MERTHYR VALLEY HOMES

YEW CLOSE GARAGES, MERTHYR TYDFIL

BUILDING INSPECTION REPORT

JUNE 2025

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1.0 INTRODUCTION

1.1 Soltys Brewster Ecology (SBE) were instructed by Merthyr Valley Homes to undertake a building inspection of the garage units at Yew Close, Merthyr Tydfil. The site is proposed for the '*demolition of garage block to create parking bays*' (Planning Application: P/25/0034). A preliminary bat roost assessment (PRA) is required to inform the planning submission.

1.2 The site is located at Yew Close in Gurnos, Merthyr Tydfil (Site Location and Proposed Plan included in Appendix I & II). The site currently comprises of the existing dilapidated garages blocks (14no. units), refurbished blocks (13no.) and hardstanding.

1.3 The current report presents the findings of a desk study and Preliminary Roost Assessment undertaken at the site in April 2025 and identifies any ecological constraints or opportunities associated with the demolition and redevelopment proposals.

2.0 METHODOLOGY

2.1 In order to establish the existing ecological conditions at the site, a combination of desk-based consultation and Preliminary Roost Assessment was undertaken in April 2025. The scope of survey work was based on the current best practice survey guidelines (BCT, 2023).

Desk study

2.2 The desk study involved consultation with the South East Wales Biodiversity Records Centre (SEWBReC) to identify any records of bats within 2km and roof-nesting birds within 150m. A summary plan of the data provided is included in Appendix III.

Preliminary Roost Assessment (PRA)

2.3 The PRA was undertaken on 10th April 2025 by a suitably experienced & licensed ecologist[1] and comprised of an external and internal inspection of the existing garage units to search for evidence of bats or nesting birds. The site visit also included a walkover survey of the site to identify and describe other ecological features (e.g. boundary vegetation).

2.4 The external inspection of the garage units involved the use of binoculars and torch to identify possible access/entry points into the buildings and aimed to identify any evidence of use by bats such as droppings, staining, prey remains, scratch marks, noise etc. The survey was undertaken from ground-level around the exterior of the building with the scope of the survey informed by the guidelines published by the Bat Conservation Trust (BCT, 2023). During the site visit, keys were made available to undertake an internal inspection of the garage blocks proposed for demolition. The internal aspect of the garages were inspected with the use of a troch to identify any evidence of roosting bats or nesting birds.

2.5 The potential of the buildings within the site boundary to support roosting bats was determined based on the following categories (BCT 2023):

Buildings:

- **Known or confirmed roost.**
- **High** - A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures

[1]Associate Member of the Chartered Institute of Ecology & Environmental Management (CIEEM) & NRW bat licence holder (Ref: S093420/1)

have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.

- **Moderate** – A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this list is made irrespective of species conservation status, which is established after the presence is confirmed).
- **Low** – A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site but could be used by individual hibernating bats).
- **Negligible** – No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
- **None** – No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).

2.6 Any evidence of use of the building or surroundings by other protected species such as nesting birds was also noted along with any stands or individual plants of invasive species – i.e. those listed under Schedule 9 of the Wildlife & Countryside Act 1981 (as amended).

Limitations

2.7 Although keys were made available for the internal inspections of garage blocks 8 – 21, internal inspections of units 8, 13, 18 and 19 were not undertaken due to either health and safety reasons (collapsed roof) or a seized lock. This was not considered to impact the overall findings of the survey given an internal/external inspection of all other connected units was possible.

3.0 RESULTS

Desk Study

SEWBReC Records

3.1 Consultation with SEWBReC returned a total 489no. bat records within the 2km search radius. The closest roost record was associated with a potential Soprano Pipistrelle *Pipistrellus pygmaeus* roost located approx. 570m south-west of the site. Also within a 1km buffer of the site was a single Common Pipistrelle *Pipistrellus pipistrellus* day roost recorded 790m north-west of the site. In addition, the data search identified the presence of Common and Soprano Pipistrelle and Brown-Long Eared bat *Plecotus auritus* roosts associated with Cyfarthfa Castle, located approx. 1km south-west of the site.

3.2 The data search returned a list of foraging/commuting bat records (>450 records) within a 2km radius, with records of Common and Soprano Pipistrelle, Brown Long-Eared bat, Noctule *Nyctalus noctula*, Serotine *Eptesicus serotinus*, Daubenton's Bat *Myotis daubentonii*, Natterer's Bat *Myotis nattereri* and Greater and Lesser Horseshoe bat *Rhinolophus ferrumequinum/hipposideros*. The majority of these records were associated with the habitats at Cyfarthfa Castle and the River Taff approx. 1km west of the site.

3.3 The SEWBReC results included a number of roof nesting bird records within 150m of the site. Those of relevance to the habitats present at the site include Herring Gull *Larus argentatus*, House Martin *Delichon urbicum*, House Sparrow *Passer domesticus*, Jackdaw *Coloeus monedula*, Lesser Black-Backed Gull *Larus fuscus*, Pied Wagtail *Motacilla alba*, Starling *Sturnus vulgaris* and Swallow *Hirundo rustica*. Summary plans illustrating the SEWBReC results are included in Appendix III.

Preliminary Roost Assessment

3.4 The PRA and walkover survey identified that the site entirely comprises of hardstanding and the existing garage blocks (see cover image and Figure 1). The areas of hardstanding and paving do support occasional annual weed species e.g., Annual Meadow Grass *Poa annua,* Common Dandelion *taraxacum offincale* and Herb Robert *Geranium robertianum*. There are no other ecological features and the habitats were considered to be of negligible ecological value (see Figure 1 and Cover Image).

3.5 The site supports three linear blocks of garage units. Two of which have recently been refurbished (units 1-7 and 22-27) and were not included in the assessment. The middle block,

containing garage units 8-21, comprise of brick, pebble dash, metal doors, a combination of wooden and metal frames and felt roofing. The garage units are in a poor condition and in a general state of disrepair. For example, many of the wooden door frames are rotten, doors damaged and the roof to the rear of units 21-18 has collapsed.

3.6 The survey only identified minor potential roost features (PRFs) associated with the external elevations. This included gaps associated with rotten wood around the door frames of units 8 and 9, and missing pebble dash and mortar on unit 16, which provide small access points into the internal garage space (see Figures 2 & 3). There were also a small gap between the door frames associated with unit 19. No other PRFs were identified during the survey.

3.7 An internal inspection of garage units 9, 10, 11, 12, 14, 15, 16, 17, 20 and 21 was undertaken during the current survey. As discussed in paragraph 2.7, units 8, 13, 18 and 19 were not inspected internally due to health and safety concerns or seized locks. Internally the garages do not support a cavity wall, with the walls consisting of brick and breezeblock (Figure 4). Inside the garage roof comprises of stramit board (wood wool board), bitumen felt and timber beams. The only PRF associated with the internal aspect of the garage units is a small gap (3-4cm) to the rear of units 9-15 between the timber beam and wall (Figure 5). Other gaps have been filled in with spray/foam insulation. Apart from the external gaps to units 8, 9, 16 and 19 there are no other access points for bats. In addition, those with collapsed or partly collapsed roofs (Figure 6) were considered unsuitable to support roosting bats as they are likely open, well-lit and exposed to weather conditions.

3.8 No evidence of roosting bats (or nesting birds) was found during the internal inspection e.g., droppings or feeding remains. Rat droppings were noted within units 9 and 10 (Figure 7). In combination with the lack of ecological features at the site, well-lit environment and lack of ecological connectivity (built-up residential area), the garage units were assessed to be of Negligible potential to support roosting bats.

Figure 1 – Yew Close Garages

Figure 2 – Missing/rotten wooden frame (units 8 & 9)

Figure 3 – Missing pebble dash on unit 16

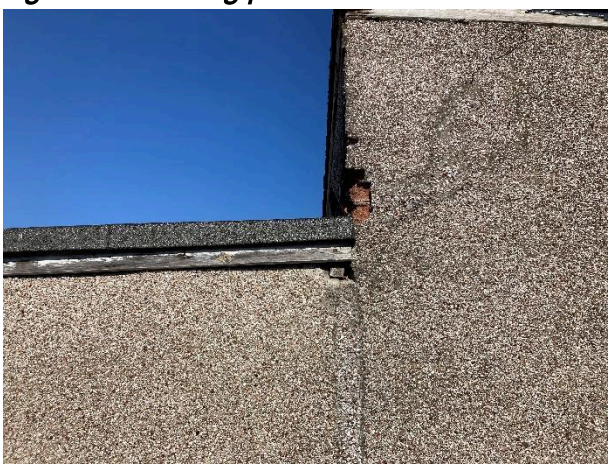

Figure 4 – Internal garage space

Figure 5 – Gap to rear of garage units

Figure 6 – Collpased roof (unit 20)

Figure 7 – Rat droppings

4.0 LEGISLATION, POLICIES AND PLANS

4.1 The following legislation relating to nature conservation and biodiversity are considered of relevance to the current proposals at the site.

Legislation Pertaining to the Protection of Bats

4.2 All species of bats in Britain are afforded legal protection under the Wildlife and Countryside Act (1981) (as amended) and the Conservation of Habitats and Species Regulations (2017). This means it is an offence (subject to certain specific exceptions) to deliberately capture or kill/injure a bat, to damage or destroy a place used for shelter or protection (e.g. roosts) or to deliberately disturb a bat in such a place.

4.3 Case Law has placed an onus on local planning authorities to satisfy 'three tests' under the Conservation of Habitats and Species Regulations when determining applications that could affect European Protected Species. Essentially, these three tests are: i) that there is no satisfactory alternative; ii) that the proposed development is in the over-riding public interest (including those of a social or economic nature) and iii) the proposed development would not adversely affect the Favourable Conservation Status (FCS) of the species locally. Even without the requirement for planning consent in this instance a licence will be required to undertake the works. To obtain a licence from Natural Resources Wales (NRW) the third test will need to be met which means appropriate measures will need to be in place to demonstrate how the works can be achieved without adversely affecting the FCS of the species present.

4.4 Bats are also afforded protection within Wales under the Countryside and Rights of Way Act (2000) and Environment (Wales) Act 2016.

Legislation Pertaining to the Protection of Birds

4.5 Under the Wildlife and Countryside Act (1981 (as amended) all wild birds and their nests are protected against damage or destruction whilst in use or being built.

Planning Policy Wales (2024)

4.6 This document set out the land use planning policies of the Welsh Government with Chapter 6 dealing with Distinctive and Natural Places which covers Biodiversity and Ecological Networks.

The advice contained within PPW is supplemented for some subjects by Technical Advice Notes (TAN's), with TAN 5 addressing Nature Conservation & Planning.

4.7 TAN 5 identifies a number of key principles, which the town and country planning system in Wales should consider. Those relevant are detailed below:

- *Work to achieve nature conservation objectives through a partnership between local planning authorities, Natural Resources Wales (NRW), voluntary organisations, developers, landowners and other key stakeholders;*
- *Integrate nature conservation into all planning decisions looking for development to deliver social, economic and environmental objectives together over time;*
- *Ensure that the UK's international obligations for site, species and habitat protection are fully met in all planning decisions;*
- *Look for development to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally;*
- *Promoting approaches to development which create new opportunities to enhance biodiversity, prevent biodiversity losses, or compensate for losses where damage is unavoidable. Minimising or reversing the fragmentation of habitats and improving habitat connectivity through the promotion of wildlife corridors;*
- *Local planning authorities should seek to protect trees, groups of trees and areas of woodland where they have natural heritage value or contribute to the character or amenity of a particular locality;*
- *The presence of a species protected under European or UK legislation is a material consideration when a local planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat.*

Updates to PPW Chapter 6: Distinctive and Natural Places

4.8 An updated version of PPW: Chapter 6 was published with immediate effect on 11th October 2023 in a published letter to Local Authorities from Julie James AS/MS – Minister for Climate Change[2]. These changes have now been incorporated as part of the latest edition (February 2024) of PPW. The new guidance provides an update on Net Benefit for Biodiversity and the

[2] Published letter from Julie James AS/MS (Minister for Climate Change) to Local Authorities – Heads of Planning. Reference: MA/JJ/2512/23. Dated 11th October 2023.

Step-wise Approach, with extracts considered of relevance to the development site provided below:

Maintaining and Enhancing Biodiversity

4.9 Planning authorities must follow a step- wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.

4.10 All development must deliver a net benefit for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed). Even if the biodiversity value has been maintained, there must still be a pro-active process to look for and secure enhancement through the design and implementation of the development.

5.0 CONCLUSIONS AND RECOMMENDATIONS

5.1 The combination of walkover and building inspection survey undertaken in April 2025 identified that the proposed site entirely comprises of hardstanding and buildings considered to be of negligible ecological value.

5.2 The proposed layout plan indicates that the design will involve the demolition of the dilapidated garage units to be replaced with new parking bays. The following avoidance, mitigation and enhancement measures are considered appropriate to the current development proposals.

Bats

5.3 The current survey found no evidence to indicate the use of the garage units by roosting bats. The structures were assessed to be of negligible potential to support roosting bats, as per the BCT (2023) guidelines. No further bat survey work would be recommended to inform the demolition of the building. The following measures would be considered appropriate on a precautionary basis:

- Prior to the demolition, contractors should be made aware of the low risk that roosting bats may be present[3];
- In the unlikely event that evidence of bats (e.g., live/dead bats or droppings) are encountered during the works, all works to the building demolition will be stopped immediately and a licenced bat ecologist or Natural Resources Wales (NRW) contacted for advice on how to proceed. No disturbing works shall re-commence until a licence is in place.

Birds

5.4 The current survey found no evidence to suggest the current or previous use of the building by nesting birds, However, as a precaution it is recommended that should the demolition works be undertaken within the breeding bird season (which typically extends from March – August inclusive) the works should be preceded by a check for nesting birds. If an active bird nest is found bird, no works can be undertaken until all chicks have fledged and the nest is no longer active. Timing of demolition work outside the nesting season (September – February) would avoid any potential issues although may not be feasible given the poor condition of the remaining garages.

[3] As per BCT (2023) guidelines for structures with negligible potential a 'small amount of uncertainty remains as bats can use small and apparently unsuitable features on occasion'.

Net benefit for biodiversity

5.5 As per the current PPW Edition 12, see paragraph 4.10 above, all development must deliver a net benefit for biodiversity. Given the site's negligible baseline ecological value, it is considered that a net-benefit for biodiversity could be achieved with the provision of bird boxes at an off-site location. In the long-term these could provide additional nesting resources for birds within the local area.

5.6 The inclusion of bird or bat boxes onto the refurbished garage units is not considered appropriate given the boxes could not be placed in a high position (garages <2.5m high) and would be subject to high levels of disturbance, possible vandalism and potential predation (e.g., domestic cats). Two Swift boxes will be installed on the north-east elevation of Flats 1-6 Plane Grove, Merthyr Tydfil (located approx. 100m north of the application site) – see Appendix IV for bird box locations. The boxes will be grouped together and installed at a height of 5-7m, away from windows or doors with a clear flight path available. Boxes will be a woodcrete/woodstone model[4] (e.g., Vivara Pro WoodStone® Swift Nest Box[5] or equivalent model) and surface mounted. The off-site location is within the control of the applicant (Merthyr Valley Homes) and the status of bird boxes will be checked as a part of future maintenance or inspection visits. Any missing or damaged boxes will be replaced.

[4] The selection of woodstone models is based on their long lifespan and durability.
[5] https://www.nhbs.com/woodstone-swift-nest-box or https://www.wildlifeservices.uk/product-page/woodstone-swift-nest-box

REFERENCES

Bat Conservation Trust (2023) *Bat Surveys for Professional Ecologists – Good Practice Guidelines*. 4th Edition. Bat Conservation Trust, London.

APPENDIX I SITE LOCATION PLAN

APPENDIX II PROPOSED SITE PLAN

APPENDIX III SEWBREC DESK STUDY RESULTS

APPENDIX IV BIRD BOX LOCATIONS