

# BAT SURVEY REPORT

**Hafan Brynheulog**

Ffordd Brynheulog  
Pontardawe  
SA8 4JW

**ON BEHALF OF:**

**Tai Tarian Ltd**



|                         |                                                         |                  |
|-------------------------|---------------------------------------------------------|------------------|
| <b>Site Address:</b>    | Hafan Brynheulog, Ffordd Brynheulog, Pontardawe SA8 4JW |                  |
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| <b>Report Author</b>    | Phoebe Williams                                         | Senior Ecologist |
| <b>Report Reviewer</b>  | Robert Morgan                                           | Senior Ecologist |




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|----------------------------|------------------------------------------------------------------------|
| <b>Directors</b>           | Robert Morgan<br>Phoebe Williams BSc (Hons) MSc                        |
| <b>Registered Office</b>   | Suite 131 -136, Plas y Ffynnon, Cambrian Way, Brecon LD3 7TG           |
| <b>Website</b>             | <a href="http://www.justmammals.co.uk">www.justmammals.co.uk</a>       |
| <b>E-mail</b>              | <a href="mailto:phoebe@justmammals.co.uk">phoebe@justmammals.co.uk</a> |
| <b>Telephone</b>           | 01874 623616                                                           |
| <b>Registered in</b>       | Wales                                                                  |
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## 1 Executive Summary

- 1.1 Hafan Brynheulog is proposed to be re-roofed. To support the proposals, a Preliminary Roost Assessment was carried out in August 2025. The primary focus for the appraisal was the presence, or potential presence, of bats and nesting birds. Day time inspection found no live bats internally or externally. However, bat droppings were noted within several of the loft spaces, in addition to several Potential Roost Features across the building.
- 1.2 A total of three dusk emergence/activity observations were carried out in August and September 2025. The observations revealed the presence a pipistrelle sp., common pipistrelle and serotine summer day roosts, for a small number of individuals. No evidence was found during the survey effort to suggest the presence of a maternity colony.
- 1.3 It will be necessary to obtain a European Protected Species licence in order to carry out the proposed re-roofing works. All bat species and their places of rest are fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), and the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019. The legal protection for bats concerns impacts from disturbance, loss of roost locations, modifications to roosts and loss of access or obstruction to roost locations. **The European Protected Species licence must be obtained before work commences that affects bat roosts.**
- 1.4 A Scheme of Mitigation will be required as part of the process to make the application for the European Protected Species licence. Recommendations for long-term and shorter-term mitigation provision are outlined in this report.
- 1.5 Assessment also considered the presence of breeding birds. No active nests were found. An old, inactive nest was noted inside loft space 2 inside the southern section of the building. Breeding birds are protected under the provisions of the Wildlife and Countryside Act 1981 (as amended), and active bird nests cannot legally be disturbed or destroyed. General advice on the legal protection afforded to breeding birds is provided in this report in an unlikely event a nest is found during the works.
- 1.6 This report also includes recommendations to for the enhancement for biodiversity as part of the works.

## 2 Introduction

- 2.1 Hafan Brynheulog is a retirement home in Pontardawe, at National Grid Reference (NGR) SN 71889 04293 at an altitude of 54m Above Ordnance Datum.
- 2.2 Plans for the building include a complete re-roof. A Potential Roost Assessment (PRA) of the building was completed during a daytime inspection in early August 2025, by a licensed ecologist and assistant. This assessment found bat droppings within several loft spaces, in addition to Potential Roost Features (PRFs) across the building. Consequently, three dusk /activity observations were completed in August and September 2025.
- 2.3 The main objective of this report is to identify any development impacts that may arise in relation to the presence of legally protected species – namely bats and nesting birds. Therefore, the assessment was undertaken in order to:
  - consider the presence of bats or potential roosts;
  - determine the presence of nesting birds;
  - assess whether bats or nesting birds are likely to be impacted by the proposed works;
  - gather sufficient information to be able to make appropriate recommendations, and;
  - use survey findings to recommend appropriate mitigation measures for safeguarding ecology on site.
- 2.4 A previous survey of the site was undertaken by Hawkeswood Ecology in 2016. This included a daytime inspection and three dusk observation surveys. A summary of the findings of this survey are included in this report.

## 3 Survey Team Experience

- 3.1 Lead surveyor was Phoebe Williams, who is also author of this report. The dusk emergence observations were carried out by a small team of ecologists and survey assistants. Table 5 in Appendix II details ecological survey experience of the surveyors.

## 4 Survey Methodology

- 4.1 The PRA of the Hafan Brynheulog was undertaken in August 2025 with the aim of detecting any signs of bat or bird presence. Three dusk emergence / activity surveys were completed in August and September of the 2025 season. Night Vision Aids (NVA) by way of Infra-Red Cameras and Guide Tk612 Gen2 Thermal Imaging Monoculars were used to assist with the survey effort. Full details of survey methodologies employed are provided in Appendix III.

## 5 Site Description

- 5.1 Hafan Brynheulog comprises three units on a north-west to south-east alignment, with two projecting wings to the north-east. The building houses 36 self-contained flats, positioned adjacent to a small band of woodland to the south. The A474 just south of the site, divides Hafan Brynheulog from a large woodland expanse, through which flows the Upper Clydach River approximately 75m away. North of the site is an area of residential housing and associated gardens.
- 5.2 The building is constructed with brick and concrete block. It is made up of a mixture of mono-pitched and double-pitched roofs, that are covered with clay tiles. Hanging tiles cover the rear of a few of the mono-pitched roofs. Facia boards, capping at the roof edges, and soffits are plastic.
- 5.3 Only seven of the loft voids were accessed. These revealed the presence of a timber trussed rafter arrangement, fibreglass insulation, and a bitumen lining membrane.

## 6 Survey Constraints

- 6.1 All external parts of the building could be surveyed. Only seven loft voids were inspected due to the positioning of several loft voids above self-contained flats, where resident permissions were not possible.
- 6.2 No constraints were encountered during the dusk emergence/activity observations conducted in August and September 2025.

## 7 Desktop Study

- 7.1 The context of the site was considered with regard to statutory sites of nature conservation interest, such as Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SAC), National Nature Reserves (NNRs), and Local Nature Reserves (LNRs) etc. A single site of nature conservation interest was noted within 2km of Hafan Brynheulog; Frondeg SSSI. This SSSI is located approximately 1.5km to the north of the site, designated for its neutral grassland, fen-meadows and wet grassland. The development proposals are not considered likely to impact this designated site, due to the reasons for designation, distance from the site and the small scale proposed works.
- 7.2 A record search was commissioned from South-East Wales Biodiversity Records Centre (SEWBRc) which revealed numerous bat records and a number of bird records within a 2km radius of Hafan Brynheulog (LERC reference 0256-299). There are no records returned for the site itself. The closest bat record is of a common pipistrelle (*Pipistrellus pipistrellus*) around 250m to the north of the site. Other bat records around 300m from the site include soprano pipistrelle (*Pipistrellus pygmaeus*) and Whiskered/Brandt's (*Myotis sp.*). Further afield, over 500m from the site noctule (*Nyctalus noctula*) and brown long-eared (*Plecotus auritus*) bats have been recorded.
- 7.3 Within 1km of the site there bird records include blue tit (*Cyanistes caeruleus*), house sparrow (*Passer domesticus*), spotted flycatcher (*Muscicapa striata*), starling (*Sturnus vulgaris*), swift (*Apus apus*), great tit (*Parus major*), house martin (*Delichon urbicum*) and lesser black-backed gull (*Larus fuscus*).
- 7.4 Previous known survey at Hafan Brynheulog includes a Preliminary Roost Assessment and dusk observation surveys undertaken by Hawkeswood Ecology in 2016. At this time, a large number of droppings found around the lift shaft and lofts either side, suggested a pipistrelle maternity roost. During the dusk observation surveys, bats were noted emerging from the location of the suggested maternity roost but not in numbers that indicated nursery activity. A confirmed common pipistrelle roost was identified from a fascia on the main building. At the time a European Protected Species licence was not recommended.

## 8 Survey Results

- 8.1 Table 1 below summarises times and weather conditions when survey work took place, with wind speeds recorded using the Beaufort scale.

**Table 1: Summary of Survey Activity and Weather Conditions**

| Date             | Survey Type                                                                                                                               | Timing                                        | Weather Conditions                                                                                      |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|---------------------------------------------------------------------------------------------------------|
| 01/08/2025       | Daytime internal and external inspection including a (PRA) Potential Roost Assessment (PW, DW)                                            | 11.00 – 14.00 hours British Summer Time (BST) | Air temperature: 17°C<br>Cloud cover: 3/8 oktas<br>Wind speed: F3, gentle breeze<br>Conditions: Dry     |
| 11/08/2025       | Dusk emergence/activity observation (RM, CP, DW, LP)                                                                                      | 20.15 – 22:15 hours BST (Sunset 20.45 hours)  | Air temperature: 21-17°C<br>Cloud cover: 7/8 oktas<br>Wind speed: F2, light breeze<br>Conditions: Dry   |
| 14/08/2025       | Dusk emergence/activity observation (RM, CP, DW, PW)                                                                                      | 20.15 – 22:10 hours BST (Sunset 20.39 hours)  | Air temperature: 16-14°C<br>Cloud cover: 0/8 oktas<br>Wind speed: F1, light air<br>Conditions: Dry      |
| 02/09/2025       | Dusk emergence/activity observation (RM, CP, DW, PW, MA, BG)                                                                              | 19.30 - 21.30 hours BST (Sunset 20.01 hours)  | Air temperature: 16 - 14°C<br>Cloud cover: 8/8 oktas<br>Wind speed: F2, light breeze<br>Conditions: Dry |
| <b>Surveyors</b> | Robert Morgan (RM), Phoebe Williams (PW), Catherine Povey (CP), Megan Abrams (MA), Daniel White (DW), Ben Gibson (BG), Leigh Porter (LP). |                                               |                                                                                                         |

- 8.2 Assessment commenced with a visual inspection of Hafan Brynheulog in August 2025. Seven loft spaces were inspected. No live bats were seen, however, evidence of bats, by way of droppings were found. Table 2 provides a summary of the results.

**Table 2: Summary of PRA Results**

| Loft number | Loft Description (see Figure 3)                                         | Survey Findings                                                                                                                                                   | Notes                                                                                                      | DNA Results                             |
|-------------|-------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| 1           | Above lift shaft. No access points noticed in, light space with windows | No evidence of bats                                                                                                                                               | Not considered suitable for roosting bats. Space above is sealed with ceiling and a lack of access through | -                                       |
| 2           | West of lift shaft. Light coming in at the eaves (western side)         | Small collection of droppings near the hatch access                                                                                                               | Droppings were not collected, identified as the same noted within Loft 3                                   | -                                       |
| 3           | East of lift shaft                                                      | Collection of droppings near loft hatch at the south-east corner and south-west corner. Access between concrete blocks allow access between adjacent loft spaces. | Droppings collected                                                                                        | Serotine ( <i>Eptesicus serotinus</i> ) |
| 4           |                                                                         | Collection of approximately 30 droppings under sagged liner, near loft hatch                                                                                      | Droppings collected                                                                                        | Inconclusive                            |
| 5           |                                                                         | Small collection of approximately 10 droppings at north-east corner of the loft space                                                                             | Droppings collected.                                                                                       | Common pipistrelle                      |
| 6           |                                                                         | Small collection of approximately 5 pipistrelle droppings                                                                                                         | Droppings not collected                                                                                    | Identified as pipistrelle sp.           |
| 7           |                                                                         | Small collection of approximately 10 pipistrelle droppings by loft hatch                                                                                          | Droppings not collected                                                                                    | Identified as pipistrelle sp.           |

- 8.3 Droppings found within the loft spaces were noted to be of varying ages, both fresh and old droppings were found. Samples of the collected bat droppings were sent to SureScreen Scientifics for analysis. Two of the samples came back with a 100% match for common pipistrelle and serotine, as per the table above. One of the samples came back as inconclusive, these were retested, and again come back as inconclusive. DNA Analysis Results are shown in **Error! Reference source not found.I.**
- 8.4 Daytime assessment also included an external assessment of the building to note any Potential Roost Features (PRFs) for bats. No live bats or evidence of bats was found during the external assessment. A number of PRFs were noted:
- Gaps under lead flashing at the eastern wing;

- Gaps at the apex at the eastern wing;
  - Gap at the corner created by missing brickwork at the eastern wing;
  - Lifted roof tiles at the western end of the lift shaft roof;
  - Lifted uPVC capping across the building;
  - Gaps beneath uPVC soffit on the eastern wing, north and east elevations;
  - Lifted roof tiles at the southern elevation of the eastern wing;
  - Rotten timber soffits of the lift shaft section on the southern elevation;
  - Gaps beneath hanging tiles across the building.
- 8.5 The building was also assessed for its suitability for hibernating bats. No low-level features such as gaps, cracks or crevices below 1.5 metres were noted.
- 8.6 Summary of the dusk observation surveys provided in Table 3 below. For emergence locations, see Figure 2.

**Table 3: Summary of Dusk Observation Surveys**

| Date       | Surveyed Area                    | Observed Activity                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11/08/2025 | Central section and eastern wing | <ul style="list-style-type: none"> <li>• Common pipistrelle emerged from missing hanging tile at the north side of the central wing, at the north-east corner</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 14/08/2025 | Central section and western wing | <ul style="list-style-type: none"> <li>• Common pipistrelle emerged from missing hanging tile at the north side of the central wing, at the north-east corner</li> <li>• 4 x common pipistrelle bats emerged from beneath the roof capping and a gap at the top of the hanging tiles, at the southern corner of the site</li> <li>• Serotine emerged from a gap at the roof apex of the lower roof section adjacent to the lift shaft</li> </ul>                                                                                                                                                                                                                                                      |
| 02/09/2025 | Entire building                  | <ul style="list-style-type: none"> <li>• 2 x pipistrelle bats emerged from a gap in the apex at the south corner of Loft 2</li> <li>• 3 x common pipistrelle bats emerged from the apex beneath the roof capping and a gap at the top of the hanging tiles, at the southern corner of the site</li> <li>• Pipistrelle (likely common pipistrelle as previous) emerged from missing hanging tile at the north side of the central wing, at the north-east corner</li> <li>• Serotine bat emerged from a gap at the roof apex of the lower roof section adjacent to the lift shaft</li> <li>• Common pipistrelle emerged from the edge of the roof at the lift shaft, at the southern corner</li> </ul> |

- 8.7 NVAs were set up to assist and observe sections of the building where PRFs were noted. NVAs recorded several bats emerging across the survey period, results are shown in Tables 6-8 in Appendix V.
- 8.8 During the dusk observation surveys commuting and foraging bats were recorded. Species detected include common pipistrelle, soprano pipistrelle, noctule, serotine and a single brandt's bat.
- 8.9 Breeding birds were also considered during the PRA inspection undertaken in 2025. No active nests were found. A single old bird nest comprising a collection of sticks was noted within Loft 2.

## 9 Discussion and Conclusions

- 9.1 Survey conducted in 2025 confirms that Hafan Brynheulog is a bat roost; supporting common pipistrelle and serotine bats. Due to the emergence of a small number of bats from different locations across the building, and the lack of large accumulations of fresh droppings, roosts noted are considered to be summer day roosts. No evidence of maternity roosts were noted during the survey effort, although historic survey undertaken in 2016 noted the presence of a pipistrelle maternity roost due to the number of droppings found. It is not considered likely that this roost is still present, although such a roost may return any given year.
- 9.2 Two of the bats that emerged from the south-west corner of Loft 2 on the 2<sup>nd</sup> of September 2025, did not echolocate during the survey. Occasionally when bats emerge early on, often prior to sunset, they do not necessarily rely on echolocation for navigation when light levels are sufficient. As a result, although these bats were seen to emerge, a call was not captured. The experienced surveyor observing these emerging bats identified them as pipistrelles, due to their flight pattern and early emergence behaviour. This also corresponds with bats previously recorded at the site. Species level identification of these bats is not possible without a sonogram, thus, these emerging bats are noted as pipistrelle sp. A third pipistrelle bat was identified emerging from the missing hanging tile on the north side of the central section, at the north-east corner on the 2<sup>nd</sup> of September 2025. During the two prior dusk observations a single common pipistrelle bat was noted emerging from this exact

location. The bat that emerged from this location on the 2<sup>nd</sup> of September did not echolocate, consequently no recording was made. However, due to the pattern of previous emergences being common pipistrelle bats, this bat is considered likely to be the same bat and therefore considered to be a common pipistrelle.

- 9.3 Pipistrelle bats noted during the 2025 survey effort are using access points beneath missing hanging tiles, beneath lifted capping at the edge of the roof, and gaps at the roof apex. Pipistrelle bat droppings were also noted within lofts 5,6 and 7. No emergences were recorded from these lofts during the 2025 survey effort. It is likely that the features associated with these roof spaces are used on an occasional basis, and not in use at the time of the survey effort. Mitigation will be required for these loft spaces, to ensure bats can continue to roost, even where live bats were not recorded.
- 9.4 A serotine bat was recorded and seen to emerge from the south-east corner of Loft 3, from a gap at the apex. Droppings were found and collected from this loft, and were returned as a 100% match to serotine. Droppings consistent with serotine bats were also found in Loft 2. Gaps in the blockwork were noted and it is possible that these spaces are connected.
- 9.5 The impact of the re-roofing work will result in the disturbance and loss of unidentified pipistrelle, common pipistrelle and serotine day roosts. All bat species and their places of rest are fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), and the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019. The legal protection for bats concerns impacts from disturbance, loss of roost locations, modifications to roosts and loss of access or obstruction to roost locations. It will be necessary to apply to Natural Resources Wales (NRW) for a European Protected Species (EPS) licence.
- 9.6 Presence of bats at other times of year was considered. Serotine bats have been recorded using summer sites until autumn, and sometimes winter. There were no other hibernation opportunities noted during the survey effort and as a result the building is assessed to have low suitability for hibernating bats. Due to the presence of a single serotine bat during the dusk observation surveys, no hibernation surveys are recommended, instead sensitive working methods will be required as part of the licensed works. This will include the presence of a suitably qualified Ecological Clerk of Works to inspect targeted loft spaces prior to re-roofing works, and to supervise sensitive works.
- 9.7 Assessment of the importance of the roosts and Important Ecological Features (IEF) present, as outlined in the Bat Mitigation Guidelines (Reason & Wray, 2023) resulted in some of the following outcomes:

**Table 4: Assessment of Importance**

| Receptor                     | Number of bats | Roost type             | Geographical location | Rarity category | Assessed level of importance |
|------------------------------|----------------|------------------------|-----------------------|-----------------|------------------------------|
| Common pipistrelle           | 5              | Non-breeding day roost | South Wales           | Widespread      | Site                         |
| Serotine                     | 1              | Non-breeding day       | South Wales           | Widespread      | Site                         |
| Common / soprano pipistrelle | 2              | Non-breeding day roost | South Wales           | Widespread      | Site                         |

- 9.8 As the importance of the ecological receptors as outlined in Table 2 does not exceed 'Site' level, it is not considered that they qualify as 'Important Ecological Features' (IEF). Reason & Wray (2023) indicate that a rudimentary threshold of 'District' importance may be used to distinguish between receptor and IEF. No impact assessment is required for those receptors not identified as IEF, and therefore, no such assessment is conducted.
- 9.9 In alignment with the Bat Mitigation Guidelines (2023), an assessment of the importance of the bat assemblage is also conducted, as per Table 3.3 of the document. The score of the assemblage achieved is 5, which is lower than the minimum threshold of 18 required to achieve County importance. Therefore, it is not assessed that the assemblage of bats can be considered as important.
- 9.10 Similarly, as the development is not considered to be of a large scale, the assessment of the importance of the bat assemblage was not considered to be pertinent.
- 9.11 The survey effort in 2025 found no active bird nests. During the PRA nesting material was noted within Loft 2, this was an old nest with no signs of recent activity. Nothing was observed during dusk emergence activity observations to indicate birds are nesting at the site. All breeding birds are legally protected under the Wildlife and Countryside Act 1981 (as amended) and once a nest is established it is an offence to disturb or destroy the nest. Advice concerning birds is given below.

## 10 Recommendations

- 10.1 Hafan Brynheulog is a bat roost. The works to re-roof the building will result in impacts on bats and their roosts. Therefore, an application to NRW for an EPS licence is required. No work which has the potential to affect bat roost locations can commence until such time as a licence has been issued.
- 10.2 An EPS licence application for the proposed re-roofing works must be made to NRW. Under the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019, an EPS licence can only be issued if NRW are satisfied that:
  - there are imperative reasons of overriding public interest including those of a social or economic nature;
  - there is no satisfactory alternative, and;
  - the action authorised will not be detrimental to the maintenance of the population of the species at a favourable conservation status in their natural range.
- 10.3 A detailed Ecological Method Statement (EMS) must form part of the application, providing information on the survey effort with recent survey data not older than 18 – 24 months, details of the local status of the species concerned; the duties of an independent experienced Ecological Clerk of Works (ECW); as well as the duties and responsibilities of the various contractors and the owner/developer of the site. Post development monitoring will be required in **Year 2 and 3** following the completion of the re-roofing works.
- 10.4 To avoid detrimental impacts, a bat friendly timetable is necessary given the confirmed presence of a serotine roost and historic pipistrelle bat maternity roost. Works to the roof must be done within the period of 1<sup>st</sup> October to the 31<sup>st</sup> March to avoid disturbing bats during the summer breeding season. Works to roofs above lofts where serotine evidence was not found, can continue into April, but must be completed by the end of April.
- 10.5 A suitably qualified ecologist will need to be employed and present at the site as an Ecological Clerk of Works (ECW), to deliver a toolbox talk to contractors and supervise the removal of roof coverings in all areas where bats were identified to be roosting. The ECW must also undertake an internal inspection of targeted loft voids prior to re-roofing works (i.e. voids where the serotine bat is likely using). The ECW will also remain on call during unsupervised works.
- 10.6 As part of the licensing process short term and long term mitigation is required. For pipistrelle bat species an appropriate scheme of mitigation must ensure small gaps are provided within the building once the re-roofing works are completed. Where possible, features currently used by pipistrelle bats must be retained. Where this is not possible, these features must be re-created as part of the re-roofing works in close proximity to the existing roost locations. New features by way of access slots of dimensions 150mm length x 18mm height, must be provided to allow crevice roosting bats access to the wall plates. Access slots must be positioned flush with the wall. Where the creation of access points are not possible at gable end walls, bat access tiles must be used. In addition to the provision of features where emergences were noted, additional bat access tiles must be installed in the locations where pipistrelle bat droppings were noted during the PRA.
- 10.7 For serotine bat species the access point identified at the apex of the south-east corner of Loft 3 must be retained. It is recommended that an additional gap of 80mm x 22mm is provided in the roof of Loft 3 and 2 is provided, by way of a lead access point that sits amongst the roof tiles. A corresponding gap in the lining membrane must be cut (offset) to allow bats access into the loft space.
- 10.8 Modern breathable membranes (MBM) are often light in colour, and weight, with low thermal retention properties; they can sag into pockets and can have a smooth and shiny finish which offers no purchase to bats. Research has demonstrated that none of the MBM currently on the market are safe to use in bat roosts and that all present a potentially lethal threat to bats. **In this case the lining membrane beneath the roof MUST be a 1F bitumen liner throughout. If a breathable liner is installed, it will be necessary to remove it and replace with the correct liner.**
- 10.9 Bat friendly materials must be used with consideration for chemicals used for any treatment for the existing roof frame. Any application of remedial timber treatments must be applied by brush only and not sprayed as bats can be present within crevices of the timber frame and out of sight. New timbers must be checked to ensure that chemicals toxic to bats are not used. A list provided by England Nature is available (TIN092 dated February 2013).

- 10.10 Short mitigation includes the provision of a total of three Schwegler 1FF Bat Boxes, or equivalent, and a single 2FN Schwegler Bat box. These must be installed on site prior to commencement of EPS licence works. These bat boxes must be constructed with either woodcrete or wood-stone materials. Each bat box will act as receptor location for any bats found during the supervised soft strip removal of any roof coverings during the works. The bat boxes provided must be installed in a suitable location, preferably on natural linear features such as mature tree lines near to woodland. It will also provide additional long-term mitigation for the site by supporting extra roosting opportunities.
- 10.11 No issues of habitat fragmentation are identified within the development proposals at this site. Additional lighting is not considered likely at the site. However, it is important to note that any on-site lighting that is proposed does not deter bats from roosting, dispersing across the site and using the surrounding habitat for foraging purposes. It is therefore recommended that installation of any artificial lighting as part of the proposed plans is avoided where possible, unless considered critical for maintaining health and safety standards. If it is considered necessary, then it is recommended that any security lighting is kept to a minimum with luminaires motion-triggered and on a short timer of 15-20 seconds. The Institution of Lighting Professionals and Bat Conservation Trust have published 'Bats and Artificial Lighting at Night: Guidance Note 08/23' (ILP, 2023). This document presents many options for bat sensitive lighting and may be used to inform lighting considerations. Vegetated areas surrounding the site, including the adjacent woodland must not be lit.
- 10.12 Once a nest is established, the birds must be able to have access at all times until the young have fledged and the nest is no longer active. The bird breeding season commences as early as March for some species and continues to late August for species which rear a second or third brood. If an active nest is found, it must be retained and protected from disturbance. A cordon must be established for a safe working zone a suitable distance from the nest site, and not until the chicks have fledged can the nest be destroyed and the cordon taken down. To avoid nesting birds disrupting the development timetable, it is best for such work to be planned to avoid the breeding season.
- 10.13 Enhancements to support biodiversity are recommended at the site and are in-line with the small scale proposals. A suite of four bird boxes is recommended. A single Vivara Pro Seville 32mm WoodStone Nest Box, two Vivara Pro Seville 28mm WoodStone Next Boxes and a single Vivara Pro Barcelona WoodStone Open Nest Box must be installed at the site. Suitable locations for the nest boxes must be identified within the boundary of the site, which avoid predation by cats and avoid full sunlight. Boxes must be at least 3m off the ground, on a north/ north-easterly elevation.

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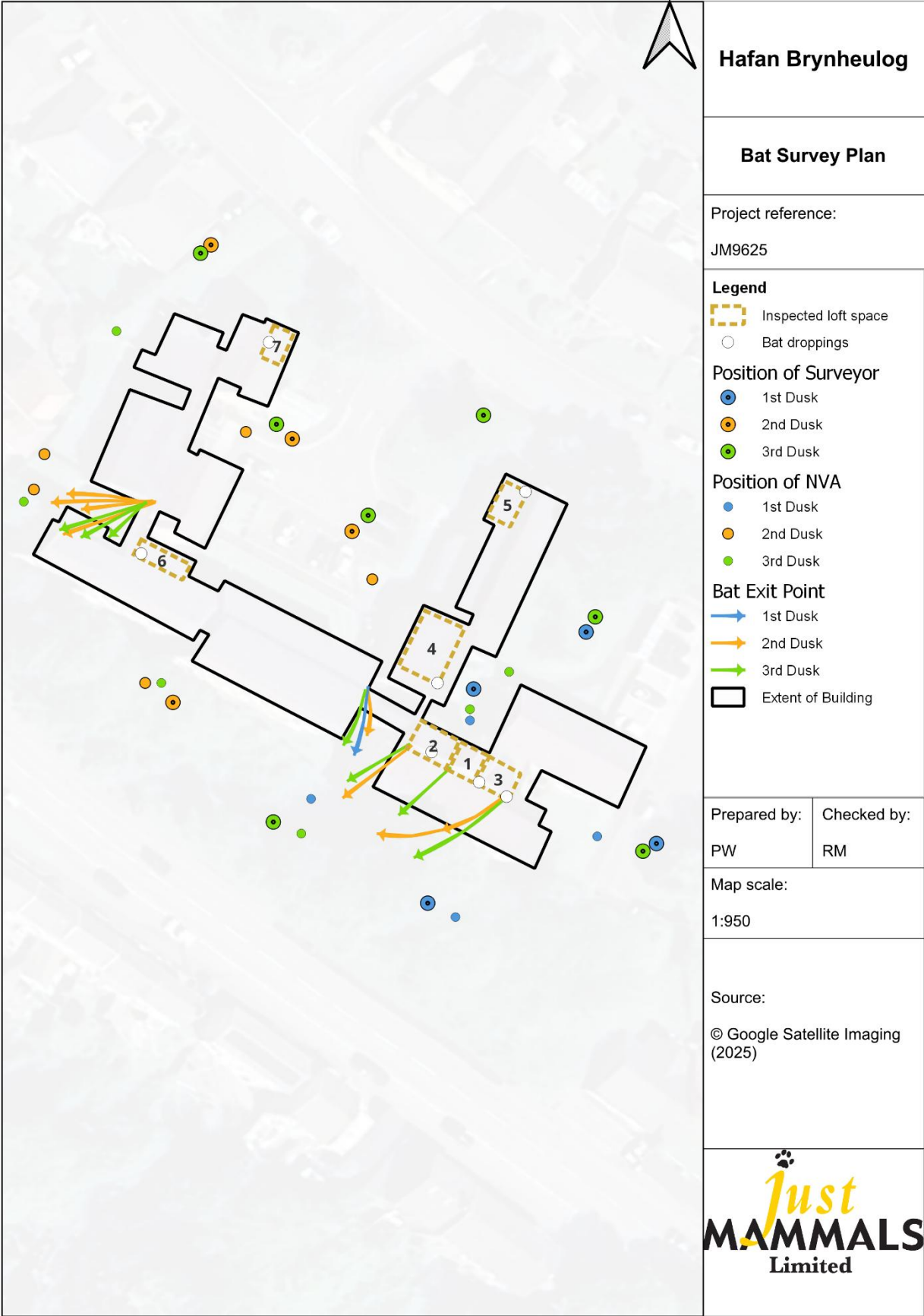
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Appendix I Site Plans

Figure 1: Aerial View of the Site



Figure 2: Bat Survey Plan



## Appendix II Survey Team Experience

**Table 5: Survey Team Experience**

| Name / Position                                          | Licences                                                            | Experience                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------------------|---------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Robert Morgan<br>Senior Ecologist<br>(Mammal Specialist) | <b>Bat (NRW)</b><br>S093965/1: expiry<br>9 <sup>th</sup> May 2026   | Over twenty years' experience with bats, carrying out Preliminary Roost Assessments (PRA), dusk emergence observations, dawn surveys, transects and hibernation surveys. During this time Rob has gained additional experience radio tracking lesser horseshoe bats, monitoring of important local sites, checking bat boxes, ringing Daubenton's and Greater horseshoe bats. Rob has expertise in respect of dormice with over 30 years' experience monitoring dormouse boxes/tubes voluntarily and commercially at various different sites. Assessing habitat suitability for dormice and conducting nut searches to help establish presence. Licenced to disturb barn owls listed under Schedule 1 of the Wildlife and Countryside Act 1981 since 2017. He has extensive surveying experience with great crested newts, amphibians, birds, badgers, marsh fritillary butterflies, otters, reptiles, and water voles. Extremely interested in all mammals from harvest mice to wild boar. |
| Phoebe Williams<br>Senior Ecologist                      | <b>Bat (NRW)</b><br>S093946/1: expiry<br>9 <sup>th</sup> April 2026 | Phoebe holds an MSc in Wildlife and Conservation Management and has over eight years' experience with ecological surveys for bats, great crested newts, badgers, reptiles and botany. Phoebe is currently employed as an Ecologist with Just Mammals Limited and is an Associate Member of the Chartered Institute of Ecology and Environmental Management (ACIEEM). She holds survey licences for bats and great crested newts in Wales.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Daniel White<br>Ecologist                                |                                                                     | Following qualification with distinction from the University of South Wales with an MSc in Wildlife and Conservation Management in 2021, Daniel joined Just Mammals Limited and is currently employed as an ecologist. As an enthusiastic herpetologist, Daniel has experience surveying for all widespread amphibian and reptile species in Britain, in addition to protected great crested newts and sand lizards. Beyond herpetofauna, Daniel has several field seasons experience surveying for badgers and bats, including aerial inspection of bat roosts, in addition to undertaking various botanical surveys. Daniel has recently been accepted as an Associate Member of the Chartered Institute of Ecology and Environmental Management (ACIEEM).                                                                                                                                                                                                                                |
| Catherine Povey<br>Assistant Ecologist                   |                                                                     | After graduating from Swansea University and UCL Catherine worked in medical research and as a practitioner. Since the first year of her degree when she studied Zoology and Botany, she has retained a keen interest in the natural world and has worked with Bannau Brycheiniog National Park on a number of projects including peat conservation. She is employed by Just Mammals Limited as an Assistant Ecologist and has conducted a variety of surveys with the company including dusk bat emergence surveys for commercial projects.                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Hayley-Anne Morgan<br>Trainee Ecologist                  |                                                                     | Hayley-Anne Morgan joined Just Mammals in 2023 as a survey assistant and progressed to trainee ecologist during March 2025, Hayley is currently studying a level 3 diploma in herpetology and is keen to gain her GCN licence. Hayley has practical experience in ECoW work and has assisted in surveying for newts, reptiles, water voles, nesting birds and more recently dormice. Since starting with just mammals in 2023 Hayley has assisted on many dusk emergence bat surveys and has recently started assisting on PRA visits. Hayley is a member of the amphibian and reptile conservation trust and volunteers with VWT assisting with bat roost monitoring for local horseshoe bat populations.                                                                                                                                                                                                                                                                                  |
| Ben Gibson<br>Survey Assistant                           |                                                                     | A graduate of Cambridge University in 2011 with a degree in Natural Sciences, he specialised in Plant Science in his final year studies. Surveyor with ten years' experience of undertaking bat surveys, flight line observations, census counts.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Megan Abram<br>Survey Assistant                          |                                                                     | A graduate from Plymouth University where she studied Animal Behaviour and Welfare: a postgraduate study followed at Cardiff University to examine raptor reintroductions to Wales. She has completed a 3 month placement with North Wales Wildlife Trust and also a 3 month placement at Cikananga Wildlife Rescue Centre. Megan has participated in paid and voluntary work with a variety of nature conservation and ecological consultancy organisations gaining useful experience of native habitat and species protection. She is currently employed as a survey assistant with Just Mammals Limited.                                                                                                                                                                                                                                                                                                                                                                                 |
| Leigh Porter<br>Survey Assistant                         |                                                                     | Leigh's enthusiasm and knowledge of all things wildlife is mainly self-taught. He is particularly interested in mammals and birds and is always looking to develop his knowledge further. Leigh previously volunteered with Vincent Wildlife Trust (VWT) assisting with bat counts of known roosts in Mid Powys. He is keen to improve skills in the environment and conservation sector and so became a survey assistant with Just Mammals in Spring 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

## Appendix III Survey Methodologies

With respect to bats, all outer surfaces of the building were examined from the ground seeking signs of use, including bat faeces (droppings) on walls, ledges, doors and sills. Urine staining on paintwork and window glass, or staining on the surfaces of exposed timbers caused by oil from bat fur were also searched for. A high-powered lamp and binoculars were used to examine Potential Roost Features (PRFs), and any gaps or crevices in the structure were inspected as closely as possible. The context of the building within the surrounding landscape was also assessed at this time.

Internal survey sought the presence of bats or the remains of dead bats (including dead juvenile bats and babies), which might indicate the presence of a maternity roost, and other roosting signs (e.g. droppings), on floors, ledges, walls, stored items, and other surfaces. The roof structure and loft void were inspected for live bats or evidence for their presence, including discarded fragments of insects such as moth wings.

Low-level gaps, cracks and crevices, particularly on north-facing elevations were also sought and inspected, to consider the potential for presence of hibernating bats.

The presence of nesting birds was also considered at the time of assessment. Surveyors recorded any signs of historic and current bird activity including nest-building, feeding at nest sites and any indirect evidence such as nest remains, bird droppings, and feathers.

Survey effort to identify the presence of roosting bats was designed with reference to the Bat Conservation Trusts (BCT) Bat Survey Good Practice Guidelines (Collins 2023), specifically targeting the level of suitability for day roosting bats. If presence had been confirmed, this type of survey also allowed surveyors to count the number of roosting bats, identify species and determine the roost location and key access points.

Surveyors (see Table 5) were positioned at strategic vantage points to obtain maximum coverage of the building during the observation. Surveyors recorded bat activity, particularly focussed their attention on whether bats emerged from the eastern end of the house, whilst documenting the time, bat species and behaviour. Sunset times were established on site using a hand-held geo positioning system (GPS), and observers were able to communicate with each other using walkie talkie radio sets.

Surveyors were equipped with Pettersson D-240X machines. These devices are particularly sensitive and excellent at separating species which employ the middle range frequencies for foraging (45 – 55 kHz). They are therefore very good at identifying the different pipistrelle species (*Pipistrellus* sp.), and the different myotis bats\* (*Myotis* sp.) (\*myotis bat is a collective term used where the species could not be specifically identified beyond this broad group). The myotis group encompasses seven species of British bat including Alcathe's (*Myotis alcathoe*); Bechstein's (*M. bechsteinii*); Brandt's (*M. brandtii*); Daubenton's (*M. daubentonii*); greater mouse-eared (*M. myotis*); Natterer's (*M. nattereri*); and whiskered bat (*M. mystacinus*).

The Pettersson D-240X machine can be used in heterodyne or time expansion modes and for the purposes of this survey, only the time expansion facility was used. The received signals were then recorded to Roland RO-5, recording devices for later analysis. The time expansion method is similar to making a high-speed tape recording of a bat's ultrasonic call and then playing it back at a slower speed. Digital technology is used to make the recording and slow it down for play back. Since the signal is stretched out in time, it is possible to hear details of the sound not audible with other types of detector.

Time expansion is also the only technique which preserves all characteristics of the original signal, which makes time expanded signals ideal for sound analysis. In addition to the simple echo-location calls which can be used for commuting, enabling the bat to find its way about, bats will also produce feeding 'buzzes' when foraging. These buzzes occur when the bat closes in on its prey and are a consequence of the Doppler Effect, which results in a feeding 'buzz' as the reflected signal shortens when the animal approaches its prey. Such buzzes are used to assess the importance of an area for foraging. The recorded echo-location calls are then interpreted using BatSound sound analysis software. By use of the software it is possible to separate the different species by analysis of the sonograms produced.

Night Vision Aids (NVAs) were utilised in order to complement the emergence data gathered by trained observers. Digital video cameras with night-shot / infrared capability, along with ancillary infrared illumination and Guide Tk612 Gen2 Thermal Imaging Monoculars were used to assist with the survey effort. Static Song Meter SM4 detectors were used to capture bat survey data at each NVA location. Please refer to the survey plans in the appendices for further information on where the equipment was deployed.

## Appendix IV Site Photographs

Plate 1: Front northern elevation of Hafan Brynheulog



Plate 2: North-west corner of the site



Plate 3: Northern corner of the site



Plate 4: Serotine exit point at south-east corner of site



Plate 5: Looking west at the western wing



Plate 6: Serotine droppings inside Loft 3



Plate 7: Emergence point of common pipistrelle bats

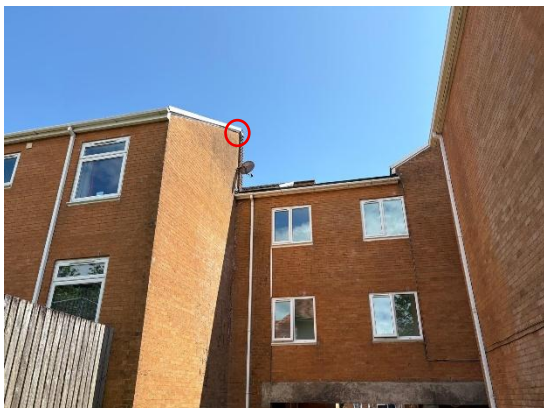


Plate 8: Interior of loft

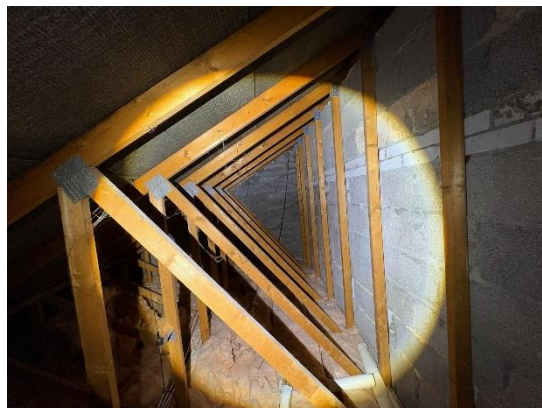


**Plate 9: Interior of void around lift shaft**



**Plate 10: Interior of loft space 3**



**Plate 11: Bat droppings inside Loft 4**



**Plate 12: Sagged liner within Loft 4**



## Appendix V Dusk Observation Results

**Table 6: Hafan Brynheulog – Dusk Observation 11<sup>th</sup> August 2025 (Emerging Bats)**

| Time (24 Hour Clock) | Species (Common Name) | Recording No. | Observed Activity                                                                                           |
|----------------------|-----------------------|---------------|-------------------------------------------------------------------------------------------------------------|
| 20.58 hours          | Common pipistrelle    | RM            | Emerged from missing hanging tile at the north side of the central wing, at the north-east corner (Plate 1) |

**Table 7: Hafan Brynheulog – Dusk Observation 14<sup>th</sup> August 2025 (Emerging Bats)**

| Time (24 Hour Clock) | Species (Common Name)  | Recording No. | Observed Activity                                                                                                                            |
|----------------------|------------------------|---------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| 21.03 hours          | Common pipistrelle     | RM, NVA       | Emerged from missing hanging tile at the north side of the central wing, at the north-east corner (Plate 1)                                  |
| 20.53 hours          | Common pipistrelle x 2 | NVA (SM4)     | Emerged from the apex beneath the roof capping and a gap at the top of the hanging tiles, at the south-west corner of the site (see Plate 7) |
| 21.02 hours          | Common pipistrelle     | NVA (SM4)     | Emerged from a gap in the lifted roof capping above the hanging tiles at the south-west corner of the site (see Plate 7)                     |
| 21.03 hours          | Common pipistrelle     | NVA (SM4)     | Emerged from a gap in the lifted roof capping above the hanging tiles at the south-west corner of the site (see Plate 7)                     |
| 21.15 hours          | Serotine               | RM            | Emerged from a gap at the roof apex of the lower roof section adjacent to the lift shaft (see Plate 4)                                       |

**Table 8: Hafan Brynheulog – Dusk Observation 02<sup>nd</sup> September 2025 (Emerging Bats)**

| Time (24 Hour Clock) | Species (Common Name)  | Recording No. | Observed Activity                                                                                                                          |
|----------------------|------------------------|---------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| 19.54 hours          | Pipistrelle sp.        | RM            | Emerged from a gap in the apex at the south-west corner of Loft 2                                                                          |
| 19.58 hours          | Pipistrelle sp.        | RM            | Emerged from a gap in the apex at the south-west corner of Loft 2                                                                          |
| 20.07 hours          | Common pipistrelle x 2 | NVA (SM4)     | Emerged from the apex beneath the roof capping and a gap at the top of the hanging tiles, at the southern corner of the site (see Plate 7) |
| 20.07 hours          | Pipistrelle sp.        | RM            | Emerged from missing hanging tile at the north side of the central wing, at the north-east corner (Plate 1)                                |
| 20.09 hours          | Common pipistrelle     | NVA (SM4)     | Emerged from the apex beneath the roof capping/ gap at the top of the hanging tiles, at the southern corner of the site (see Plate 7)      |
| 20.13 hours          | Serotine               | BG, RM        | Emerged from a gap at the roof apex of the lower roof section adjacent to the lift shaft (see Plate 4)                                     |
| 20.20 hours          | Common pipistrelle     | NVA (Thermal) | Possible emergence from the edge of the roof at the lift shift, at the southern corner                                                     |

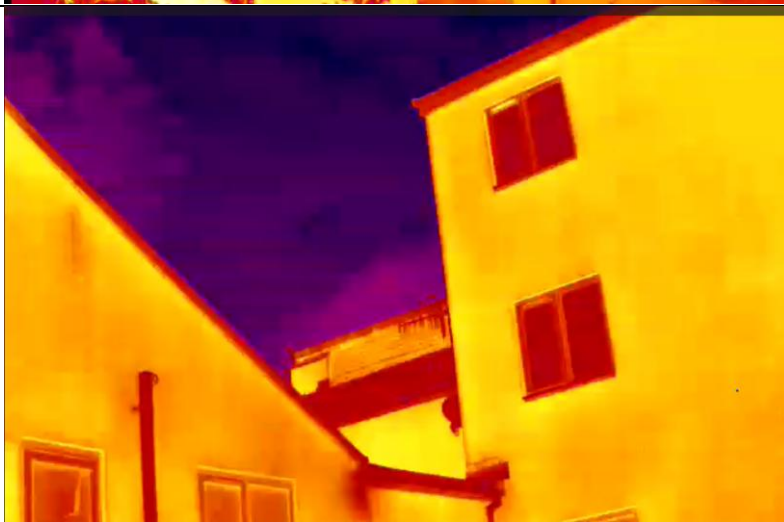
**Table 9: Hafan Brynheulog – Bat Analysis**

| Date/Night | Time/Hours    | Species (Common name) | Call Count |
|------------|---------------|-----------------------|------------|
| 11/08/2025 | 20.00 – 21.00 | Noctule               | 2          |
|            |               | Common pipistrelle    | 11         |
|            | 21.00 – 22.00 | Noctule               | 17         |
|            |               | Common pipistrelle    | 77         |
|            |               | Soprano pipistrelle   | 13         |
|            |               | Serotine              | 1          |
|            | 22.00 – 23.00 | Noctule               | 1          |
|            |               | Soprano pipistrelle   | 2          |
|            |               | Common pipistrelle    | 2          |
| 14/08/2025 | 20.00 – 21.00 | Noctule               | 1          |
|            |               | Common pipistrelle    | 7          |
|            | 21.00 – 22.00 | Noctule               | 18         |
|            |               | Serotine              | 2          |
|            |               | Common pipistrelle    | 4          |
|            |               | Soprano pipistrelle   | 1          |
|            |               | Brandt's              | 1          |
| 02/09/2025 | 19.00 – 20.00 | Common pipistrelle    | 4          |
|            |               | Soprano pipistrelle   | 4          |
|            |               | Noctule               | 17         |
|            | 20.00 – 21.00 | Noctule               | 17         |
|            |               | Common pipistrelle    | 266        |
|            |               | Soprano pipistrelle   | 94         |
|            | 21.00 – 22.00 | Serotine              | 1          |
|            |               | Common pipistrelle    | 168        |
|            |               | Soprano pipistrelle   | 24         |
|            |               | Noctule               | 3          |

**Table 10: View from NVA devices**

| NVA location                | Image                                                                                |  |
|-----------------------------|--------------------------------------------------------------------------------------|--|
| Observation 1<br>11-08-2025 |    |  |
| Observation 1<br>11-08-2025 |   |  |
| Observation 1<br>11-08-2025 |  |  |
| Observation 1<br>11-08-2025 |  |  |

|                                     |                                                                                      |  |
|-------------------------------------|--------------------------------------------------------------------------------------|--|
| <p>Observation 2<br/>14/08/2025</p> |    |  |
| <p>Observation 2<br/>14/08/2025</p> |    |  |
| <p>Observation 2<br/>14/08/2025</p> |   |  |
| <p>Observation 3<br/>02/09/2025</p> |  |  |
| <p>Observation 3<br/>02/09/2025</p> |  |  |

|                                     |                                                                                      |  |
|-------------------------------------|--------------------------------------------------------------------------------------|--|
| <p>Observation 3<br/>02/09/2025</p> |    |  |
| <p>Observation 3<br/>02/09/2025</p> |    |  |
| <p>Observation 3<br/>02/09/2025</p> |   |  |
| <p>Observation 3<br/>02/09/2025</p> |  |  |

## Appendix VIDNA Analysis Results

Folio No: 3980-2025  
 Purchase Order: JM9625  
 Contact: Just Mammals Limited  
 Issue Date: 29.08.2025  
 Received Date: 14.08.2025



# Biological Sample Analysis

## Summary

Most biological materials (tissue, feces, hair, blood, etc.) contain small amounts of DNA from the organism of which it originated. Using molecular methods such as PCR (polymerase chain reaction) and DNA sequencing, SureScreen Scientifics are able to analyze an unknown sample to determine which species the sample originates from our methods are optimized for the detection of species including bats (over 92% of bat species worldwide can be identified including all 18 UK bat species), mammals; bees, wasps & hornets; birds; fish; plants (from roots, leaves, stem and even dried wood) and many more species.

## Results

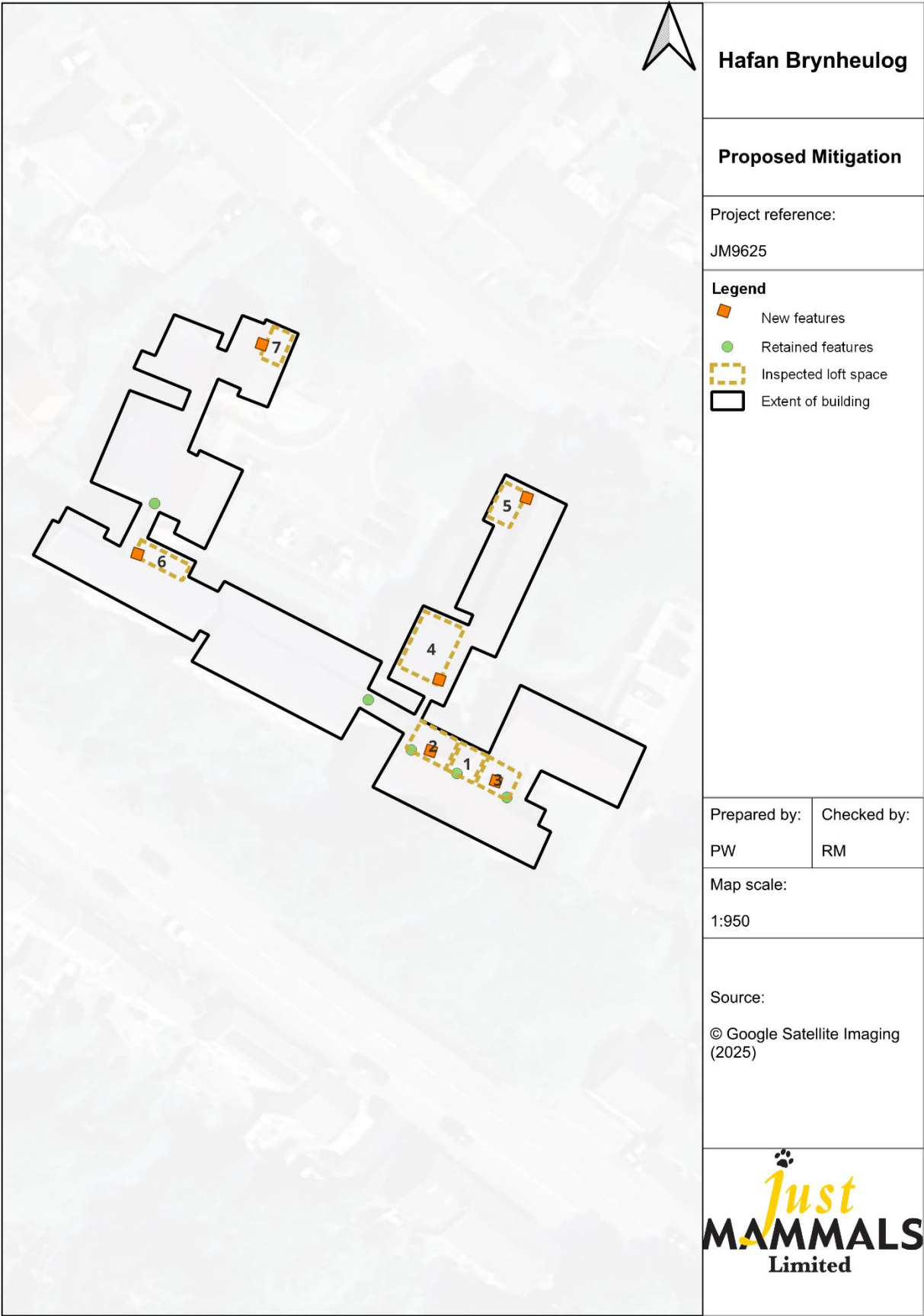
| Lab ID                                                                                                                                                                                                                          | Site Name                                | OS Reference      | Sample Type  | Species Name                                         | Match(%) |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------|--------------|------------------------------------------------------|----------|
| B5311                                                                                                                                                                                                                           | Hafan Brynheulog,<br>Pontardawe - loft 5 | SN 71893<br>04295 | Bat Dropping | Common pipistrelle<br>(Pipistrellus<br>pipistrellus) | 100.00   |
| <b>Genetic Sequence</b><br>TAATTGGAGGATTGGAAGTACTAGTTCCTACTAATAATTGGAGCCCTGACATGGCATTTCCTCGTATAAATAATAT<br>AAGTTTCTGACTCCTACCTCCTCTTTCTACTACTAGCCCTGCTATAGTAGAAGCGGGAGCGGGTACAGGCT<br>GAACAGTCTACCCCTCTAGCAGGAAA                |                                          |                   |              |                                                      |          |
| B5312                                                                                                                                                                                                                           | Hafan Brynheulog,<br>Pontardawe - loft 4 | SN 71893<br>04295 | Dropping     | Inconclusive - awaiting<br>re-test                   | -        |
| <b>Genetic Sequence</b><br>-                                                                                                                                                                                                    |                                          |                   |              |                                                      |          |
| B5313                                                                                                                                                                                                                           | Hafan Brynheulog,<br>Pontardawe - loft 3 | SN 71893<br>04295 | Bat Dropping | Serotine (Eptesicus<br>serotinus)                    | 100.00   |
| <b>Genetic Sequence</b><br>TATAATTGGGGGCTTTGGAATTGATTAGGTGCCTTTAATAATCGGAGCTCCTGATATAGCATTCCACGAATGAAC<br>AATATAAGCTTCTGACTCCTCCTCCCTCTTCTACTTCTCTAGCATCATCTATGGTAGAGGCCGGGGCTGGCAC<br>TGGTTGGACAGTCTACCCCTTTGGCAGGAAACCTAGCACA |                                          |                   |              |                                                      |          |

Matters affecting result: none  
 Reported by: Consuela Sopronyi

Approved by: Lauryn Jewkes

Appendix VII Mitigation

Figure 3: Proposed Mitigation Plan



## Appendix VIII Ecology of British Bats

There are at least 18 species of bats breeding in Britain. Most of them are regarded as threatened due to a variety of factors including habitat loss, intolerance and disturbance/damage or loss of roosts. Of these species a number regularly use buildings at certain times of year in order to find safe secure roost sites. Often several different species can use a building over the course of the year, and not all species are present at the same time, making assessment of their presence complex.

Bats are highly mobile flying mammals, which in Britain, feed entirely on insects. They have evolved over seventy million years and have developed sophisticated mechanisms to allow them to effectively 'see' in the dark by using sound waves. This system is called echo-location which enables them to track and hunt down small moving insects whilst in flight, rather like radar does in a modern military fighter aircraft. It is possible to record this sound, and because each species of bat echo-locates in a different way, determine what the species is without actually handling the animal which made the call.

In winter, when their prey is scarce, British bats hibernate or enter torpor, in cool parts of caves, buildings (cavity walls), and tree cavities. They may wake occasionally and will feed if evening temperatures are greater than 7°C, when flying insects can be active. Generally, however, activity during cold winters is very limited and bats only become fully active in spring, with late March and early April being a critical time for animals desperately trying to save energy whilst gaining weight. Disturbance during these months can therefore be more devastating to bats than at other times of year.

By late spring female bats will gather together in maternity roosts in order to give birth and rear their single baby in June. Such maternity roosts are often near to important foraging areas in order to save energy as flight requires vast energy resources. Flight routes to and from such roosts can therefore also be important and some bats are extremely light averse preferring dark locations without street or security lamps which can force them to take complex routes to reach foraging areas. Such lighting can also badly degrade foraging areas where they occur close to buildings and hedgerows and tree lines can be particularly important areas for bat foraging to take place particularly when close to the roost building.

Whilst females form maternity colonies, usually in warmer roofs or trees, male bats tend to seek out cooler sites which may not be so close to the foraging areas. Males are often solitary and do not exhibit the social behaviour that marks out females during the birthing period. Non-breeding females will also roost in this way, when they have no need to spend energy on raising a single baby.

Several British bat species are known to rely heavily on buildings to roost. Of these species, the most likely are the soprano pipistrelle bat and the common pipistrelle. Other bat species regularly found in buildings are the brown long-eared bat; Natterer's bat; Brandt's bats and whiskered bat. Pipistrelle species and the small myotis or mouse-eared species (Brandt's, whiskered etc) often favour locations at the ridge or around the exterior shell of the structure. Brown long-eared and Natterer's bats tend to prefer living within the roof area of a building – large lofts being popular.

Other species that are known to use the internal areas of built structures such as barns include the two horseshoe species, the greater horseshoe bat (*Rhinolophus ferrumequinum*), and lesser horseshoe bat, as well as western barbastelle bat (*Barbastella barbastellus*).

## Appendix IX Relevant Legislation

### Bats

All species of bat in Britain, and their places of rest are protected under the provisions of the Wildlife and Countryside Act 1981 (WCA), Section 9(1), 9(4)(a) and 9(4)(b) as amended by Schedule 12 of the Countryside and Rights of Way Act 2000. Further protection is afforded by the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019. In relation to structures used by bats for shelter or protection (i.e. roosts), this legislation makes it an offence to either intentionally or recklessly damage, destroy or obstruct access to any site used by bats, whether bats are present at the time or not, or to intentionally or recklessly disturb bats within a roost.

Infringements under this legislation include building demolition, removal of hollow trees, blocking, filling or installing grills over old mines or tunnels, building alteration or maintenance work, re-pointing of stone walls, getting rid of unwanted bat colonies, re-roofing, remedial timber treatment, re-wiring or plumbing in roofs, treatment of wasps, bees or cluster flies (Mitchell-Jones, 1992; Childs, 2001). Greater horseshoe bat, lesser horseshoe bat, Bechstein's bat, greater mouse eared bat and barbastelle are included in Annex II of the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019 and hence require special protection.

Maximum penalties for committing offences relating to bats or their roosts can amount to imprisonment for a term not exceeding six months or to fines of up to Level 5 on the standard scale under the Criminal Justice Act 1982/1991 (i.e. £5000 in April 2001) per roost or bat disturbed or killed, or to both. Bodies corporate and their directors/secretaries are liable for offences under the 2017 Regulations and the WCA. Additionally, where such an offence results in the offender benefitting in a monetary form from the illegal action, confiscation or civil recovery of the proceeds can occur under the Proceeds of Crime Act 2002.

It is sensible to assess as soon as possible if bats are present at potential sites for development – preferable before the land is acquired. In some cases the period required for adequate survey work may span more than one calendar year. If a development, including demolition or change of use, is likely to impact on bats and their roosts then a licence will usually be required. Adequate survey results are a necessary input to any licence application.

The law with respect to dwellings and other structures is applied equally. Where disturbance is deemed likely to have a significant effect on bats to survive, breed and rear their young or will affect the local distribution and abundance of the species, a European Protected Species licence issued by Natural Resources Wales. A licence application must demonstrate that the development will not be detrimental to the maintenance and conservation status of the species concerned.

This explanation must be regarded only as a guide to the law. For further details, reference must be made to the Wildlife and Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019, and the Countryside and Rights of Way Act 2000.

### Wild birds

All wild birds, their eggs and nests are protected by The Wildlife and Countryside Act 1981 (as amended). It is an offence, with certain exceptions, to:

- intentionally kill, injure or take any wild bird;
- intentionally take, damage or destroy the nest of any wild bird while it is in use or being built;
- intentionally take or destroy the egg of any wild bird;
- sell wild birds or put them on display for sale;
- use traps or similar items to kill, injure or take wild birds; and
- intentionally or recklessly disturb any wild bird listed on Schedule 1 while it is nest building, or at a nest containing eggs or young, or disturb the dependent young of such a bird.

Penalties that can be imposed for criminal offences in respect of a single bird, nest or egg contrary to the Wildlife and Countryside Act 1981 (as amended) is an unlimited fine, up to six months imprisonment or both. In exceptional cases NRW and Natural England issues licences for specific purposes, so that legitimate work may be undertaken without breaking the law.

## **Appendix X EPS Licensing**

Under the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019 a licence can only be issued if Natural Resources Wales are satisfied that:

- there are imperative reasons of overriding public interest including those of a social or economic nature;
- there is no satisfactory alternative, and;
- the action authorised will not be detrimental to the maintenance of the population of the species at a favourable conservation status in their natural range.

Natural Resources Wales will require a copy of the full planning consent, as well as an explanation of why there is a need to carry out the proposed work and what alternative solutions have been considered (e.g. other sites) and why they have been discounted. The alternative of retaining the roost within the development must be considered. The last point will depend on the possibility of implementing appropriate mitigation and on assurances that it can be and will be carried out and maintained and the results monitored. Natural Resources Wales aim to process applications within 30 working days, but in practice licences often take longer depending on the number of applications being processed at any one time. NRW now charge for issuing a European Protected Species licence, this fee depends on the project's complexity, the size of the development and species involved. Unless a waiver applies to the proposed work. Details of the fees can be found online via Natural Resources Wales.

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## **Natural Problem Solvers**

Just Mammals Limited, Suite 131-136, Plas y Ffynnon, Cambrian Way,  
Brecon LD3 7HP Tel: 01874 623616