between the timber plywood and red brick (Photo 5).
Roof Void	Roof void 1 above the extension is approximately 1m high, 4.5m wide, by 9.5m long. Roof Void 2 above the care facility is approximately 1m high, 10m wide by 7.5m long (Photos)
Roof Lining	The roof voids are lined with underfelt (Photo 22).
Roof Construction	The internal roof void is a typical truss design (Photos 22 and 23).
Insulation of Void	Some fibreglass insulation is present in the roof voids (Photos 22 and 23).
Security Lighting	Four security lights are present on the care facility, extension, and outbuilding (Photos 2,4 and 7).

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Photos Showing the Care Facility, Extension and Outbuilding and their Features

Photo 1: Northern-Western Elevation of the Care Facility and Extension and Location of Lifted Ridge Tile



Photo 2: North-Eastern Elevation of the Care Facility



Photo 3: South-Eastern Elevation of the Care Facility



Photo 4: North-Eastern Elevation of the Two-Storey Extension and Circled Security Light and Slipped Slate



Photo 5: North-Western Elevation of the Detached Outbuilding



Photo 6: South-Western Elevation of the Detached Outbuilding



Photo 7: North-Eastern Elevation of the Detached Outbuilding



Photo 8: Roof of the Care Facility



Photo 9: Roof of Mono-Pitched Extension



Photo 10: Damaged Slate on the North-Western Elevation of the Outbuilding, Circled



Photo 11: Missing Slate on the North-Western Gable End of the Care Facility, Circled



Photo 12: Lead Flashing on the Dormer Window



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Photo 13: Lifted Fascias on the North-Western Elevation of the Care Facility



Photo 14: Gap in Timber Soffit of Extension on the North-Western Elevation



Photo 15: Gap in Timber Soffit of Care Facility on South-Eastern Elevation



Photo 16: Gap in Timber Soffit of Extension on the North-Western Elevation



Photo 17: Gap in Timber Soffit of Extension on the North-Western Elevation



Photo 18: Hole in Soffit of Extension on the North-Eastern Elevation



Photo 19: Lifted Fascias on Outbuilding



Photo 20: Lifted Fascias on Outbuilding



Photo 21: North-eastern elevation of Outbuilding



Photo 22: Roof Void 1 Above Extension



Photo 23: Roof Void 2 Above Care Facility



3.2.3. Potential Bat Access Points and Bat Roosting Locations

Potential Access Points for Bats in the Care Facility and Extension

There are numerous potential access points for bats to gain entry into the interior. Bats could gain entry through the numerous gaps in the soffit boxes, under the fascias and bargeboards, under ridge tiles and slate.

Potential Access Points for Bats in the Outbuilding

The gaps under the fascias and bargeboards and the damaged slate provide potential access points for bats to gain entry into the interior.

Potential Roosting Sites for Bats in the Care Facility and Extension

The following potential roost sites were recorded:

- R1 – Slipped slate on the south-western elevation (see Photo 4);
- R2 – Lifted ridge tile (see Photo 11);
- R3 – Broken slate on the south-western elevation (see Photo 11); and
- R4 – Gaps under bargeboards and fascias (see Photos 13,14,16,17 and 18).

Potential Roosting Sites for Bats in the Outbuilding

The following potential roost sites were recorded:

- R5 – Underneath gaps in the fascias and bargeboards (see Photos 19, 20 and 21);
- R6 – Cracks in the concrete render on the south-eastern (see Photo 20);
- R7 – Gap under the damaged tile on the north-western elevation (see Photo 10); and
- R8 – Gaps between the timber plywood and red brick on north-western elevation (see Photo 5).

3.2.4. Nesting Bird Survey

There were four defunct bird's nest that were recorded within the two loft voids. Roof void 1 had one nest near the south-western elevation at the eaves of the extension and one on the gable end. Roof void 2 had one nest on the south-western elevation gable wall and one on the north-eastern gable wall. The species that have built the nests could not be determined.

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Photos Showing Bird Nests

Photo 24: Roof Void 1 Showing Nest 1



Photo 25: Roof Void 1 Showing Nest 2, Circled



Photo 26: Roof Void 2 Showing Nest 3



Photo 27: Roof Void 2 Showing Nest 4



4. Evaluation

4.1. Summary of Preliminary Roost Assessment

The preliminary roost assessment found no evidence of bats roosting within or on the external parts of the care facility. However, bats roost within inaccessible parts of buildings and so absence of evidence does not always equate to absence of bats roosting.

4.2. Suitability of Summer Roosts

The care facility and extension are assessed as having:

- Moderate 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 under the fascias and bargeboards, under slates and the clay ridge tile. The care facility has a number of possible access points and roosting features which could feasibly be used by roosting bats, but due to their size, shelter, protection, conditions and surrounding habitat, are unlikely to support a roost of high conservation status;
- Moderate suitability for use by roof-void-dwelling bats¹⁷ (long-eared species and large *Myotis* bats, such as Natterer's bat (*Myotis nattereri*) and serotine bats (*Eptesicus serotinus*)) due to the numerous access points into the roof voids via the gaps under the fascias, bargeboards and damaged slate. However, evidence of void-dwelling species is usually readily apparent within the void; and
- Negligible suitability for use by direct-access species requiring a large access point⁶ and large roost space (lesser horseshoe (*Rhinolophus hipposideros*) and greater horseshoe (*Rhinolophus ferrumequinum*) bats)), due to the lack of large access points into the building.

The outbuilding is assessed as having:

- Moderate 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 under the fascias and bargeboards, under damaged slates, and between the crevices in the concrete render. Whilst the outbuilding has a number of possible access points and roosting features which could feasibly be used by roosting bats, due to their size, shelter, protection, conditions and surrounding habitat, it is unlikely to support a roost of high conservation status;
- Moderate suitability for use by roof-void-dwelling bats¹⁸ (long-eared species and large *Myotis* bats, such as Natterer's bat (*Myotis nattereri*) and serotine bats (*Eptesicus serotinus*)) due to the

¹⁷ 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.

¹⁸ 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.

numerous access points into the roof voids via the gaps under the fascias, bargeboards and damaged slate; and

- Negligible suitability for use by direct-access species requiring a large access point⁶ and large roost space (lesser horseshoe (*Rhinolophus hipposideros*) and greater horseshoe (*Rhinolophus ferrumequinum*) bats)) due to the lack of large access points into the outbuilding.

The care facility, extension and outbuilding have an overall moderate bat roosting suitability due to the reasons stated above. This assessment will be used to determine the level of further survey effort required (see Appendix 2).

4.3. Potential Winter Roosts

The crevices between the concrete render on the outbuilding provide potential hibernation sites for bats. However, a full assessment of the potential for winter use (i.e. hibernation) will be undertaken after the completion of further dusk emergence and dawn re-entry surveys.

4.4. Birds – Interpretation of Nesting Bird Survey

Further surveys for nesting birds will be undertaken at the same time as the dusk emergence and dawn re-entry surveys, and the assessment of its importance subsequently updated.

5. Required Actions

5.1. Further Work

Works should not commence until further surveys have been carried out. This will enable the likely impacts of the proposals on bats to be assessed, determine if a NRW bat development licence will be required, inform the avoidance measures (timing of works) and determine the requirement for mitigation (retention of roosts and access points) and/or compensation measures (creation of new replacement/additional bat roosts).

Current best practice guidelines (Collins, 2016) state that buildings with moderate roost suitability should be subject to two survey visits, comprising at least one dusk emergence and a separate dawn re-entry survey. The surveys should be undertaken from May to September with at least one of the surveys between May and August. To ensure that all potential bat access/roosting features are covered, both surveys will require five surveyors to be present (see Plan 6: Proposed Surveyor Positions).

Surveys should be timed to sample as much of the survey period as possible, and undertaken at intervals of at least two weeks apart, or preferably more (Collins, 2016), to increase the possibility of encountering bats that may only use the buildings for short periods throughout the summer.

5.2. Licensing Requirements for Bats

It has not been possible to determine whether a NRW bat development licence with respect to bats will be required. This will be determined after the emergence/re-entry surveys have been completed.

5.3. Avoidance, Mitigation, Compensation and Enhancement Measures for Bats and Birds

These measures (if required) will be formulated after the completion of dawn re-entry and dusk emergence surveys.

5.4. 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 factors¹⁹ (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 42020:2013²⁰ and CIEEM (2019), to determine if conditions and bat use has changed since described in the current report.

¹⁹ 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.

²⁰ 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.

6. 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.

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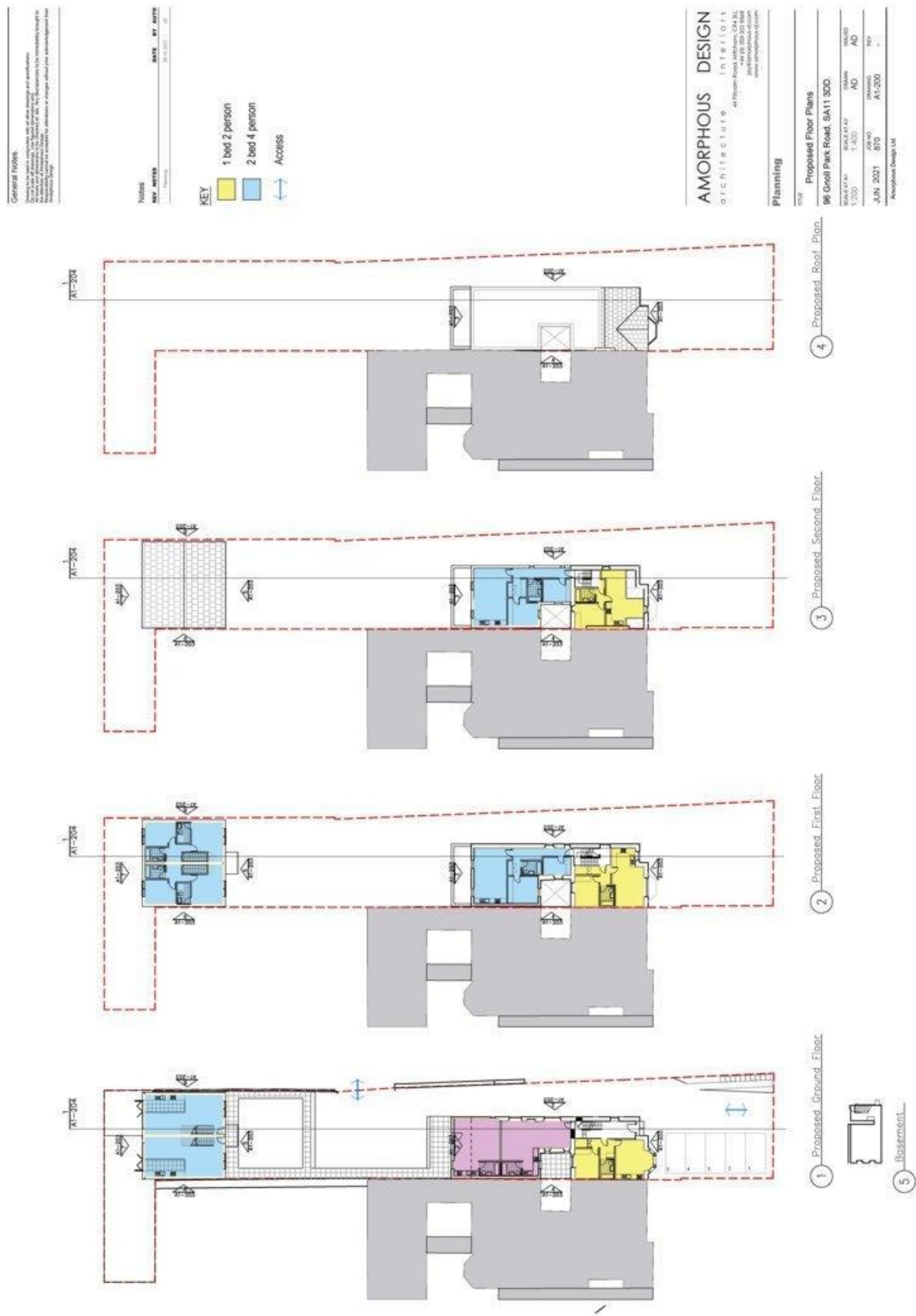


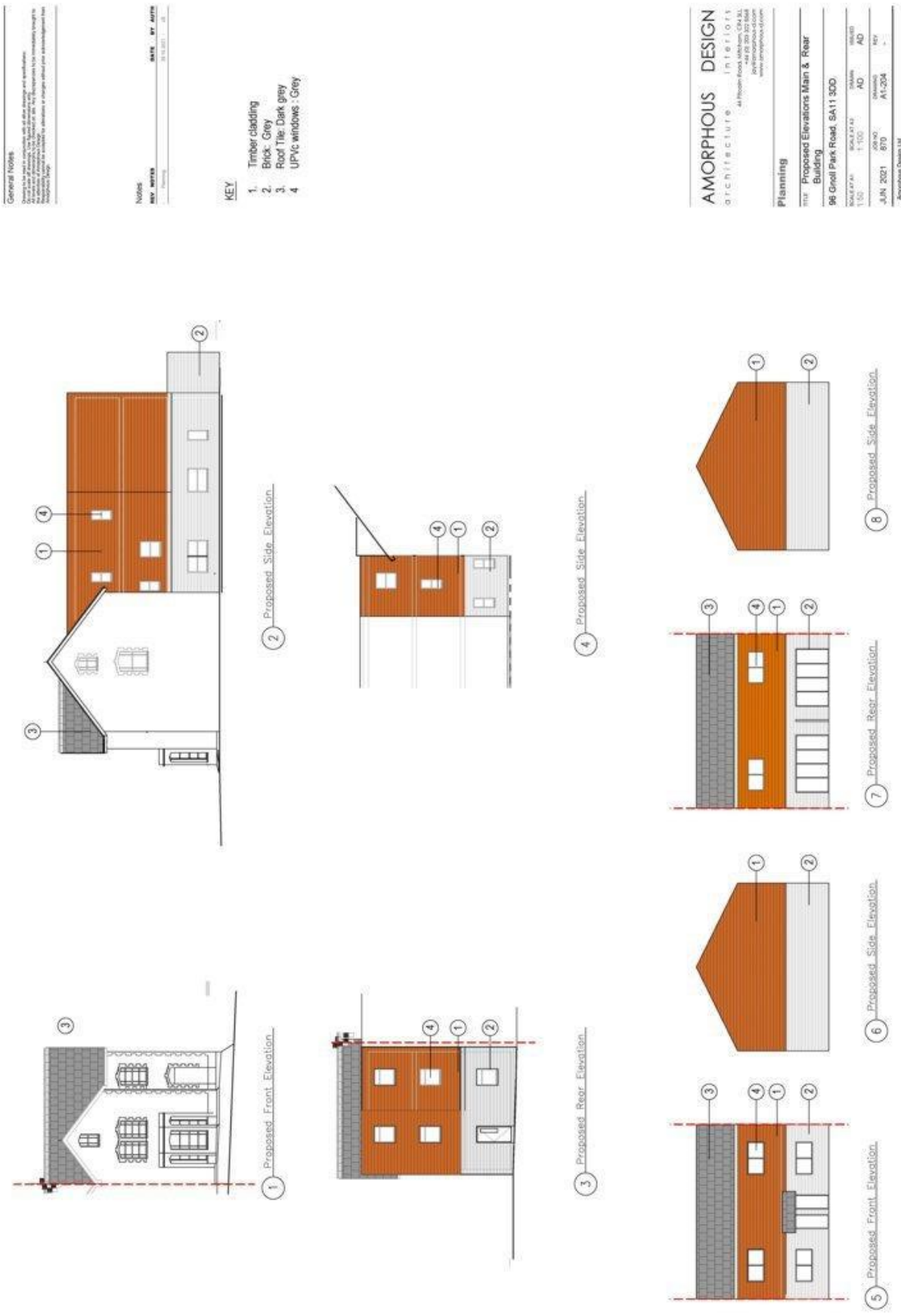
Notes	DATE BY AUTHOR
NEW NUMBER	20 10 2013 1 00

Planning

DATE	Existing Elevations			
96 Grell Park Road, SA11 3DD				
SCALE AT A1	SCALE AT A2	CHAIRMAN	ISSUED	
1:50	1:100	A0	A0	
JUN 2021	870	Chairman	REV	
			A1-101	
Architectural Design Ltd				

Drawing 2: Proposed Development





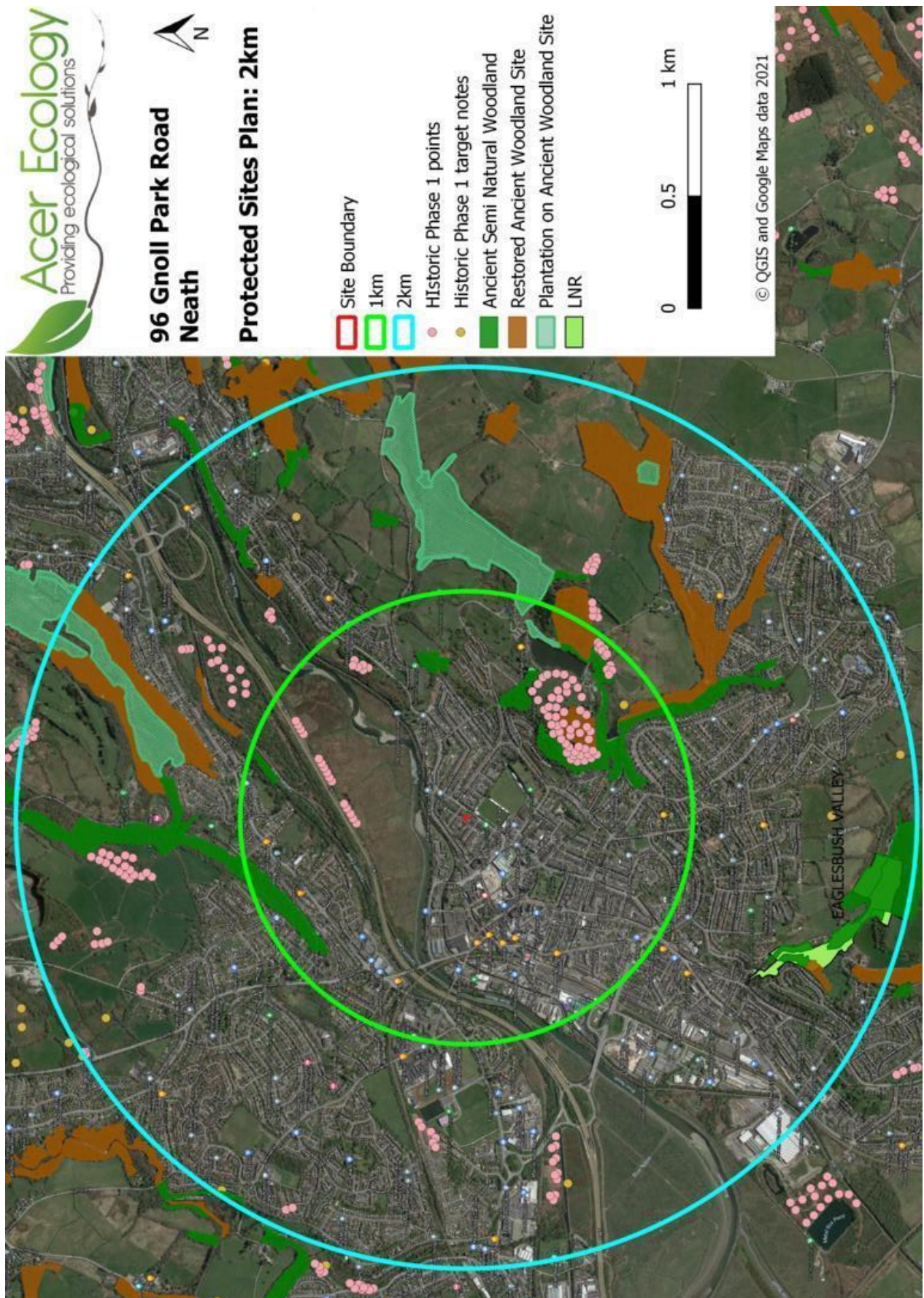
Plan 1: Location Plan



Plan 2: Location/Block Plan



Plan 3: Protected Sites



Plan 4: Building and Preliminary Roost Inspection



Plan 5: Proposed Surveyor Positions for Dusk Emergence and Dawn Re-entry Surveys



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 have undergone massive population declines over the last century. Some species, such as common (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus pygmaeus*) are relatively common and widespread in the UK, while others, such as greater horseshoe (*Rhinolophus ferrumequinum*) bats, 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 2016²¹ 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 and greater horseshoe bats).

²¹ <http://www.legislation.gov.uk/anaw/2016/3/contents>

Appendix 2: 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 ²²
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 ²³ 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 ²⁴ .	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 ²⁵ (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 ²⁶ . 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.

²² Adapted from Tables 7.1 and 7.3 of the Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2016).

²³ For example, in terms of temperature, humidity, height above ground levels, light levels or levels of disturbance.

²⁴ 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.

²⁵ '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.

²⁶ 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.

Acer Ecology

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.