

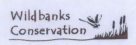
Mr and Mrs Piggott

Hugmore House
Hugmore Lane, Llan-y-pwll LL13 9YE

Bat and Bird Survey Report

August 2024



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REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

Report Version	Date	Completed by:	Approved by:	Date
Final	29/08/24	Tanya Cobb	M. Smith	02/09/24
Amended				
Amended				

The information we have prepared is true and we confirm that the opinions expressed are our true and professional bona fide opinions.

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1.0 INTRODUCTION

- 1.1 This report has been prepared on behalf of Mr Piggott and provides the results of a visual assessment and nocturnal bat surveys undertaken at Hugmore House, Hugmore Lane, Llan-y-pwll, LL13 9YE during the summer of 2024. This report will inform the planning application for the redevelopment of the building. The buildings in question comprises a brick barn (B1) and blockwork workshop (B2), on the outskirts of Wrexham Industrial Estate that are currently used for storage of machinery and tools and as a workshop.
- 1.2 Work proposals include converting the redbrick section of the barn into a residential house (Building B1) and the demolition of the workshop (Building B2) to allow a walled garden to be built. The footprint of the building will be reduced. Windows and archways currently open will be blocked with windows and doors. It is not anticipated the roof will be replaced. Two skylights are to be included within the roof on the eastern aspect.
- 1.3 The buildings are situated within a farmyard and form the end two buildings of a larger 'U-shaped' building complex (Figure 1). The wider landscape consists of predominantly agricultural i.e. arable, land on the periphery of Wrexham Industrial Estate (Figure 2). The building (outlined in red below) is from this point on referred to as the 'Site'.



Figure 1: Aerial view of the Site; outline red. B1 is outlined blue, B2 is outlined yellow. (Base image © Google 2024)

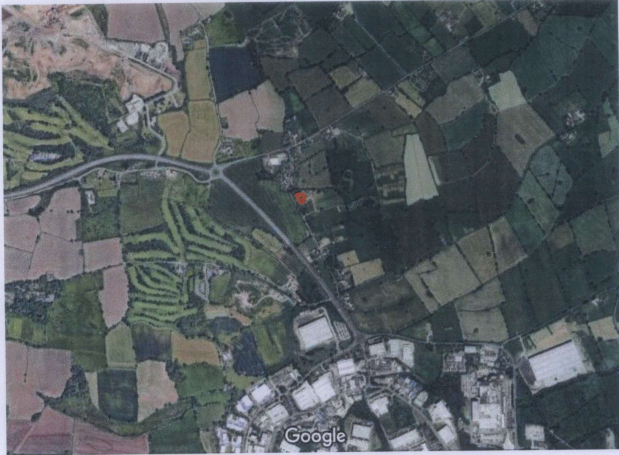


Figure 2: Wider landscape showing the Site outline red. (Base image © Google 2024)

2.0 SURVEY METHODOLOGY

Desk Top Study

- 2.1 A desk top study was undertaken, including review of the Magic.gov website and other online resources.

Building Visual Assessment

Bats

- 2.2.1 The exterior of all aspects of the building were visually assessed for potential roost features (PRFs), potential access points and evidence of bat activity on 18th June 2024. With the aid of binoculars and endoscopes, features such as gaps in brickwork, small gaps under barge/soffit/fascia boards, raised or missing roof/ridge tiles or gaps at gable ends, which have the potential for use as roosts/access points, were sought. Evidence that bats actively used these PRFs/access points would include staining within the gaps, or bat droppings or urine staining under gaps; a note being made wherever these were present. The presence of cobwebs and/or general detritus within and around PRFs was used as an indicator that bats had not recently used the area to access the building. Following the external assessment, an internal assessment of the building was undertaken, searching for the same evidence.

Birds

The building was assessed for nesting birds at the same time as the bat visual assessment of the building on 18th June 2024. All cracks, gaps and potential nesting areas were checked for the presence of nests/nesting material/live birds, and 10 minutes was spent listening for any noise of nestlings whilst inside the building.

Bat Emergence Survey

- 2.3.1 Three nocturnal surveys were undertaken on the building to observe any potential bats roosting in the building not identified during the visual assessment. All surveys were overseen by Mick Smith, 16 years' experience in bat ecology, holder of NRW bat licence (licence no: S092489/1) and 19 EPS Mitigation licenses (NRW and NE). Surveyors were positioned strategically so that good coverage of all aspects of the building was achieved. The surveys were undertaken within the optimum time for bat activity (May-September) and under optimum conditions.
- 2.3.2 The surveyors each used an Anabat Walkabout, and a pair of Flir Scion thermal video cameras and/or Nightfox Whisker infrared cameras. Static bat detectors used were Anabat Swift. Any recordings were analysed using Batsound and/or Analook Insight, and video footage from the thermal cameras was reviewed using VLC media player.

- 2.3.3 The surveys were undertaken following methodology set out in the Bat Conservation Trust Handbook Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023).

Table 1: Emergence surveys were carried out as follows:

Survey	Date	Surveyors
Dusk	03/07/2024	Mick Smith, Jack Halpin ACIEEM, Tony Medcalf (NRW bat license S092201& Chris Gosset (NE bat license 2019-39258)
Dusk	08/08/2024	J. Halpin, T. Medcalf, C. Gosset & Tanya Cobb
Dusk	27/08/2024	Mick Smith, Jack Halpin, Tony Medcalf & Chris Gosset

2.4 Limitations

- 2.4.1 There were no limitations to the visual assessment. All nocturnal surveys took place within the optimal survey season (May – September) to assess whether bats or birds are using a building. The building was classified as having high potential for bats and as such at least two of the surveys must be conducted between May and August (Collins, 2023). This has been met.
- 2.4.2 The weather during parts of the second survey (08/08/2024) was sub-optimal due to light rain. This led to the survey ending early, at an hour and a half after sunset, as opposed to two hours after sunset (Collins, 2023).
- 2.4.3 Pinpointing the location of the roost entrance points required internal views during the survey. The visibility inside the building during each survey was poor due to low light conditions. A thermal/IR camera was placed in the building in a surveyor's stead, field of view was narrow and minimal due to the size of the room but was able cover the areas where bats were thought to have emerged from in previous surveys. A static bat detector was placed in the building from 08/08/2024 to 15/08/2024 and recordings analysed to ensure species identification was correct.
- 2.4.4 It is considered that the above limitations do not jeopardise the robustness of the conclusions and recommendations made within this report and that they can be acceptance as a fair and accurate representation of how bats are using the building.

3.0 RESULTS

3.1 Desk Top Study

- 3.1.1 No statutory or local, non-statutory designated sites exist within 1km of the Site.

3.2 Building Visual Assessment

Bats

- 3.2.1 Building B1 is a two-storey redbrick barn that is open internally to the pitched slate roof and moderns roofing membrane (Plates 1-8). There are two upper storey windows on the western aspect of the building, with no glass panes. There are three skylight windows set in the roof with panes of glass. The roof has been completely replaced in recent years and is in great condition. A single upper floor room is present at the southern end of B1 and is only accessible by ladder. An open doorway provides free flight access to this room from B1 and an open window (no glass pane) provides free flight access to the room from the workshop (B2). Another open doorway provides free flight access to B1 from the remaining building complex outside the redline boundary.
- 3.2.2 Building B2 is a two-storey steel-framed, blockwork building attached to B1. The building consists of a single room at full roof height and has cement fibreboard cladding for the top half of the external walls attached to block walls that run to the eaves. The roof is also made of cement fibreboard. A full height metal roller shutter door is set within the southern aspect of the building and is closed and well-sealed.
- 3.2.3 An accumulation of small droppings were observed on the floor beneath the southern wall plate of B1 within B2 (See plate 4- droppings on the floor below the red star). Scattered droppings were also found throughout B1 and B2.
- 3.2.4 Potential roost features suitable for crevice dwelling bats internally (e.g., *Pipistrelle* sp., *Myotis* sp) exist within the building. These PRFs are predominantly within numerous cracks within the walls and around timber joists into walls and on wall plates and on top of the ridge beam. Externally PRF's include on top of the wall plate, within cracks within the brickwork and under slates. Potential roost features suitable for void dwelling species (e.g., *Plecotus spp.*) also exist within the building B1 among the ridge beam and within the isolated upper floor room.
- 3.2.5 Building B1 is classed as having high potential for roosting bats. Building B2 is classed as having high potential for roosting bats also.

Birds

- 3.2.5 Multiple Swallow (*Hirundo rustica*) nests were evident among the timber beams of B1 and were in active use at the time of the visual assessment and subsequent nocturnal surveys. Evidence of House Sparrows nests (*Passer domesticus*) were also present.

3.3 Bat Emergence Surveys

- 3.3.1 Three emergence surveys were undertaken and are detailed in Table 2.

Table 2: Details emergence surveys undertaken.

Date	Survey type	Time started	Time finished	Sunrise/ Sunset time	Temp.	Weather conditions
03/07/2024	Dusk	21:38	23:40	21:40	17°C	Dry and overcast, light breeze.
08/08/2024	Dusk	20:34	22:21	20:51	18°C	Light rain at times becoming heavy after 1hr30min and overcast, light breeze.
27/08/2024	Dusk	19:56	22:10	20:10	17°C	Dry, light breeze and overcast.

3.3.2 Survey 1 - Dusk survey 3rd July 2024

Bat activity during the survey was minimal, however, three emergences were recorded. A *Myotis* sp. bat was recorded periodically foraging within the workshop from 21:56 to 22:04. At 22:06, a **Common pipistrelle** (*Pipistrellus pipistrellus*) **exited** the building through the most northerly window on the western aspect of the building, after emerging from the internal ridge beam within the upper floor isolated room (Roost R1). At 22:12 and 22:55, a **Common pipistrelle and Brown Long-eared bat BLE** (*Plecotus auritus*) **exited** through the central archway on the western aspect of the building, after both emerging from the internal ridge beam within the upper floor room, respectively (Roost R1 and R2).

3.3.3 Survey 2 - Dusk survey 8th August 2024

Little bat activity was recorded during this survey, similar to Survey 1. Three emergences were observed from the building. The first bat recorded was a **Whiskered bat** (*Myotis mystacinus/brandtii*) **emerging** from atop the internal wall plate in the workshop and exited through the doorway (Roost R3, plate 4). Immediately following, at 21:18, a **Common pipistrelle emerged** from the doorway connecting the adjoining building to B1 to the north, and exited Building B1 through the central archway on the western aspect

of the building (Roost R4; plate 5). It is not known if the bat flew into the adjoining building and through this doorway into B1 by flying directly from the outside through the large opening on the eastern aspect (Plate 8) or if it was roosting within the adjoining building. At 21:59, **an unconfirmed species emerged (assumed BLE)** from the internal ridge beam (Roost R2) within the upper floor isolated room **and then re-entered** under the doorway lintel into the room (Roost R5, plate 3). This bat is a suspected Brown Long-eared bat due to the lack of echolocation call recorded and because its presence was recorded at a similar time after sunset to the Brown Long-eared bat emerging in Survey 1 from the same location.

3.3.4 Survey 3 - Dusk survey 27th August 2024

Bat activity during the survey was moderate and eight emergences were recorded. The first bat recorded was a **Common pipistrelle emerging** from the internal ridge beam (Roost R1) within the upper floor isolated room at 20:15. This bat continued to fly around the building until 20:33 when it exited building B1 via the archway. At 20:17, a **Whiskered bat emerged** from where the rafter joins the brick wall adjoining the remaining building complex to the north (Roost R6, plate 5). At 20:36 and 21:34, **two Common pipistrelles and one Soprano pipistrelle (*Pipistrellus pygmaeus*) emerged**, respectively, from the doorway connecting the adjoining building to Building B1 (Roost R4 and R7, plate 5). The two Common pipistrelles then exited through the archways of B1. The Soprano pipistrelle flies inside the buildings and re-enters a roost atop the internal wall plate in the workshop at 21:35 (Roost R8, plate 4). At 21:00 and 21:30, **two Soprano pipistrelles emerged** from the internal ridge beam (Roost R9) within the upper floor isolated room. At 21:08, **a Soprano pipistrelle emerged** from atop the internal wall plate of the brick wall adjoining the remaining building complex (Roost R10; plate 5).

3.4 Summary

- 3.4.1 It is considered that the level of survey effort undertaken is sufficient to assess the use of the buildings by bats. The Site consists of eight bat roosts within its redline boundary. Roost R4 and R7 are considered to be in the adjoining building and access B1 through the doorway on the northern aspect. Very little activity was recorded by surveyors positioned to the east of the Site and as such it is considered unlikely bats flew into the building from this aspect but are roosting within the roof structure similar to the numerous roosts within B1. The proximity of Roost R4 and R7 to the Site, even though they will be unaffected by the development themselves, means that they should be included within the impacts on the Site. As such from this point we will consider that there are ten roosts effected by the development. Roosts are shown in Figure 3. Due to the low number of individuals (maximum two at one time) and lack of consistency of a number of these roosts being

used in each survey, it is likely that all ten roosts are day roosts and probably being used by the same species depending upon various variables. It is not considered likely that all 10 roosts are being used each night but that they change overtime over the summer to suit climatic conditions.

Table 3: Roost location summary

Roost No.	Description
R1	Three Common pipistrelle roosting on the internal ridge beam within the upper floor room.
R2	Two suspected Brown Long-eared bat roosting on the internal ridge beam within the upper floor room.
R3	A Whiskered bat roosting atop the internal wall plate in building B2.
R4 (Adjoining building)	Three Common pipistrelle roosting within the retained building complex and accessing building B1 through the open doorway set into the connecting brick wall.
R5	A suspected Brown Long-eared bat returning to roost under the doorway lintel of the upper floor room.
R6	A Whiskered bat roosting on the wooden rafter, where it joins the brick wall, adjoining the remaining building complex.
R7 (Adjoining building)	A Soprano pipistrelle roosting within the retained building complex and accessing building B1 through the open doorway set into the connecting brick wall.
R8	A Soprano pipistrelle returning to roost atop the internal wall plate in building B2.
R9	Two Soprano pipistrelle roosting on the internal ridge beam within the upper floor room.
R10	A Soprano pipistrelle roosting atop the internal wall plate in building B1.

3.5 *Significance of roost*

3.5.1 Locally: Roosts R1, R4, R7 to R10 are considered day roosts and are likely part of a wider network of roost sites as Common pipistrelle and Soprano pipistrelle bats are known to frequent a range of roosts and types within their wider landscape within a year. Due to the type of roost, its size, the likelihood that individuals will have multiple other roosts within the local area, it is considered to be of low conservation significance locally.

3.5.2 Locally: Roosts R2 and R5 are considered day roosts of Brown Long-eared bats, which are likely part of a wider network of roosts. Brown long-eared bats are known to frequent a range of roosts and types within their wider landscape across the year. Due to the type of roost, its size, the likelihood that individuals will have multiple other roosts within the local area individually they are considered to be of low conservation significance locally.

- 3.5.3 Locally: Roosts R3 and R6 are considered day roosts of the bat species complex *M. myotis*/*M. brandtii* or Whiskered bat. These roosts are likely to be part of a wider network of roost sites within the surrounding region, which this species is known to do. Due to the type of roost, its size, the likelihood that individuals will have multiple other roosts within the local area it is considered to be of low conservation significance locally.
- 3.5.4 Regionally: Common and Soprano pipistrelle day roosts R1, R4, R7 to R10 are regarded as of low conservation significance regionally. Common and Soprano pipistrelle are considered to be widespread and common species of bat. Nationwide data shows Common and Soprano pipistrelle individual numbers on the increase since 1999 and population numbers stable since 2017 (Bat Conservation Trust, 2023).
- 3.5.5 Regionally: Brown Long Eared bat day roost R2 and R5 are considered to be of low conservation significance regionally. Brown Long-eared bats are a widespread bat species, found across most of the UK, and their population trends have remained stable over the last ~20 years across Wales (Bat Conservation Trust, 2023).
- 3.5.6 Regionally: Whiskered bat day roosts R3 and R6 are considered of a low conservation significance. Whiskered bats are a widespread bat species, found across most of the England and Wales, and their population trends have remained stable over the last ~20 years across Wales (Bat Conservation Trust, 2023).

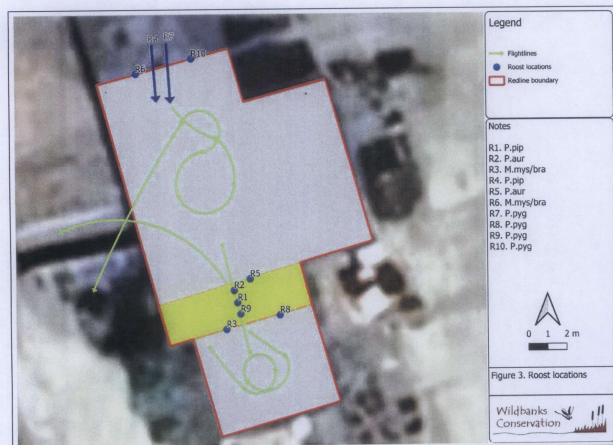


Figure 3. Roost locations.

- 3.5.7 Collectively the buildings to be developed have eight day roosts within them and two further in the adjacent building, of individual or very low numbers of four different species of bat. It is considered that this building may form a feature with moderate significance locally for bats.

4.0 DISCUSSION AND RECOMMENDATIONS

- 4.1 The Site has been subject to a building visual assessment, and three nocturnal bat surveys on 3rd July, 8th August and 27th August 2024 overseen by Mick Smith (NRW bat licence number: (licence no: S092489/1) or Jack Halpin, 7 years' experience in bat ecology.
- 4.2 Fourteen bats, including Common pipistrelle, Soprano pipistrelle, Brown Long-eared and Whiskered, were recorded emerging from the building from eight roost locations and two further locations in the adjacent building. A total of ten roost locations will be affected by the development. Roost locations ranged from atop wall plates, to on top of ridge beams and amongst rafters. All ten roosts are classed as being day roosts with low conservation status. Due to the number of individual roosts of four different species it is considered that this building may form a feature with moderate significance locally for bats.
- 4.3 Building B1 is very open, there is no insulation and with open archways and windows it is considered likely that large levels of fluctuation in environmental conditions will be present within the building and as such rendering it likely unsuitable for higher status roosts of any bat species.
- 4.4 It is also considered that the structure of the building does not offer suitable features for hibernation purposes. Although it is possible that bats will use the building during milder conditions through the winter.
- 4.5 The building is classified as a **confirmed roost with high potential for roosting bats**.
- 4.6 The proposed development will destroy all access points and eight roost locations for bats and nesting birds. Roost R4 and R7 in the adjoining building will not be destroyed or modified. Suitable mitigation is required to ensure that the favourable conservation status of species found on Site is not affected through the development.
- 4.7 Recommendations
- Bats*
- 4.7.1 The proposed works without mitigation or consideration to bats could potentially disturb, modify or destroy a known bat roost and potentially kill or injure individual bats. Without mitigation the risk to individual bats increases but can be reduced to a low level with the implementation and strict adherence to a Method Statement. **A European protected species (EPS) licence from Natural Resources Wales (NRW) is needed** to legitimise

the destruction of the roost. This will mean the risk of direct and indirect impacts on bats will be reduced to minimal levels.

4.7.3 The proposed Draft Mitigation Strategy below (to be agreed by Local Authority and Natural Resources Wales) should be adhered to before and during construction works. It should be noted that additional effort or requirements may be required in addition to those below

4.7.4 *Mitigation Strategy*

- No works will take place to the property that could affect the bat roost until the European Protected Species Mitigation License
- Works should commence outside of the bat's peak activity season (May – September).
- No external lighting is planned, but if this changes, consideration is to be given to the commuting and dispersal routes used by bats. All external lighting should comply with Guidance document 08/23 Bats and Artificial Lighting at Night.
- A suitable qualified ecologist will be appointed to oversee the works.
- Prior to the commencement of works a toolbox talk will be provided to onsite personnel by a NRW licensed ecologist. The talk will include information regarding the protection of species, habitats, legal implications, their responsibilities and what to do if a protected species is encountered.
- A minimum of 1 month prior to the start of works, two bat boxes (such as Schwegler 1FS bat box, or similar) will be installed on suitable trees close to the site. These will provide alternative roosting opportunities during construction. They will also provide a location to put any bats found during the hand stripping of the roof. (See 4.7.7 for further details).
- Demolition works should be avoided for the period of hibernating (when temperatures are consistently below 5°C), although the property provides negligible opportunities for hibernating bats, it does provide opportunities for overwintering bats. If this is not possible, works will proceed with utmost caution with a licensed ecologist or Accredited Agent on site. If bats are found work will stop immediately and the licensed ecologist consulted and/or NRW before works continue.
- The initial works will be carried out under "soft works" technique, e.g. removal of roof slates by hand. A licensed ecologist will provide a watching brief during the initial works and will be available throughout construction on an 'on call' basis.

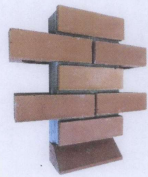
- If bats or birds, or any other animal are found during works, works must stop immediately, and the site ecologist will be contacted, and advice sought: **Wildbanks Conservation; 01691 623505.**

Compensatory habitat

4.7.5 Planning Policy Wales (PPW12) requires development to provide a Net Benefit to Biodiversity (NBB) i.e. a better outcome than if the site would be left undeveloped. As ten bat roosts have been identified within the building, it is recommended that two new integral bat roosting features are included within the new development and seven bat boxes installed on the building and surrounding trees to maintain and improve the long-term opportunities for roosting bats on site.

4.7.6 The proposed works include a barn conversion into residential dwelling. These works allow for the addition of bespoke integral roost features within the building. Figure 4 and 5 show the locations of the bat boxes

- Install two Habibat bat box (or similar) within the brickwork on the southern gable wall
- Install one Schwegler 1FQ bat box on the external wall on the eastern aspect
- Install 6 bat boxes on trees within the wider grounds of Hugmore House. Two boxes to be positioned on three trees between 3-4m in height in west-east orientation with clear flight path and in an un-illuminated position.



Habibat bat box 003



Schwegler 1FQ bat box

4.7.7 In addition, 1 month prior to the start of works, two temporary bat boxes should be positioned in trees surrounding the building. These will be positioned above 3m in height

in an East to West orientation with clear flight lines into them. The bat boxes will provide immediate roosting opportunities for bats, while the works are taking place. These will then be re-positioned post development as part of the 6 boxes detailed in 4.7.6.

4.7.8 Once appropriate mitigation/compensation measures are undertaken, in accordance with the Method Statement, it is unlikely that there will be any significant long-term effect on any individual bats or the conservation status of the species. In fact, long term opportunities for bats will be increased.

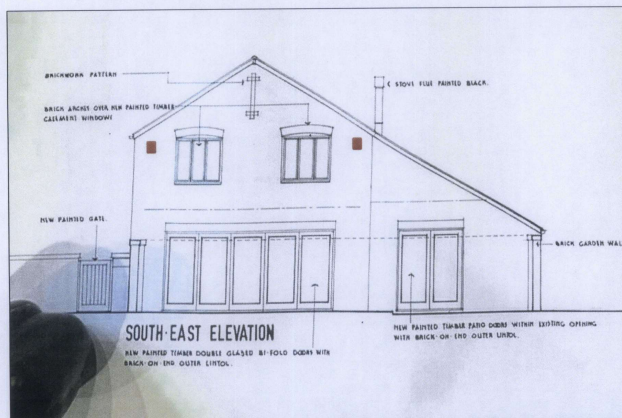


Figure 4: Showing location of Habibat bat box (or similar) on Southeast elevation

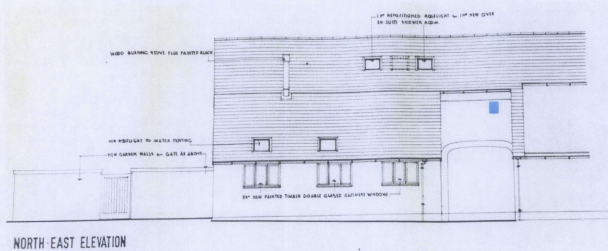


Figure 5: Showing location of Schweglar 1FQ bat box on Northeast aspect

4.8 Recommendations

Birds

- 4.8.1 The disturbance and/or destruction of bird nests is prohibited under the Wildlife and Countryside Act 1981 (as amended). If proposed works commence during the nesting bird season (March-September inclusive), there is potential for nesting birds to be disturbed and nests to be destroyed during the process. To avoid impacts on nesting birds, a pre-works nesting bird check of the Site should be undertaken by a qualified ecologist prior to any works taking place. If nests are identified, the nests must remain intact and undisturbed until young have fledged.

Compensatory habitat

- 4.8.4 Internal features within the barn, that are used or have potential to be used, by small birds and swallows will be destroyed through the development. Supplementary nesting boxes will be installed within the copse to the southwest of the barn. In the form of:

- 2 x 25mm entrance hole boxes (such as Vivaro Pro nest box)
- 2 x 30mm entrance hole boxes



- 4.8.5 Nesting features for swallows will also be created through the development and these will be left available post construction. Four supplementary swallow cups will be added to the beams within the barn adjacent to Building B1 before 01/03/25 to encourage individuals to nest within this area and not within Building B1.





Figure 6: Location of compensatory habitat.

5.0 EXECUTIVE SUMMARY

- 5.1 A brick barn at Hugmore House, Wrexham is being converted into a residential dwelling. An adjoining breeze block workshop is being demolished to accommodate it. An internal visual assessment was carried out on 18th June 2024 and three nocturnal bat surveys were undertaken on 3rd July, 8th August and 27th August 2024.
- 5.2 The building is open from 4 large archways on the ground floor and there is no first floor, so it is a very open to the roof membrane. A room, with open door exists on the southeastern aspect that is more enclosed. Access through this room into the workshop is possible due to an unglazed window. Bat droppings were found scattered through both buildings with an accumulation in one place within the workshop.
- 5.3 Ten day roosts were identified of individual or very low numbers of four different species of bat (Corn pip, Sop pip, BLE and Whiskered bat). Individually each roost is of low conservation significance locally and regionally. Collectively it is considered that they are of moderate significance locally and low conservation status regionally.
- 5.3 **A European protected species (EPS) licence from Natural Resources Wales is necessary** prior to any works taking place to legitimate destruction of the ten bat roosts.
- 5.4 Eight existing roosts and access to two roosts in the adjacent building will be destroyed through the development. Compensatory roosting features will be created within the brickwork and by providing additional bat boxes. Overall, the Site will be improved for roosting bats and nesting birds with the installation of six additional tree-mounted bat boxes, four bird boxes and installing four swallow cups creating a Net Biodiversity Benefit. In addition, 1 month prior to the start of works, two bat boxes will be positioned in trees surrounding the property. The bat boxes will provide immediate roosting opportunities for bats while the works take place.

6.0 LEGISLATION

- 6.1 All bat species are protected in the UK under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). The species is also protected under Annex II of the Council Directive 92/43/EEC 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (the EC Habitats Directive). This has been transposed into UK law by the Conservation of Habitats and Species Regulations 2010 (as amended) in England and Wales. Bats are referred to as European Protected Species (EPS).
- 6.2 It is an offence to deliberately capture, injure or kill a bat; intentionally or recklessly disturb in a way that would affect their local distribution or abundance, or affect their ability to survive, or breed. It is also an offence to damage or destroy a bat roost and to possess, advertise, control, transport, sell, exchange or offer for sale/exchange any live or dead bat or any part of a bat.
- 6.3 If work is proposed that would affect an EPS, then a licence will be required. Natural Resources Wales (NRW), in exercise of the powers conferred under regulation 53(1) and 56(3) (a) of the Conservation of Habitats and Species Regulations 2010, may issue licences for the following purposes:
- Preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;
 - Preventing the spread of disease; or
 - Preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, growing timber or any other form of property or to fisheries; to allow people to carry out activities which would otherwise be illegal.
- 6.4 Before issuing a licence under the Habitats Regulations, the licensing authority must be satisfied that “there is no satisfactory alternative” to the work as proposed and, that the proposed actions “will not be detrimental to the maintenance of the population of the species at a favourable conservation status (FCS)”.
- 6.5 To ensure these requirements are met, the licensing authority must have enough information to complete an assessment of the application. This includes sufficient survey data so that the roost and how it is used by bats is understood and impacts upon the roost are appropriately assessed so that mitigation and/or compensation can be designed into

the proposed development that will ensure the bat population can be incorporated and maintained in the long term.

6.6 Seven bat species are UK BAP Priority Species. These are as follows:

- Barbastelle *Barbastella barbastellus*
- Bechstein's *Myotis bechsteinii*
- Brown long-eared *Plecotus auritus*
- Greater horseshoe *Rhinolophus ferrumequinum*
- Lesser horseshoe *Rhinolophus hipposideros*
- Common noctule *Nyctalus noctula*
- Soprano pipistrelle *Pipistrellus pygmaeus*

6.7 Under the NERC Act, local authorities (and other public bodies) have a duty to conserve biodiversity the local authority must take the protection of the priority habitat into consideration when it is making a planning decision.

6.8 All wild birds, their nests and eggs are protected under Part 1 (Section 1) of the Wildlife and Countryside Act 1981 (as amended). This makes it an offence to:

- i. Intentionally kill, injure or take any wild bird;
- ii. Take, damage or destroy the nest of any wild bird while it is in use or being built;
- iii. Take, damage or destroy the egg of any wild bird; and
- iv. To have in one's possession, or control, any wild bird (dead or alive) or egg or any part of a wild bird or egg.

6.9 In addition, further legal protection is afforded to those wild bird species listed on Schedule 1, which prohibits the intentional or reckless disturbance to a bird while it is nest building, or at a nest containing eggs or young, or to recklessly disturb the dependent young of such a bird.

7.0 REFERENCES

- Bat Conservation Trust, 2024. The National Bat Monitoring Programme Annual Report 2023. Bat Conservation Trust, London. Available at www.bats.org.uk/our-work/national-bat-monitoringprogramme/reports/nbmp-annual-report.
- Collins, J (ed.). 2023. *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn)*. The Bat Conservation Trust. London.
- Bat Conservation Trust (2023) *Bats and Artificial Lighting at Night Guidance Note 08/23* Bat Conservation Trust, London
- Mitchell-Jones, A.J. (2004) *Bat Mitigation Guidelines*. English Nature, Peterborough

A1 APPENDIX – SITE PHOTOGRAPHS



Plate 1: The western aspect of the Site. Note the brick building B1 and the cladding/blockwork building B2. Location of upper floor room shown highlighted yellow.



Plate 2: The eastern aspect of the Site.

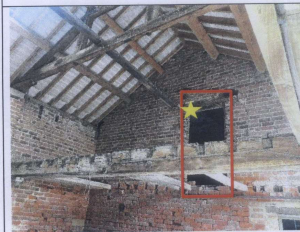


Plate 3: The open doorway (outline red) providing free flight access to the single upper floor room in B1. Yellow star indicates location of Roost R5.



Plate 4: The open window providing free flight access to the upper floor room from the workshop (B2). Red star indicates location of Roost R3, and green star indicates Roost R8.



Plate 5: The 'open doorway' (outlined green) providing free flight access to B1 from the remaining building complex outside the redline boundary, and entrance to Roost R7 and R4. Blue star indicates location of Roost R6 and purple star Roost R10.

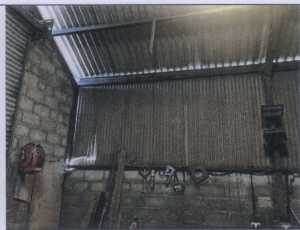


Plate 6: Internal construction of building B2 showing blockwork and cement fibreboard cladding.



Plate 7: Dropping found under the wall plate of the wall between B1 and B2.



Plate 8: Eastern aspect. Large opening into adjoining building shown that allows access into B1.

A2 APPENDIX – FIGURES

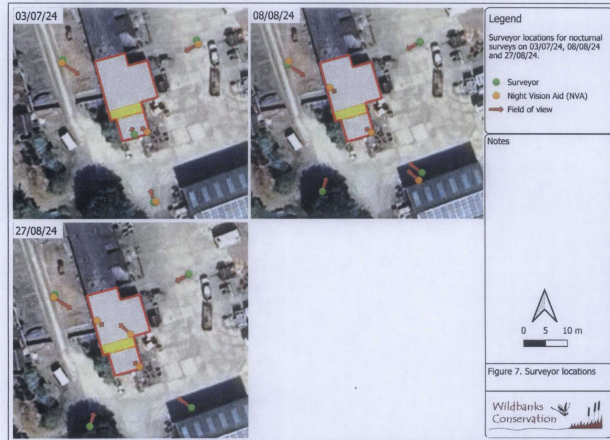


Figure 7: Surveyor locations during nocturnal surveys on 03/07/24, 08/08/24 and 27/08/24.