



CelticEcology
and Conservation Ltd

BAT SURVEY

BUILDINGS AT PENLENLAS FARM, ABERGAVENNY

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Proposed Development: Buildings at Penlenlas Farm, Abergavenny

Bat Survey

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Drawings

Number	Title
6225/22/04	Proposed elevations

(NOTE: all drawings submitted separately with the planning application)

NON-TECHNICAL SUMMARY

An initial building inspection and subsequent emergence survey was carried out of an amenity property, Penlenlas Farm on Old Hereford Road, Abergavenny, Monmouthshire, south Wales between March and May 2022.

A building inspection in respect of bats in March 2022 identified a number of potential access points into the outbuildings that bats could use and three old droppings commensurate with pipistrelle bat species. The building was therefore considered to be a probable roost.

As a result of the building inspection, it was therefore recommended that a series of activity surveys should be undertaken to determine the levels of bat activity in the area and whether or not the buildings are used. Therefore, two dusk emergence surveys were carried out in May 2022 in accordance with current survey guidelines and best practice, to determine whether or not bats were present, the species concerned, in what numbers, for what purpose they are using the building and what mitigation might be required. The survey was carried out in accordance with current guidance on standards of survey for bats (Collins (Ed) Bat Conservation Trust (BCT) 2016).

No bats were seen to emerge from, return to or take any interest in the building.

Low numbers of common pipistrelle and noctule bats were heard and seen during the surveys.

It is therefore considered that the outbuildings at Penlenlas Farm on Old Hereford Road are not currently used by bats for roosting purposes.

It is considered that, as no bats were observed using the buildings, a Natural Resources Wales (NRW) development licence with an accompanying method statement detailing appropriate mitigation will not be required prior to the commencement of any conversion work to the building.

However, it is a requirement that a suitably licensed and experienced ecologist be on site when works to remove the roof are carried out. However, if at any point should any new evidence of bats be observed, works will cease and an ecologist or Natural Resources Wales be consulted immediately. Works may only resume on receipt of written confirmation from either the ecologist or NRW. Further surveys may be required.

An ecologist will be “on call” for the duration of the project in the event that bats are encountered at a later date.

Mitigation will not be required.

Enhancements to benefit bats are required.

Seasonal and materials constraints will not apply to the demolition.

1 INTRODUCTION

1.1 BACKGROUND

A building inspection was undertaken in March 2022 by Celtic Ecology and Conservation Ltd. of two outbuildings at Penlenlas Farm, on Old Hereford Road in Abergavenny in south Wales.

During this inspection, three old bat droppings commensurate with pipistrelle species bats was observed. No other evidence of bats was observed. A number of potential bat access points were noted.

Celtic Ecology and Conservation Ltd. recommended, and was commissioned to undertake a series of dusk emergence activity surveys of the building.

This survey report therefore details the findings of the bat survey visits undertaken in May 2022 and provides an assessment of bat activity at the site.

No bats were found to be using the building during the survey visits despite bats being observed in close proximity to the building. As such, a development licence will not be required.

The surveys were carried out in accordance with current guidance on standards of survey for bats (Bat Conservation Trust, 2016¹) as required by Natural Resources Wales (NRW) and Monmouthshire County Council (MCC).

1.2 SITE DESCRIPTION

Penlenlas Farm is located in a wholly rural environment on Old Hereford Road on the northern edge of Abergavenny in Monmouthshire in south Wales (National Grid Reference SO 30351627; **Figures 1 & 2**).

The subjects of the survey were two connected outbuildings: Buildings 1 & 2 (Plates 1 – 3).

At the western end of the two buildings, Building 1 is the smaller of the two. It has a stone western gable end wall, block and asbestos sheet northern wall and a timber southern wall, single storey former stable under a metal sheet roof, the ridge of which is oriented east – west. Building 2 is the eastern one is also stone built but of 1.5 storeys under a slate roof, the slate ridge of which is also oriented east – west.

Externally, timberwork (fascias, bargeboards etc.) where present are in a poor condition with multiple holes in them, multiple visible gaps between the roof structure and the walls. The roofs, albeit they are old and in need of updating, are intact and without holes leaving the buildings below dry. There are a number of slipped, raised and missing slates, with more on the northern pitch.

¹ *Bat Surveys for Professional Ecologists - Good Practice Guidelines* (Collins, J (Ed). BCT, 2016)

Internally, Building 1 has a ceiling with a screwed shut access into the void above to which there was no access (Plate 4). Windows and doors are on the southern elevation.

Building 2 is open from floor to ridge (Plate 5) with a hay loft over part of the ground floor (Plate 6). The roof is of a traditional purlin and rafter construction and is lined with bituminous felt. There are a number of windows, with the exception of one under the apex of the western gable end, all are at ground floor level and are glazed. The doors are on the southern elevation with timber doors, one leaf of which has a hole made specifically for access for the farm cats.

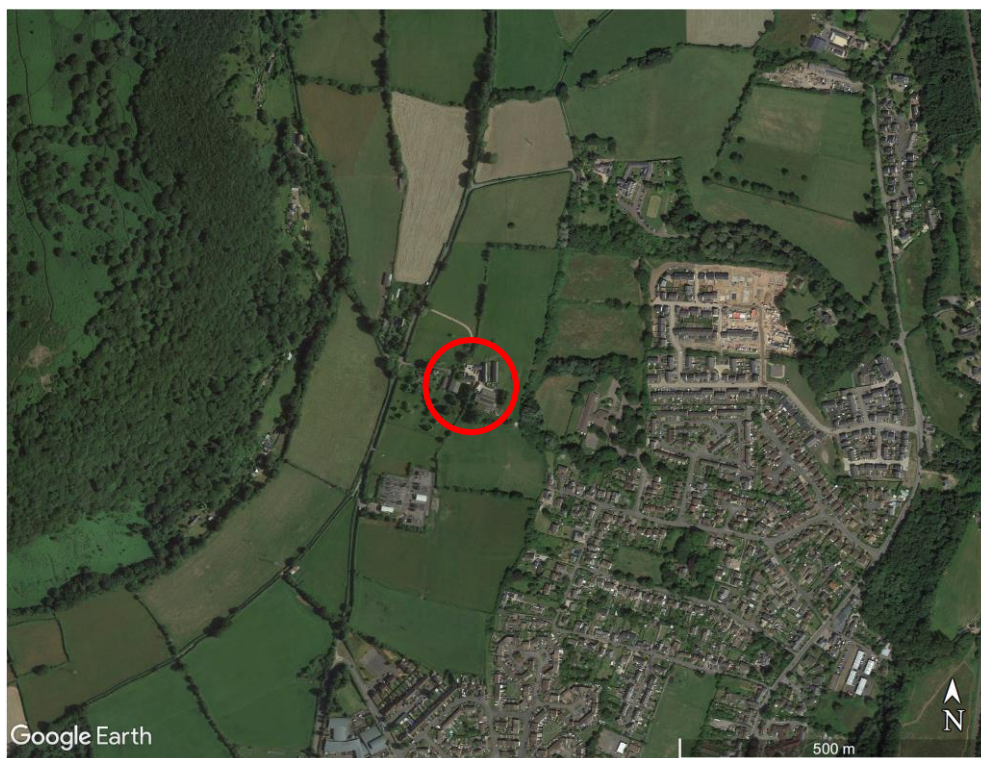
Buildings 1 and 2 are used for general storage.

There was a single storey link structure between Building 2 and the adjacent agricultural barn (Plate 7 & 8); this structure was a single storey under a stone tile roof. In need of repair. It has most recently been used for housing sheep.

The property is located on the northern edge of Abergavenny on Old Hereford Road. The farm house and other agricultural buildings are located immediately to the south and east of the buildings. It is set on a small holding currently used for sheep and horse grazing, the fields being delineated by mature hedges and standard trees.

The wider landscape is dominated by pastoral fields, woods, rivers and with upland areas to the north.

Figure 1 - general aerial view of Penlenlas Farm (circled red)



(Image courtesy of Google Earth)

Figure 2 - detail of Penlenlas Farm (buildings outlined red & numbered; link building location outlined yellow)



(Image courtesy of Google Earth)

1.3 SURVEYOR INFORMATION

The building inspection was undertaken by Hugh Dixon (NRW license number: S085813-1). Hugh has held an all counties bat survey licence in Wales since 2008. He also holds a level 2 survey licence for all counties in England (licence number: 2015-15256-CLS-CLS)), undertaking numerous bats surveys for commercial and voluntary purposes, dealing with a wide range of species and situations. Hugh has held CCW / NRW and Natural England development licences for a range of species and designed and implemented mitigation and monitoring.

Assisting with the activity surveys were Jordan Fox and Isabella Stephens who have both worked with Hugh on a regular basis since 2016 undertaking bat (and other ecology) surveys.

2 ECOLOGY

2.1 BATS

British bats are small flying nocturnal mammals that feed exclusively upon insects. There are 17 species resident in Britain, ranging in size from the small pipistrelle species up to the larger noctule (*Nyctalus noctula*), serotine (*Eptesicus serotinus*) and greater horseshoe bat (*Rhinolophus ferrumequinum*). Bats are active from April through to October and hibernate when insects are in short supply in the winter months. Bats emerge from hibernation in late March - early April and move into their transition / intermediary roosts. Female bats will move to maternity sites by the beginning of May and will give birth to a single baby between June and early July. The baby is reared solely by the mother and is weaned and independent by end of August. After breeding, bats move to transition / intermediary roosts and females will visit males at mating roosts. During the autumn, bats feed voraciously to gain weight for the hibernation ahead.

Although traditionally trees, caves and rock faces were used by roosting bats and are still used, many different structures are used nowadays by bats, which take advantage of readymade (man-made) roosts. Structures used frequently include bridges, icehouses, pill-boxes, disused railway tunnels, houses and barns etc. Bats have home ranges which vary from species to species; from just 3-4km from the roost for the smaller bats while the larger noctule may fly 20km or more. Threats to bats include habitat destruction and the severance of commuting routes, use of agricultural pesticides, intensification of farming methods and deliberate persecution by man. Bats have few natural predators; however, the domestic cat is probably the most efficient predator.

3 LEGISLATION AND POLICIES

3.1 CONSERVATION OF HABITATS & SPECIES REGULATIONS 2017

European Union legislation required that member states designate sites for the protection of habitats and species included in the annexes of both Council Directive 92/43/EC on the Conservation of Natural Habitats and of Wild Flora and Fauna (the Habitats Directive) and Council Directive 79/409/EEC on the Conservation of Wild Birds (the Birds Directive). This legislation was implemented in the UK by the Conservation of Habitats and Species Regulations 2017 (as amended) (“the Habitat Regulations”). This results in sites being designated as Special Areas of Conservation (SACs) and Special Protection Areas respectively (SPAs) and the protection of particular species. Offences under this legislation include:

- Deliberately (or recklessly in Scotland) capture, injure or kill a bat
- Deliberately (or recklessly in Scotland) disturb a bat in a way that would (significantly in Scotland) affect its ability to survive, breed or rear young (or hibernate or migrate in England, Wales and Northern Ireland) or (significantly in England, Wales and Scotland) affect the local distribution or abundance of the species.
- Damage or destroy a roost (this is an ‘absolute’ offence)
- Possess, control, transport, sell, exchange or offer for sale/exchange any live or dead bat or any part of a bat

It should be noted that whilst the UK is no longer a member state, the protection enacted under the Conservation of Habitats and Species Regulations 2017 will continue to apply in UK law through the Conservation of Habitat and Species (amendment) (EU Exit) Regulations 2019 and the European Withdrawal Act 2018.

It is possible to undertake damaging activities under the auspices of a Protected Species Licence issued by Natural Resources Wales which provides a derogation from the Regulations, meaning that an otherwise illegal operation carried out under licence is lawful.

3.2 WILDLIFE & COUNTRYSIDE ACT 1981

The Wildlife & Countryside Act 1981 (as amended) is the legislation for England and Wales for nature conservation, making it an offence to:

- Intentionally or recklessly disturb a bat in or at a roost;
- Intentionally or recklessly obstruct access to a roost;
- Intentionally destroy, damage or otherwise disturb a roost (whether bats are present or not); and
- Intentionally or recklessly kill, injure or take (capture) a bat.

3.3 THE NATURAL ENVIRONMENT AND RURAL COMMUNITIES ACT, 2006

Section 40 of the NERC Act places a duty to conserve biodiversity on public authorities in England (and, for parts of the legislation, Wales). It requires local authorities and

government departments to have regard to the purposes of conserving biodiversity in a manner that is consistent with the exercise of their normal functions such as policy and decision-making. 'Conserving biodiversity' may include enhancing, restoring or protecting a population or a habitat.

Section 41 requires the Secretary of State to publish and maintain lists of species and types of habitats which are regarded by Natural England to be of "principal importance" for the purposes of conserving biodiversity in England. These 56 priority habitats and 943 species are drawn from earlier lists of United Kingdom Biodiversity Action Plan Priority Species and Habitats. The Section 41 lists are needed by decision-makers in local and regional authorities when carrying out their duties under Section 40 of the Act.

A public authority can be a:

- local authority including a unitary, county, district, community, parish or town council
- government department or one of their executive agencies
- non-departmental government body
- NHS Trust
- utility company
- body carrying out functions of a public character under a statutory power

3.4 THE ENVIRONMENT (WALES) ACT, 2016

The Environment (Wales) Act 2016 requires that all public authorities, when carrying out their functions in Wales, seek to "maintain and enhance biodiversity" where it is within the proper exercise of their functions. In doing so, public authorities must also seek to "promote the resilience of ecosystems".

This ensures that biodiversity is an integral part of the decisions that public authorities take in relation to Wales. It also links biodiversity with the long term health and functioning of our ecosystems, therefore helping to align the biodiversity duty with the framework for sustainable natural resource management provided in the Act.

In Wales, this legislation replaces and enhances the Natural Environment and Rural Communities Act (2006) which sought to raise the profile of biodiversity and to make sure that it is considered in all local authority decisions by ensuring that "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity."

Other elements of NERC 2006 may still apply.

3.5 THE WELL BEING OF FUTURE GENERATIONS (WALES) ACT, 2015

The Well-being of Future Generations Act became law in April 2015 and is concerned with improving the social, economic, environmental and cultural well-being of Wales.

It will make the public bodies in Wales listed in the Act think more about the long-term, work better with people and communities and each other, look to prevent problems and take a more joined-up approach.

To help public bodies achieve the same vision, the Act puts in place seven well-being goals. Linked to the goals a set of National Indicators are currently under development to help measure whether we are achieving the goals including the Resilient Wales goal.

Resilient Wales' goal

'A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).'

The Well-being of Future Generations Act recognises the importance of nature and its biodiversity. The resilient Wales' goal will help with nature recovery objectives in Wales.

The Act establishes a statutory Future Generations Commissioner for Wales to support the public bodies listed in the Act to work towards achieving the well-being goals.

The Act also establishes Public Services Boards (PSBs) for each local authority area in Wales. PSBs are tasked with improving the economic, social, environmental and cultural well-being of its area by working to achieve the well-being goals.

4 METHODOLOGY

The survey consisted of three parts:

1. Biological records data search;
2. Scoping survey / initial building inspection; and
3. Activity surveys:
 - Survey 1 - Dusk (emergence) survey.
 - Survey 2 - Dusk (emergence) survey.

4.1 DESK STUDY

A desk study was undertaken as part of the Building Inspection involving gathering data from the South East Wales Biodiversity Records Centre (SEWBRc). The search included all submitted records on about all species of bats from within a buffer of 2km. Details of all sites within 10km notified for the presence of horseshoe bat species was also requested.

4.2 SCOPING SURVEY

4.2.1 BUILDINGS - EXTERNAL DAYTIME ASSESSMENT

The building was subject of an external inspection by a bat licensed ecologist on 22nd March 2022 to assess the potential of the building to support bats. The assessment also aimed to identify any features that may be used by bats. The assessment was subjective and based primarily upon the building's structure, current use, location and the presence (or otherwise) of suitable roosting locations within it. The assessment involved a brief scan of the building's exterior from close range. The inspections included:

- checking the exterior of the structure for locations that appeared potentially suitable for use by bats as roosts or as access points to roosts further inside the building; and
- closer inspection of such locations for bats and signs of use by bats.

4.2.2 BUILDINGS - INTERNAL DAYTIME ASSESSMENT

Following the external inspection, an internal daytime assessment was undertaken using a torch and where appropriate, an endoscope, ladder and binoculars to search all safely accessible internal voids (including roof spaces, cellars etc.) deemed to be potentially suitable for use by bats as roosts.

Internal inspections continue the assessment carried out previously of the external fabric of the building and also to look for direct evidence of bats within the building. Evidence may persist inside buildings, whereas weather will deteriorate any evidence on the outside of the building. Evidence of roosting bats includes:

- Live or dead bats;
- Bat droppings;

- Fur oil/urine staining;
- Characteristic scratches; and
- Noise made by bats.

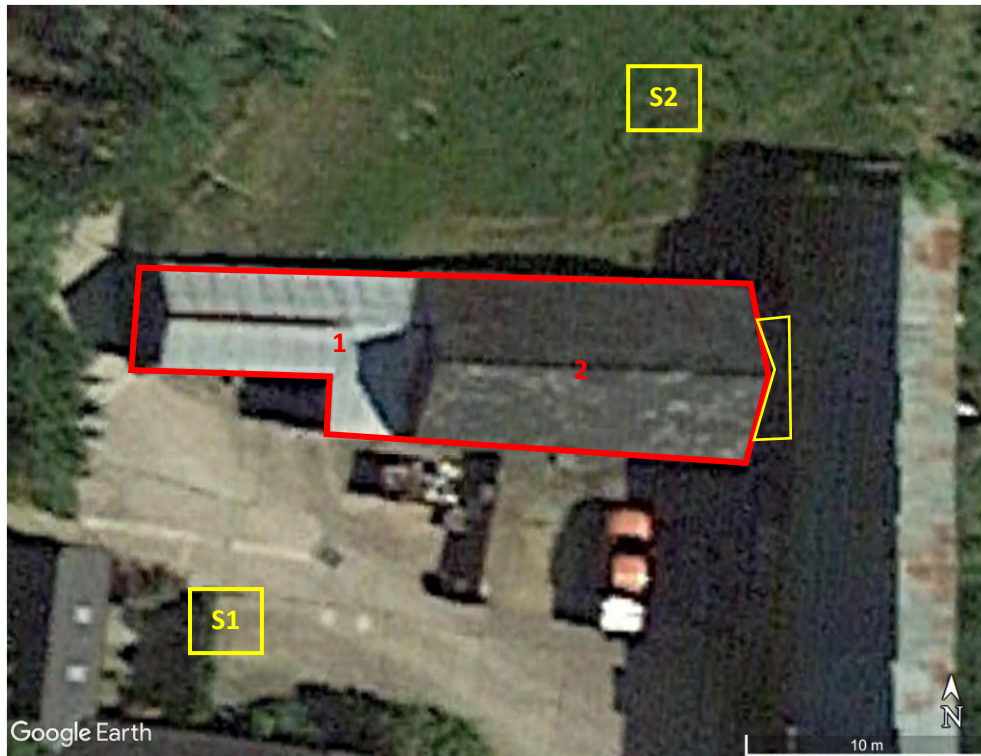
4.3 ACTIVITY SURVEY

As the building provides bats with a limited number of suitable access points, the building was classified as being of low to negligible importance to and for bats. Additionally, it was not possible to access the internal roof spaces over the building. Therefore, a single activity survey was recommended and commissioned to determine whether or not any species of bat was using the building, and whether or not any further activity surveys would be required to determine in what numbers and for what purpose. This is so that an adequate assessment of any potential impacts of the development on bats that might use the building can be made in line with current survey guidelines and best practice.

4.3.1 Dusk survey – 11.05.2022

A dusk emergence survey was carried out of the building utilising 2(no.) surveyors (S1 – S2; locations shown at **Figure 3**) situated so as to be able to view all visible elevations and roof lines of buildings likely to be used by bats at the same time. The surveyors were equipped with Batlogger M full spectrum bat detectors.

Figure 3 – detail of Penlenlas Farm (surveyors numbered yellow; building outlined red)



(Image courtesy of Google Earth)

4.3.2 Dusk survey – 24.05.2022

A second dusk survey was undertaken on the 24th May 2022 using the same surveyor locations and equipment as 11.05.2022.

4.4 CONSTRAINTS

It was not possible to access the internal roof spaces of Building 1; however, undertaking a dusk emergence survey negated this constraint.

There may be records not submitted to or digitised by the local records centre; it should be noted that the lack of records does not prove absence.

There were no other constraints to the surveys.

5 RESULTS

5.1 DESK STUDY

5.1.1 Species

The data search identified 189 records of 11no. named species of bat and 6no. unclassified species / groups of bats within 2km. Species identified in the data search are listed at **Table 1**.

The closest record was of an unclassified pipistrelle bat 268m to the north-east, with the closest day roosting records being from 383m to the north east. The same roost site also offers horseshoe species bats a hibernation roost.

Table 1 – Bat species included in the records search

Scientific name	Common name
<i>Chiroptera</i>	Bat
<i>Eptesicus serotinus</i>	Serotine
<i>Myotis brandtii</i>	Brandt's Bat
<i>Myotis mystacinus/brandtii</i>	Whiskered/Brandt's Bat
<i>Myotis mystacinus</i>	Whiskered Bat
<i>Myotis nattereri</i>	Natterer's Bat
<i>Myotis</i>	Myotis Bat species
<i>Nyctalus noctula</i>	Noctule Bat
<i>Pipistrellus nathusii</i>	Nathusius's Pipistrelle
<i>Pipistrellus pipistrellus agg.</i>	Pipistrelle
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle
<i>Pipistrellus</i>	Pipistrelle Bat species
<i>Plecotus auritus</i>	Brown Long-eared Bat
<i>Plecotus</i>	Long-eared Bat species
<i>Rhinolophus ferrumequinum</i>	Greater Horseshoe Bat
<i>Rhinolophus hipposideros</i>	Lesser Horseshoe Bat

5.1.2 Designated sites

Four statutorily designated sites notified for bats or including them as primary reasons for designation / notification were found within 10kms of Lagradanta Farm:

- Usk Bat Sites SAC, 5285m away; however, it should be noted that this is a multi-location site and therefore the SSSIs will give a good indication of locations. It is notified for the presence of hibernating lesser and greater horseshoe bats;
- Foxwood SSSI (5285m)
- Gilwern Hill SSSI (6356m)*
- Siambre Ddu SSSI (7011m)
- Mynydd Llangatwg (Mynydd Llangattock) SSSI (8668m)

* It should be noted that this site is NOT notified for the presence of any bat species and is likely an error in the data search results.

All the SSSIs are component features of the SAC.

All these sites are at a distance from the development site which would preclude any direct physical adverse impacts on them.

No horseshoe bats were recorded during the surveys so it is highly unlikely that there will be any indirect adverse impacts on the species for which they were notified.

These sites will not be considered further in this report.

5.2 BUILDING SCOPING SURVEY

5.2.1 External assessment

Photos are at **Appendix A**.

It was found that the Buildings 1 & 2 offer bats a number of potential access points via:

- A gaps under raised ridge tiles;
- Gaps as a result of broken, slipped, raised and missing slates
- Via gups in and under external timberwork; and
- Gaps and holes in doors.

No evidence of bats was recorded externally.

5.2.2 Internal assessment

It was not possible to access the roof spaces over the Building 1.

Three old droppings commensurate with pipistrelle species bats were observed within the western end of Building 2.

No other evidence of bats was found anywhere in the buildings.

5.2.3 Summary

The building sites in a rural area which is used by a range of bat species The building has been used by bats at some point in the recent past, but in what numbers and for what purpose the inspection was not able to determine.

5.3 BAT ACTIVITY SURVEY

5.3.1 Summary

Due to the use of the building by bats, a series of activity surveys were recommended to determine levels of bat activity in the area, whether or not bats were using the building and whether or not further surveys would be required. The activity surveys were therefore recommended in line with current guidelines and best practice and undertaken.

Mitigation and an NRW development licence in respect of bats would be required if bats are confirmed as using the building.

5.3.2 Survey 1 - 11.05.2022

Table 4 - survey #1 information summary

Survey Type	Date	Timing	Sunset / Sunrise	Weather
Dusk	11.05.22	20:30 – 22:30	20:53	Fine. No cloud; no rain; wind F0(0). 15– 14°C

Overall levels of bat activity at the site were very low, with occasional passes by noctule, common pipistrelle bats being heard and / or seen.

Pipistrelle bats were seen to be using (flying through) the adjacent agricultural barns.

No bats were seen to emerge from, return to or take any interest in the buildings during the survey.

5.3.3 Survey 1 - 24.05.2022

Table 4 - survey #1 information summary

Survey Type	Date	Timing	Sunset / Sunrise	Weather
Dusk	24.05.22	20:50 – 22:45	21:12	Fine. No cloud; no rain; wind F0(0). 13– 12°C

Overall levels of bat activity at the site were very low, with occasional passes by noctule, common pipistrelle bats being heard and / or seen.

Pipistrelle bats were seen to be using (flying through) the adjacent agricultural barns.

No bats were seen to emerge from, return to or take any interest in the buildings during the survey.

6 EVALUATION OF ECOLOGICAL FEATURES

It is confirmed that Penlenlas Farm is NOT currently used for roosting purposes by bats.

6.1 BATS

No bats were seen to use the building during the bat surveys. However, old droppings commensurate with pipistrelle bat species were observed in Building 2. Given the low levels of activity in the area and old nature of the droppings, it is considered that the building is not used on a regular basis and is more likely to be on an adventitious basis due to the proximity to adjacent buildings which do appear to be used by common pipistrelle bats. Additionally, the presence of cats in Building 2 is likely to affect its use by bats.

CONFIDENCE LEVEL: HIGH

6.2 WINTER USE

While pipistrelle bats are known to utilise buildings during the winter hibernation period, due to the presence of cats, low levels of activity and the low evidence base, it is considered unlikely that bats would use the building for hibernation purposes.

CONFIDENCE LEVEL: HIGH

6.3 ROOST LOCATIONS

Not applicable.

CONFIDENCE LEVEL: HIGH

6.4 INCIDENTAL RECORDS

None.

7 CONCLUSION

All bats are **internationally** important as they are protected by European law. Therefore, any roost where they are found is of **high** ecological importance.

Within the context of the site and the proposed development, it is considered that the building is not currently used by bats except on an adventitious basis. Therefore, the property is considered to be of **negligible - low** ecological importance to and for bats.

A Natural Resources Wales development licence will not be required prior to the removal of the roof and the refurbishment of the building.

Ecological supervision of elements of the project is recommended.

Mitigation will not be required.

Enhancements will be required.

8 IMPACTS OF DEVELOPMENT

8.1 PROPOSED DEVELOPMENT

It is proposed to convert the existing buildings and repurpose them to domestic accommodation for the owner's family.

8.2 PREDICTED IMPACTS WITHOUT MITIGATION

As there are no bats currently using the building, it is considered that there will be **no adverse impacts** on bats.

8.3 MITIGATING THE IMPACTS

8.3.1 Temporary mitigation

Not applicable.

8.3.2 Permanent mitigation

Not applicable.

8.3.1 Enhancements

Enhancements will be required.

8.4 CONCLUSION

It is considered that as bats are not currently using the building, an NRW licence and mitigation will not be required.

However, enhancements to benefit bats are required.

9 MITIGATION

Neither temporary nor permanent mitigation will be required.

9.1 TEMPORARY MITIGATION

Not applicable.

9.2 PERMANENT MITIGATION

Not applicable.

9.3 ENHANCEMENTS

The inclusion of measures to enhance the development for bats are a requirement.

Such measures might include:

- The installation of wall mounted bat boxes e.g. Schwegler 1WQ (or similar) on either (or both of) the western or south western elevation.
- Installation of 1no. pole mounted bat box, the location of which is to be determined by the ecologist in light of on-site conditions (suggestions at **Figure 4**).

Figure 4 - detail of Penlenlas Farm (potential locations of pole mounted enhancements starred yellow)



(Image courtesy of Google Earth)

9.4 LANDSCAPING

Not applicable.

9.5 GENERAL

It should be noted that if at any stage of the project:

- any number of any bat species

are observed within the building, all works affecting those areas and / or bats will cease and not resume until such time as NRW has been consulted and the development licence suitably amended to suit the species and number of bats observed.

10 GENERAL RECOMMENDATIONS

10.1 LICENSING

It is considered that a Natural Resources Wales development license in respect of bats will not be required unless bats are encountered during the course of the project.

10.2 SUPERVISION

Despite there being no evidence of current use by bats, it is recommended that the removal of the roof is supervised by a suitably experienced and licensed ecologist.

An ecologist should be "on call" for the duration of the project and consulted in the event that bats are found during the other phases of the development.

10.3 TIMESCALES

There are no seasonal constraints on the development.

10.4 LIGHTING

Any bat enhancement feature installed must not be exposed to any direct or indirect lighting at all.

Where it is necessary, any and all external lighting will be directed away from retained vegetation, hedges and boundaries; wherever possible, it will be low level, movement sensitive and on timers to reduce adverse impacts on bat commuting routes and foraging habitats.

10.5 BUILDING MATERIALS CONSTRAINTS

There are no constraints on timber or other building materials as bats will not have access to the roof spaces of the building.

10.6 ROOFING MATERIALS CONSTRAINTS

There are no constraints on roofing materials as bats will not have access to the roof spaces of the building.

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APPENDIX A - PHOTOGRAPHS

Plate 1 – Buildings 1 & 2 front (southern) elevation



Plate 2 – Building 1 side (western) elevations



Plate 3 – Buildings 1 & 2 rear (northern) and side (western) elevations



Plate 4 – Building 1 internal view



Plate 5 – Building 2 - western end



Plate 6 – Building 2 – eastern end



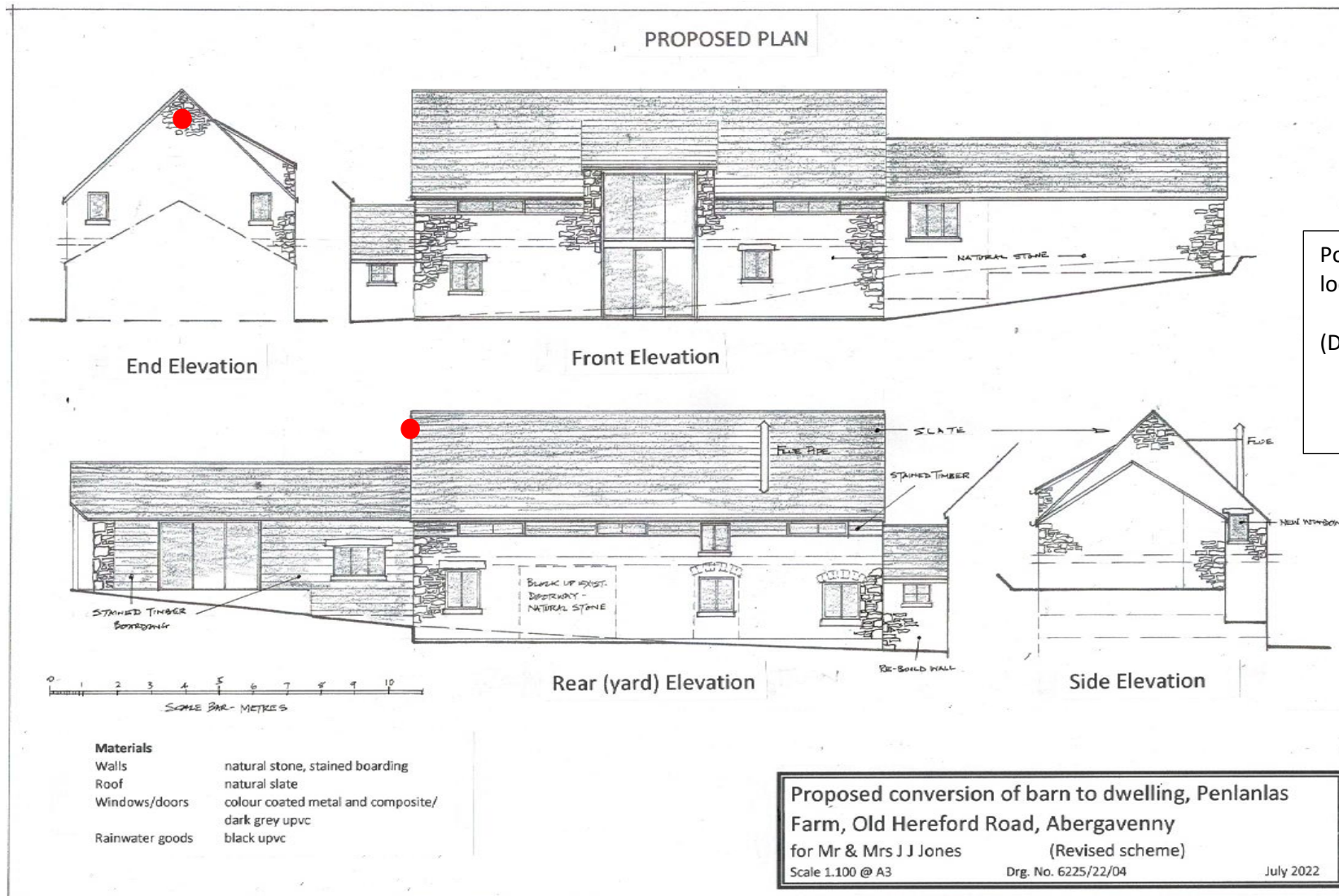
Plate 7 – link building (southern elevation) & Building 2 eastern gable end



Plate 8 – Link building & Building 2 rear (northern) elevation



APPENDIX B – DRAWING 6225/22/04



Potential bat lox location dotted red
 (Drawing not to scale)