

60 GWILYM ROAD, CWMLLYNFELL

PRELIMINARY ROOST ASSESSMENT & BAT ACTIVITY REPORT

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1.0 INTRODUCTION

- 1.1 Bay Ecology Ltd was commissioned to undertake a building inspection with particular regard to the likely presence of roosting bats and nesting birds at No. 60 Gwilym Road located in Cwmllynfell (Grid Ref: SN 74563 12935 & Appendix I). The former bakery structure is to be refurbished and converted to a residential and commercial property.
- 1.2 An external and internal inspection of the former bakery was undertaken on the 24th June 2025 by David Rees whom is a suitably experienced ecologist¹. The building is a two-storey semi-detached pebble dashed structure that possessed a pitched roof and gable end chimney at its western extent. The structure also possessed a single storey mono pitched extension on its southern elevation, which joined onto the adjacent residential property located to the east. A detached single storey outbuilding was located to the south of the property, which possessed a mono pitched corrugated asbestos roof. The property is predominantly surrounded residential properties and their curtilages. However, scrub and broadleaf trees were located immediately south west of the rear curtilage; that were considered to be suitable foraging habitat for the local bat species.
- 1.3 The building possessed potential bat roosting features associated with the fascias and raised slate tiles on the extension, that could be utilised by individual bats, and as such a further dusk emergence survey was conducted in August 2025 to inform the planning application.
- 1.4 This report provides a summary of the daytime inspection and bat activity survey conducted between June and August 2025, and includes recommendations on any ecological constraints/ opportunities associated with the proposed extension works.

¹ Full Member of the Chartered Institute of Ecology & Environmental Management with 15+ years experience in bat survey work & NRW bat licence holder S093085/1.

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2.0 METHODOLOGY

2.1 In order to establish the baseline ecological conditions on site and in the adjoining habitats, a combination of desk-based consultation, building inspection and activity surveys were undertaken between June and August 2025.

Desk study

2.2 This element of the work primarily involved an internet data search/review of previous Bay Ecology reports (within the area) to identify any known records of bats or nesting birds onsite or within the surrounding area (within 2km and 1km radius respectively) that could require consideration as part of any development proposal (i.e. to inform constraints/opportunities).

Daytime Inspection

2.3 The preliminary roost appraisal comprised of an internal and external of the structure. In order to establish the potential presence of roosting bats (or nesting birds) at the building, the survey aimed to identify:

- if bats are, or have been, present within the building and, if so, which species are present;
- the type of roost (e.g. day roost, feeding perch, night roost, hibernaculum);
- how bats use the buildings (e.g. location of, exit and entrance points to potential roosts);

2.4 External surveys at the site involved the use of binoculars and ladder to identify possible access/entry points into the buildings and aimed to identify any evidence of use by bats such as droppings, staining, prey remains etc.. The internal survey searched for similar evidence of current or historical use by bats. The survey was undertaken from ground-level around the exterior of the buildings; and was assisted by the use of close-focus binoculars and a high powered torch (1 million candlepower). No loft space was evident in the southern extension.

2.5 The surveyor searched for roost evidence (droppings, staining, scratch marks, etc.) as described above and an assessment of the buildings potential to support nesting birds was also undertaken. The scope of the bat inspection survey was based on guidelines published by the Bat Conservation Trust (BCT)(2023).

Bat Activity Surveys

- 2.6 The daytime inspection conducted at structure identified the structure as being of 'low' suitability for roosting bats (as described in the Bat Conservation Trust 2023 guidelines) due unto the potential bat roosting features that could be utilised by individual bats and surrounding built up habitat with limited connectivity to suitable habitat. As described within the guidelines, buildings with low suitability require a single dusk emergence survey conducted in the optimal bat activity season (May-August). In order to achieve visual coverage of the potential access/entry points associated with the structure a single surveyors was present during the survey.
- 2.7 The dusk emergence survey was undertaken on the 28th August 2025 by a single experienced surveyors. The dusk emergence survey commenced 15 minutes prior to sunset and extended for approximately 90 minutes after sunset (BCT, 2023). Weather conditions were of no constraint to the survey with no precipitation experienced during the survey (some showers earlier in day and post survey) and a light wind (Beaufort 2-3). A temperature of 14°C was recorded during the survey. The was conducted by David Rees whom is a Full Member of the Chartered Institute of Ecology & Environmental Management with 15+ years experience in bat survey work (BCT Level 3-4) & NRW bat licence holder S093085/1.
- 2.6 The surveyor was positioned to ensure maximum coverage of the building's potential bat roosting features, with the surveyor located south of the structure providing maximum coverage of the identified features. During the survey an InfraRed camera and thermal camera was placed south of the main structure and west of the southern extension (respectively) to provide additional coverage (Whisker NightFox camera and Pixfra Arc 613) of the identified access points. During the survey full spectrum detectors (Peersonic) were used to allow both in field and office based sonogram analysis of bat calls. All calls were recorded and identified on computer-based sonogram analysis software (Wavesurfer) and BatClassify.

3.0 RESULTS

Desk study

- 3.1 The internet species data search confirmed that there were no records of bats onsite or within a 2km radius. However, numerous records of Natterer's Bat *Myotis nattereri*, Soprano Pipistrelle *Pipistrellus pygmaeus* and Whiskered bat *Myotis mystacinus* were identified just over 2km north of site and were associated with hibernation monitoring surveys. The above records of crevice dwelling bat species were considered to be of some relevance to site.
- 3.2 A number of roof nesting birds were identified within 0.15km of site including House Sparrow *Passer domesticus*, Starling *Sturnus vulgaris*, Jackdaw *Corvus monedula*, of which house Sparrow was considered to be of some relevance to the surveyed structure.

Day-time inspection

Overview

- 3.3 The results of the day-time inspection are summarised in the following sections.

External Survey

- 3.4 No. 60 Gwilym Road is a semi-detached two storey rough cast structure with a pitched roof that possessed western gable end chimney (Cover Photo & Photo 1). A single storey extension was located on the southern elevation of the structure, which possessed a mono pitched slate roof and bitumastic flat roof out house (Photo 2). The extension joined onto the rear extension of the adjoining residential property located to the east. The main residential structure possessed uPVC window frames, doors, fascias and rain water goods. However, the extension possessed uPVC window frames and doors; with wooden fascias and metal rainwater goods.
- 3.5 Limited potential bat roosting features were associated with a gap beneath the western gable end fascia on the southern pitch (Photo 3); as well as raised slates on the southern mono pitch extension (Photo 4), and a gap behind a rotten wooden corner fascia (Photo 5). However, no evidence of roosting bats was found externally during the thorough inspection. The features identified on the structure were only capable of supporting individual bats.

Photo 1: Northern elevation of property (view looking south).



Photo 2: Southern single storey mono pitched extension (view looking east).



Photo 3: Gap beneath fascia on western gable of southern pitch (view looking south east).



Photo 4: Gap beneath raised slate on southern extension (view looking east).



Photo 5: Gap around rotten wooden fascia on southern elevation of southern extension.



Internal Inspection

- 3.6 The internal inspection of the structure identified that the loft space was dark and draft free with exposed wooden rafters and bitumastic roof felting evident throughout (Photo 6). No evidence of roosting bats was identified internally.

Overall

- 3.7 The structure was considered to be of low suitability for roosting bats due to the PRFs that could only support individual bats and limited suitable habitat connectivity.

Photo 6: Exposed wooden rafters and bitumastic roof felting evident throughout (view looking west).



Outbuilding Inspection

- 3.8 A single storey rough cast outbuilding was located south of the southern extension (Photo 7). The outbuilding possessed a mono pitched corrugated asbestos roof and wooden doors. Access points to the interior was evident under the corrugated asbestos roof. However, a thorough inspection identified no evidence of roosting bats and as such the structure was considered to be of negligible suitability for roosting bats.

Photo 7: Mono pitched outbuilding (view looking south east).



Bat Emergence Survey Results

Dusk Emergence Survey 28th August 2025

3.9 No bats were recorded emerging from the structure. In general, very low levels of bat activity were recorded during the survey with only an individual Common Pipistrelle *Pipistrellus pipistrells* recorded during the survey, foraging over the rear curtilages located to the south. The bat was recorded at 20.33h approximately 22 mins post sunset (20.11h). Figures 1 & 2 shows the typical view from the thermal camera located beneath the western gable end PRF and the static infrared camera located to the west of the rear extension.

Figure 1: Thermal camera view of western gable end fascia gap.

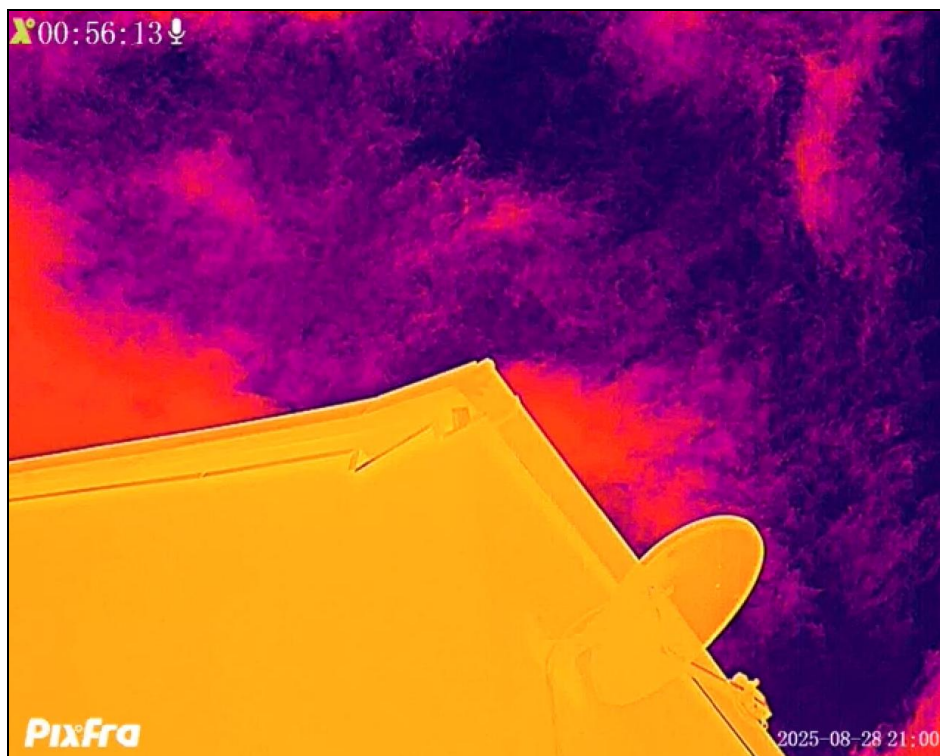


Figure 2: IR Camera view of southern extension slate roof (view looking east).



4.0 LEGISLATION, POLICIES AND PLANS

- 4.1 The following international, national and local legislation and planning policies pertaining to bats, nature conservation and biodiversity are considered of some relevance to the works.

Legislation Pertaining to the Protection of Bats

- 4.2 Under Annex II of the *Council Directive 92/43/EEC 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora* (EC Habitats Directive) some bat species are listed as of Community Interest, the conservation of which requires designation of Special Areas of Conservation (SACs); Under Annex IV of the EC Habitats Directive all bat species are listed as of Community Interest, in need of strict protection. In England and Wales, the EC Habitats Directive has been transposed into law in 1994 and, following recent amendments is set out in the *Conservation of Habitats & Species Regulation 2010* to give bats, their breeding sites and resting places a high level of strict protection making it an offence (subject to certain specific exceptions) to deliberately capture or kill/injure a bat, to damage or destroy a place used for shelter or protection or to deliberately disturb a bat in such a place.
- 4.3 Bats are also afforded protection within England and Wales under the Wildlife and Countryside Act 1981 (as amended); Countryside and Rights of Way Act 2000; Natural Environment and Rural Communities Act 2006.
- 4.4 Case Law² has placed an onus on local planning authorities to satisfy ‘three tests’ under the Habitats Directive when determining applications that could affect European Protected Species. Essentially, these three tests are: i) that there is no satisfactory alternative; ii) that the proposed development is in the over-riding public interest (including those of a social or economic nature) and iii) the proposed development would not adversely affect the Favourable Conservation Status of the species locally.

Legislation Pertaining to Birds

- 4.5 Under the Wildlife & Countryside Act 1981 (as amended) all wild birds are protected against killing or injury and their nests against damage or destruction whilst they are being built or contain eggs/dependent young.

² Wooley vs. East Cheshire (2009) and Morge vs. Hampshire County Council (2010)
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Planning Policy Wales (2024)(Edition 12)

- 4.6 This document set out the land use planning policies of the Welsh Government with Chapter 6 relating to Distinctive and Natural Places and in particular Section 6.4 Biodiversity and Ecological Networks, which states how the planning system has a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement. Addressing the consequences of climate change should be a central part of any measures to conserve biodiversity and the resilience of ecosystems.
- 4.7 The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty). This duty applies to public authorities in the exercise of their functions in relation to Wales and will help maximise contributions to achieving the well-being goals.
- 4.8 The planning system must help to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement. Addressing the consequences of climate change should be a central part of any measures to conserve biodiversity and the resilience of ecosystems.
- 4.9 In fulfilling this duty, planning authorities must have regard to the list of habitats and species of principal importance for Wales, published under Section 7 of the Environment (Wales) Act 2016.
- 4.10 The broad framework for implementing the Section 6 Duty and building resilience through the planning system includes addressing:
- Diversity between and within ecosystems;
 - Extent and scale of ecosystems;
 - Condition between and within ecosystems;
 - Connectivity of ecosystems including their structure and functioning; and
 - Adaptability to change of ecosystems.

Future Wales the National Plan 2040

- 4.11 Future Wales – the National Plan 2040 is our national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including developing strong ecosystems.

Policy 9 – Resilient Ecological Networks and Green Infrastructure

To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

- identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and
- identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.

Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.

5.0 CONCLUSIONS AND RECOMMENDATIONS

5.1 The preliminary roost assessment undertaken at No. 60 Gwilym Road conducted on the 24th June 2025 identified potential bats roosting features associated with limited gaps under gable end fascias and raised roof tiles. However, no evidence of roosting bats was identified externally or internally. The presence of limited PRFs on the structure that could be utilised by individual bats, meant the structure was considered to be of low suitability for roosting bats and as such a single dusk survey was conducted on the 28th August 2025. During the survey no bats were recorded emerging from the structure with only a single bat recorded during the survey.

5.2 On this basis, it is considered that the proposed works will not require further surveys or a European Protected Species (EPS) derogation licence. However, it is recommended that a precautionary approach to the works be adopted given the itinerant nature of roosting Pipistrelle sp. that was identified foraging/commuting around the site curtilage in the activity survey. The possibility that the structure could potentially be utilised by individual bats on an irregular or occasional basis during future bat activity seasons could not be ruled out and a precautionary approach as follows would be appropriate:

- Builders advised prior to the start of works of the low risk that bats could be present and the action to take should a bat be discovered (see below);
- Removal of roof tiles, fascias and lead flashing to be undertaken by hand or using hand-tools (e.g. crowbars etc.);
- In the unlikely event that a bat were discovered, all works would cease immediately and Natural Resources Wales (NRW) or the project ecologist contacted for advice on how to proceed.

Other considerations - birds

5.2 There is potential that the structure is utilised by nesting birds such as House Sparrow. All nesting birds are protected under the Wildlife Countryside Act 1981 and the works should be programmed to be conducted outside the bird nesting season (March-September) or preceded by a visual inspection. If any evidence of nesting birds is identified the project ecologist should be consulted.

Biodiversity Enhancement

5.3 To enhance biodiversity in the area it is recommended that a Swift Box and Beaumaris Bat Box Maxi (or similar) are erected on the western gable end.

REFERENCES

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APPENDIX I – SITE LOCATION PLAN