P/2025/0409 Cae Goch

Following a review of P/2025/0409 Cae Goch, our comments are as follows:

Provision of a single bat box is not sufficient to provide interim roosting for multiple species:

The provision of bat boxes alone is not sufficient to mitigate the short-term loss of roosting opportunities when dealing with multiple bat species. The compensatory bat roost will need to be constructed prior to Demolition of the farm house building as per the next comment.

> To provide interim roosting opportunities/a place of safety into which any bats encountered during the works may be relocated, a Vivara Pro Beaumaris WoodStone Bat Box (Midi) is to be erected upon a suitable tree or other structure on-site (to be determined by the licensed ecologist) prior to the start of works. The box will be installed where it will be unaffected by the proposed works, at a height of ≥4m from ground level, away from any immediate clutter or artificial light spill, and out-of-reach of domestic cats or other terrestrial predators. Post-completion of works, the box will be retained in-situ in perpetuity.

Compensatory bat roost needs to be constructed prior to Demolition of the farm house building:

There is some lack of clarity within the Bat and Nesting Bird Report titled 'Protected Species Survey (Bats). Page 22 of the report states the following:

> *N.B: To ensure that there will be no period during which the bats roosting on-site are left without suitable roosting opportunities, the compensatory roosts to be provided will be completed within the same winter period as in which the existing roosts are to be destroyed.*
>
> *In practice, this is likely to mean that the works to the redbrick barn, the block-built barn, and the cowshed, which the surveys indicate are not being used by roosting bats, are undertaken first. Then, only once the family currently resident in the existing dwelling has moved to the now converted/new building, the existing dwelling will be demolished and the compensatory roost constructed. As the surveys indicate that the redbrick barn, the block-built barn and the cowshed are not being used by roosting bats, the works to these buildings may be undertaken without timing restrictions.*

Any compensatory roost provision must be constructed at least 3-6 months prior to demolition of the farm building to provide bats with a functioning roost immediately on loss of their old roost, to allow sufficient time for bats to discover the new roost, and to provide more security should any delays occur. The standard is to have the new roost physically available and ready as per CIEEM's 2025 Bat Mitigation Guidelines which states "Where possible (in terms of layout, access, buildability), replacement roosts should be ready for use by bats (i.e. installed as per all requirements) before the existing roost is destroyed."

A review of the proposed plans indicates that the compensatory roost is currently allocated within the new garage, which is intended to occupy some shared footprint as the existing farmhouse. This creates a clear conflict with regards to timing.

To ensure compliance with best-practice mitigation principles, the garage/roost structure should therefore be repositioned to a location where the roost can be constructed prior to demolition of the farmhouse, and in a location that will not adversely affect bats that may utilise the compensatory roost (for example, further to the southeast).

Alternatively, the garage may remain in its proposed location, provided that a separate, purpose-built compensatory roost is constructed in an alternative position that will remain unaffected by the demolition works.

Drawing of compensatory roost needs to be provided:

A drawing of the proposed compensatory roost will need to be provided showing internal specifications and details of the proposed ridge tiles etc and signed off by a suitably-qualified ecologist.

Lighting:

A bat-sensitive lighting plan will need to be submitted showing the lightspill / dark zones of the development, particularly in close proximity to the compensatory roost.

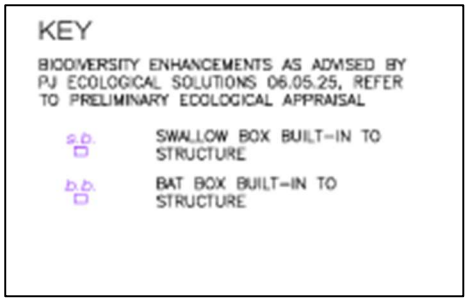
> Compensatory roosting opportunities for common pipistrelle bats will be provided in the form of a 1 No. Vivara Pro IB VL 17 Bat Built-In Box, which will be incorporated into the walls of the proposed garage building, to be constructed upon the footprint of the dwelling to be demolished. The box will be installed at the apex of the southeast gable, ≥4m from ground level, away from any immediate clutter or artificial light spill, and out-of-reach of domestic cats or other terrestrial predators.

Proposed plans need amending to reflect correct nesting bird provision:

The ecological appraisal report specifies the installation of four Vivara Pro Build-In House Sparrow Nest Boxes (double-chamber) to be integrated into the fabric of the proposed dwelling (see below). However, the current plans instead illustrate swallow nest boxes, and only two boxes are shown, contrary to the four required by the report.

While the placement of one box on a southeast-facing elevation is understood, the plans must be updated to include two additional house sparrow boxes, positioned appropriately on a northeast-facing elevation or other suitable location. This will ensure that the submitted drawings accurately reflect and deliver the ecological measures specified in the appraisal.

> As compensation for the house sparrow nesting sites to be demolished, 4 No. Vivara Pro Build-In House Sparrow Nest Boxes (Double Chamber) will be installed within the fabric of the proposed dwelling. To provide a range of thermal niches, one of the boxes will be installed in a southeast-facing position (per one of the existing nests), and the other three will be installed in a northeast-facing position (per the other existing nest and per best-practice). Each box will be installed close to eaves level, away from any immediate clutter or direct artificial light spill, and out-of-reach of domestic cats or other terrestrial predators.



NRW's comments:

We are in agreement with the comments and conditions within the NRW consultation response (dated 15th October 2025) regarding GCN.