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Inspection & Assessment in relation to Bats, Breeding Birds and Great Crested Newts

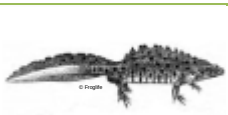
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Maes Isaf
Johnstown
Wrexham
LL14 1UU

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Executive Summary

As part of a proposed planning application concerning the commercial building (comprising “The Tackle Temple” and “Ela V Hair & Beauty”) at Maes Isaf, Johnstown, Tyrer Ecological Consultants Ltd carried out a daytime preliminary roost assessment in relation to bats with an inclusive inspection for breeding birds and great crested newts (*Triturus cristatus*) (GCN) in March 2024.

The survey was commissioned by Blueprint Architectural Services; the proposals are understood to entail the removal of the building’s roof, construction of a second storey and subsequent replacement of the same roof, as well as the addition of a small amenity garden space in the rear car-parking area.

Detailed methods, findings, conclusions and recommendations are presented throughout the report; however, the reader should be aware of the following **Key** points:

Bats:

Based upon the findings of the survey, covered through sections 5.0 – 6.0 of the report and supported by **Appendix I**, the commercial building at Maes Isaf, Johnstown is duly categorised as pertaining to ‘**Low**’ bat roost suitability, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

Table 7.1. Recommended timings for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees where other methods such as PRF inspection are not possible, but unlikely to give confidence in a negative result). To be used in tandem with Table 7.2.

Low roost suitability or PRF-I	Moderate roost suitability	High roost suitability or PRF-M
May to August (structures)	May to September ^a , with at least one of surveys between May and August ^b	May to September ^a , with at least two of surveys between May and August ^b
No further surveys required (trees)		

*It is recommended that **one dusk / emergence survey** is conducted during the active season of bats (May – August, extending into September), in order to establish if / how the buildings are being used by bats, and if so, identify the species present, abundance, roost locations and flight lines around the site following emergence surveys. A total of **2 surveyors** would likely be required at the site to cover all elevations host to roost potential.*

Breeding Birds:

No impacts are applicable in relation to any Sch.1 (WCA) specially protected bird species such as barn owl and no further surveys or recommendations are necessary in relation to specially protected birds. In relation to more common birds, the building and land included within the redline boundary offers limited potential nesting platforms, though the presence of breeding birds during the nesting bird season is deemed possible.

In the interests of potential impact avoidance, it is therefore recommended that any works to built structures or shrubby vegetation should be undertaken outside of the nesting bird season. The nesting bird season is weather dependent but generally extends between March and September inclusive (peak period March – August). For works within the breeding bird season, any areas that can support nesting birds should be checked by a professional Ecologist for nesting birds within 48 hours or less prior to works commencing.

Great Crested Newts:

Whilst the site provides very limited suitable habitat for GCN, it is located within close proximity to the Stryt las a'r Hafod SSSI, which is a component of the Johnstown Newt Sites Special Area of Conservation (SAC). These sites are specifically designated for their important populations of GCN. Whilst it is considered unlikely that GCN are present on site, their presence, alongside that of more generalist amphibians cannot be ruled out.

Given the potentially suitable habitat features on site which could harbour GCN or more generalist amphibians when in their terrestrial phase, notably the stack of bricks, and the proximity to statutory designated sites for which GCN are the designating feature, it is recommended that a precautionary reasonable avoidance measures (RAMs) approach is enacted at the site.

Green infrastructure:

In accordance with the step-wise approach to be adopted by authorities in Wales, it is considered that the scheme has **avoided** impacting the key green infrastructure on site, consisting solely of a small area of amenity grassland.

It is therefore considered that the scheme will not have an adverse impact on the diversity, extent, condition, connectivity or the adaptability of the green infrastructure on site.

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1.0 Introduction & Reasons for Survey

- 1.1 As part of a proposed planning application concerning the commercial building (comprising “The Tackle Temple” and “Ela V Hair & Beauty”) at Maes Isaf, Johnstown, which is hereby referred to as “The Site”, Tyrer Ecological Consultants Ltd carried out a daytime preliminary roost assessment in relation to bats with an inclusive inspection for breeding birds and assessment for great crested newt (*Triturus cristatus*) (GCN) in March 2024.
- 1.2 The survey was commissioned by Blueprint Architectural Services; the proposals are understood to entail the removal of the roof, construction of a second storey and subsequent replacement of the same roof, as well as the addition of a small amenity garden space in the rear car-parking area.



Figure 1.1 – Existing location plan

- 1.3 The aim of the survey was to ascertain:
- Whether or not the buildings or surrounding vegetation are of value for bats / bat roosts,
 - If the structures or impacted vegetation is of value to breeding birds,
 - If the site, surrounding habitats and impacted areas could support GCN.
- 1.4 If any potential roost features (PRFs) were found to be suitable for bats, or signs of use were observed, then more detailed surveys would be recommended i.e. dusk / dawn emergence / re-entry surveys during the main active season of bats which is May – August (extending into September). If additional surveys are required following the initial site visit for bats, breeding birds or GCN, this report will also outline the details of those further requirements.
- 1.5 If it was determined that bat(s) or their roost / place of rest / shelter will be subsequently impacted by the works then a European Protected Species Mitigation Licence (EPSML) from Natural England (NE) would be legally required to proceed with the development.
- 1.6 If evidence indicated breeding birds may be impacted by proposals, tailored recommendations would be made accordingly, species pending.

- 1.7 If GCN are adjudged to be at risk of impact from the proposals, then further recommendations will be made in order to negate the chance that this protected species would be at risk.
- 1.8 As part of the local authority's planning policies and obligations to the Planning Framework, ecological surveys are generally required prior to planning permission being granted where protected / priority habitats and species are, or may be present, that could be affected by the proposals for which the application seeks consent. Where more detailed surveys are recommended by the ecologist, following an initial daytime investigation, then Local Planning Authorities (LPA), on the advice of their ecological advisors, will not grant permission until such time that all relevant information is gathered.
- 1.9 In accordance with Welsh planning policy the site visit also aims to identify opportunities for net biodiversity benefit, and to provide information to satisfy the requirements of a green infrastructure statement.

2.0 Protected Species & Their Requirements

Bats

2.1 All British bats and their **roosts are afforded full protection under the Wildlife & Countryside Act (1981) (as amended) and are listed in Schedule 2 of the Conservation of Habitats and Species Regulations (2019) (EU Exit). When dealing with cases where a European Protected Species (all UK bats) may be affected, a planning authority is a competent authority within the meaning of Regulation 7 of the Regulations, and therefore has a statutory duty, as the local authority, to have due regard to the provisions of the Regulations in the exercise of its functions.

2.2 Uses of Buildings by Bats

- a) Summer breeding roost (May – August)
- b) Hibernation roost (October – March)
- c) Transitional or temporary roost (other months)

2.3 Roost selection is often closely correlated to suitable foraging habitat within a reasonable commuting distance from the roost and different sites are used depending upon insect densities and abundance; climatic conditions can also affect their ability to successfully forage. All British bats are insectivorous.

*** The term roost is generically referred to as a place that bat/s use for the any of the above reasons, however it should be noted that under the Conservation of Habitats and Species Regulations (2019) (EU Exit) (Regulation 43 (d) the term roost is not used but refers to “a breeding site or resting place of such an animal” and is afforded legal protection. The roost, breeding site or resting place of bats, which ever terminology is used is legally protected whether or not bats are in occupation.*

2.4 Up to twelve bat species have been recorded in Wrexham, many of which use built structures for roosting. A variety of building types and features are utilised by bat species at different times of year ranging from occupied residential dwellings to disused barns and bridges. The most frequently encountered species is the common pipistrelle bat (*Pipistrellus pipistrellus*); its abundant status in Wrexham is mirrored throughout the UK.

Breeding birds

2.5 All wild birds, no matter how common, their eggs, young and nests, whilst being built or occupied, are protected under both the Wildlife and Countryside Act (WCA 1981) and Natural Environment and Rural Communities Act (NERC Act 2006). Birds listed on Schedule 1 of the WCA 1981, for example barn owl (*Tyto alba*), are afforded a greater level of protection and are protected also from disturbance.

2.6 Any work that would damage an occupied nest, eggs or young of breeding birds must be avoided; any damage to nests that may occur as a result of the development should be outside of the main breeding bird season (March – August). On occasions nests can become unoccupied during the breeding season but the status of the nest(s) should be determined by a suitably experienced ecologist before any damage takes place.

Great Crested Newt

- 2.7 GCN are fully protected in all life stages by Schedule 2 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), the Wildlife and Countryside Act (1981) (as amended) and Section 7 of the Environment (Wales) Act 2016. They are listed a priority species under section 41 (s.41) of the Natural Environment Rural Communities Act 2006 (NERC Act) and are also listed on the UK Biodiversity Action Plan (UKBAP). The legislation makes it a punishable offence to:
- Deliberately, intentionally or recklessly kill, injure or take a GCN,
 - Deliberately, intentionally or recklessly take or destroy GCN eggs,
 - Possess or control any live or dead specimen, or anything derived from a GCN,
 - Deliberately, intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a GCN,
 - Deliberately, intentionally or recklessly disturb a GCN while it is occupying a structure or place which it uses for that purpose.
- 2.8 In summary, GCN are protected from disturbance, killing, injuring or possession at any life stage, whilst confirmed breeding ponds and resting places are afforded the same protection once identified. Habitat for this species is protected when within certain range of a breeding pond. This places an obligation on local authorities to fully assess the impacts of development on this species prior to determining a planning application.
- 2.9 GCN populations have declined within the UK over recent years due to destruction and fragmentation of breeding ponds and terrestrial habitat. They spend a high percentage of their adult life in terrestrial habitat such as woodland, and shelter in environments with piles of rubble, log piles, tree roots, miscellaneous other for safety, refuge and hibernation. In Wrexham, GCN are widespread and can be found where favourable habitat coincides with connectivity to breeding pools.

Policy

- 2.10 The Environment (Wales) Act 2016 ("the Act") – requires local planning authorities to have regard to area statements in the development of Local Development Plans. The Act introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty). This duty applies to public authorities in the exercise of their functions in relation to Wales and will help maximise contributions to achieving the well-being goals. The Nature Recovery Action Plan supports this legislative requirement to reverse the decline in biodiversity, address the underlying causes of biodiversity loss by putting nature at the heart of decision-making and increasing the resilience of ecosystems by taking specific action focused around objectives for habitats and species.
- 2.11 Part 1 of the Act promotes sustainable management of natural resources, and in Part 1 section 6 states:
- "A public authority must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions."*
- 2.12 Section 7 of the Act places a duty on Welsh Ministers to publish, review and revise lists of types of habitats and species in Wales which they consider are of key significance to sustain and improve biodiversity. The Welsh Ministers must also take all reasonable steps to maintain and enhance the habitats published in these lists and encourage others to take such steps. Section 7 of 'The Act' alongside the UK Biodiversity Action Plan (UKBAP) provided a statutory basis for lists of habitats and species of national conservation importance - now transposed under section 41 (s.41) of the NERC Act.

- 2.13 Planning Policy Wales (PPW) 11th Edition (2021) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales. PPW, the TANs, MTANs and policy clarification letters comprise national planning policy.
- 2.14 PPW (2021) states:
- “The presence of a species protected under European or UK legislation, or under Section 7 of the Environment (Wales) Act 2016 is a material consideration when a 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 and to ensure that the range and population of the species is sustained. Planning authorities should advise anyone submitting a planning application that they must conform with any statutory species protection provisions affecting the site, and potentially the surrounding area, concerned. An ecological survey to confirm whether a protected species is present and an assessment of the likely impact of the development on a protected species may be required in order to inform the development management process. It is considered best practice that screening to determine the presence of protected species should be carried out by a competent ecologist on the basis of data provided by the relevant Local Environmental Record Centre.”*
- 2.15 PPW and the National Development Framework (published as Future Wales – the National Plan 2040) set out how the planning system at a national, regional and local level can assist in delivering these requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).
- 2.16 A ‘Dear Heads of Planning Letter’ was issued 18 October 2023 by the Minister for Climate Change – updating parts of Chapter 6 of PPW. The main changes included strengthened wording and new measures to address policy on green infrastructure, net benefit for biodiversity using the stepwise approach / Decca framework, strengthened approach to the protection of Welsh SSSIs and improved measures to improve the planting of trees and woodlands.
- 2.17 Planning authorities must therefore follow a stepwise approach (see **Figure 2.1** overleaf) to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, or minimized, or mitigated, and as a last resort compensated for; enhancement must be secured wherever possible.

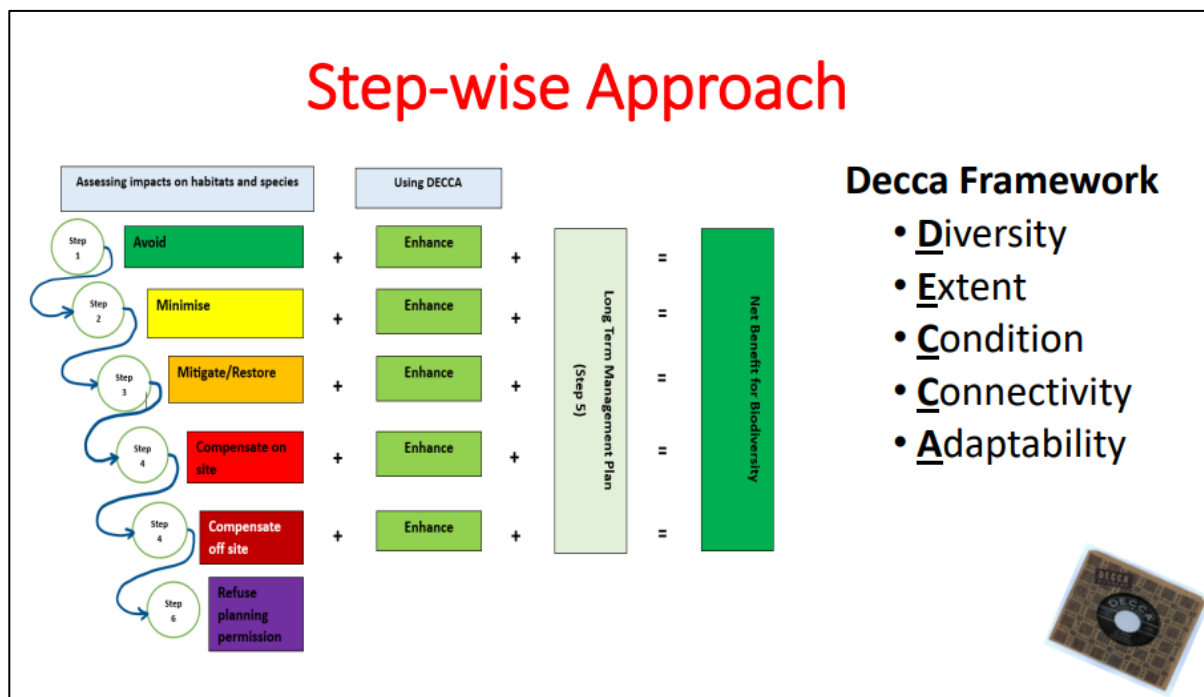


Figure 2.1 – The step-wise approach / DECCA framework to be adopted by authorities in Wales

2.18 PPW also requires developments to achieve a Net Benefit for Biodiversity (NBB):

*“Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a **net benefit for biodiversity**. In doing so planning authorities must also take account of and promote the resilience of ecosystems, in particular the follow aspects:*

- *diversity between and within ecosystems;*
- *the connections between and within ecosystems;*
- *the scale of ecosystems;*
- *the condition of ecosystems including their structure and functioning; and*
- *the adaptability of ecosystems.”*

2.19 There are several plans, strategies and national, sub-regional and local policy statements which provide a framework for development in the Plan area. The Planning and Compulsory Purchase Act (2004) makes it a requirement for local planning authorities in Wales to prepare a Local Development Plan (LDP) for their areas.

2.20 Wrexham County Borough Council prepared a Local Development Plan which was formally adopted in December 2023 and covers between 2013 and 2028 and supersedes any previous development plans for the area.

2.21 Policy SP14 of the Wrexham County Borough Council Adopted Local Development Plan 2013 – 2028, titled ‘Natural Environment, states:

“Developers should consider the natural environment at the pre application stage and must seek to avoid impacting on wildlife features in line with the relevant statutory and non-statutory provisions, including maintaining or helping to achieve a protected species’ favourable conservation status. Developments should also seek to provide biodiversity enhancement, whatever the current level.”

3.0 Survey Methodology

- 3.1 As part of the Inspection & Assessment in relation to Bats, Breeding Birds & GCN report, a desk-top and field-based study is conducted. Methods for both components of the appraisal are given below.

Desktop Study

- 3.2 Prior to a site visit, a desktop study was conducted using online resources to obtain information pertaining to any sites afforded statutory (e.g. SSSI) and non-statutory (e.g. LWS) designations within 2.0 kilometres of the site boundary. To do so, the Multi Agency Geographic Information for the Countryside (MAGiC – provided by DEFRA), 'Lle' (A Geo-Portal for Wales) and DataMapWales (provided by Natural Resources Wales) were all accessed to gather such information. These mapping services were also utilised to locate any priority habitats or publicly viewable protected species records, to help further form conclusions in the context of the study site and the proposed development.
- 3.3 Additionally, the Natural Resources Wales (NRW) and Joint Nature Conservation Committee (JNCC) websites were accessed to provide citation details for statutory designated sites as well as habitat information in proximity to the site.
- 3.4 Historic satellite imagery was reviewed using sources such as Google Earth (© 2023/24) to help establish past use of the land and determine the nature of adjoining and extending habitats; such information aids in the understanding of how the site might interact with its surroundings ecologically and its value in that context, and how the development may impact at a wider scale.
- 3.5 These mapping services were also utilised to discern the number of ponds within a 250-metre radial buffer from the site, to help inform the likelihood of GCN being present on or in the vicinity of the site.
- 3.6 In addition, the Cyngor Bwrdeistref Sirol Wrecsam/Wrexham Country Borough Council 'Search planning applications' online function was utilised to help inform the desktop study by analysis of existing publicly accessible ecological survey results that have been carried out locally within the previous five years.
- 3.7 A commercial data request to the Local Environment Records Centre serving the area – in this case Cofnod – has not been sourced and is justified through application of the following recent guidance:

1) The Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK (CIEEM, 2020) states:

"It is generally expected that a desk study, including a data search, will be a key part of the ecological surveys or reports produced to inform a planning application. Freely available web-based sources of data and contextual information should always be used; in some cases, it may be acceptable to not undertake a data search with the LERC or other relevant NSS or local interest groups, for example:

*ii) Situations where the **data search would be extremely unlikely to provide information needed to inform the assessment, due to the scale and location of the proposed development**. The appropriateness of excluding a data search will need to be judged on a case-by-case basis as, in most situations, it will be essential to carry out such a search even if the development is very small or is likely to have a low impact. It can be very difficult to demonstrate that a data search would not have provided relevant information without obtaining and reviewing those data.*

*iii) In some cases for Preliminary Roost Assessments of buildings in **low impact / small-scale scenarios**, such as an extension to a residential property, loft conversions (full or partial), installation of Velux/dormer windows, single modern agricultural or similar building conversion or demolition; however, it should not be assumed that data searches are never required for such scenarios and this must be judged on a case by case basis and justified accordingly.*

- 3.8 As exemptions as made **bold** above can be applied at the site, whilst following best practice, it is considered unnecessary to conduct a commercial data request following the desk study effort and daytime assessment at this time, which offers a proportionate level of survey effort. If, however, a data search is considered necessary by the Local Authority advisory body to inform the ecological impact assessment following any further surveys recommended in this report, a proportionate data search should be commissioned with results interpreted into the conclusions and recommendations of a re-issued / updated report.

Field Survey

- 3.9 In context with the above, a diurnal inspection and assessment of buildings and the immediate environment in relation to bats, breeding birds and GCN was conducted on 25th March 2024 in dry, overcast conditions (9°C), wind 1/12 (Beaufort scale), 100% cloud, by the following surveyor (see **Table 3.1**):

Table 3.1 – Site surveyor credentials

Name	Description of most relevant credentials
Mr. J Hark Qualifying CIEEM (Consultant Ecologist)	- Five years professional consultant experience and training in species ecology. - Relevant Degree: MSc Wildlife Conservation - An accredited agent under the NRW bat license of Mrs. K. Wilding (S093795-1)

- 3.10 Bat Conservation Trust (BCT) - Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023) states:

“The guidelines should be interpreted and adapted on a case-by-case basis according to site-specific factors and the professional judgement of an experienced ecologist. The question should not be whether the guidelines were followed, but whether the objectives of the survey met? Where examples are used in the guidelines, they are descriptive rather than prescriptive.”

- 3.11 The bat and breeding bird survey was conducted in tandem; the buildings were inspected for potential places that may be of value to bats or breeding birds, and to determine if evidence of use by either group was present. An internal assessment of the buildings took place with the aid of a high-powered torch for evidence of bat use, which mainly includes bat droppings and / or prey items, or the incidental presence of live or dead animals, and investigated for evidence of breeding birds, which broadly involves a search for nesting materials, presence of pellets or accumulated faeces and / or dead juveniles / hatchlings.
- 3.12 External elevations were investigated with the aid of a high-powered torch and close focus binoculars (where necessary) for places that can be used as a roost by bats or as a means of ingress for bats and birds leading to areas of roosting/nesting potential. These features are typically referred to as potential roost features (PRF) concerning bats. All external features were able to be surveyed without constraint.

- 3.13 The surrounding habitat was also considered in terms of general suitability for bat and bird species associated with the local habitat types, as well as in relation to its value for GCN, including both aquatic and terrestrial habitats, where present.
- 3.14 Trees on site, subject to their presence, were inspected for places that may be of value to bats and to determine if evidence of use was present; this typically involves a search for potential roost features along with an investigation of those features using a high-powered torch or close focus binoculars. Potential roost features can include woodpecker holes, rot holes, hazard beams, other vertical or horizontal cracks or splits in stems and branches, partially decayed lifted bark, knot holes, man-made holes, tear-outs, cankers in which cavities have developed, other hollows or cavities, including butt-rots, double-leaders forming compression forks with included bark, gaps between overlapping stems or branches, partially detached Ivy with stem diameters in excess of 50mm or bat / bird boxes. Trees (where present) were also checked for evidence of nesting birds and suitability for relevant species.
- 3.15 Criteria for roost assessment are based upon the determinants given in the Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023). (see Figure 3.1 overleaf).
- 3.16 An assessment of the building was conducted when birds are within their breeding season (this is typically March – August inclusive). Elevations were inspected for evidence of birds that show a high dependency upon built structures, many of which are in a state of decline. These might include the following species for example:
- **Starling** (*Sturnus vulgaris*): Birds of Conservation Concern (BoCC) red status,
 - **House sparrow** (*Passer domesticus*): BoCC red status,
 - **House martin** (*Delichon urbica*): BoCC red status,
 - **Swift** (*Apus apus*): BoCC red status.
- 3.17 Additional to the site's capacity to support common species of bird, the area was subject to an assessment for capacity to support specially protected bird species.
- 3.18 During the desktop assessment, a 250-metre radial search was undertaken from a site-central grid reference in relation to the presence of ponds, ditches or other water bodies that may have potential to support GCN. The information gathered would then be used to aid in establishing if more detailed surveys may be required in relation to this species, either in the form of presence / absence surveys or population class assessments.
- 3.19 Based on the desk study (alongside ground truthing) and utilising both satellite imagery as well as mapping services such as Magic Maps and OS Maps no waterbodies were identified within the site or from within 250m of the site-central grid reference. See Figure 4.2 overleaf for pond locations.

Table 4.1. Guidelines for assessing the potential suitability of proposed development sites for bats, based on the presence of habitat features within the landscape, to be applied using professional judgement.		
Potential suitability	Description	
	Roosting habitats in structures	Potential flight-paths and foraging habitats
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).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible ^a	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.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
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 ^b 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 ^c).	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions ^b 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 table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
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 ^b and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.
a Negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute). b For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance. c Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments (Korsten <i>et al.</i>, 2016 and Jansen <i>et al.</i>, 2022). Common pipistrelle swarming has been observed in the UK (Bell, 2022 and Tomlinson, 2020) and winter hibernation of numbers of this species has been detected at Seaton Delaval Hall in Northumberland (National Trust, 2018). This phenomenon requires some research in the UK, but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in prominent buildings in the landscape, urban or otherwise.		

Figure 3.1 - Bat Conservation Trust guidelines extract

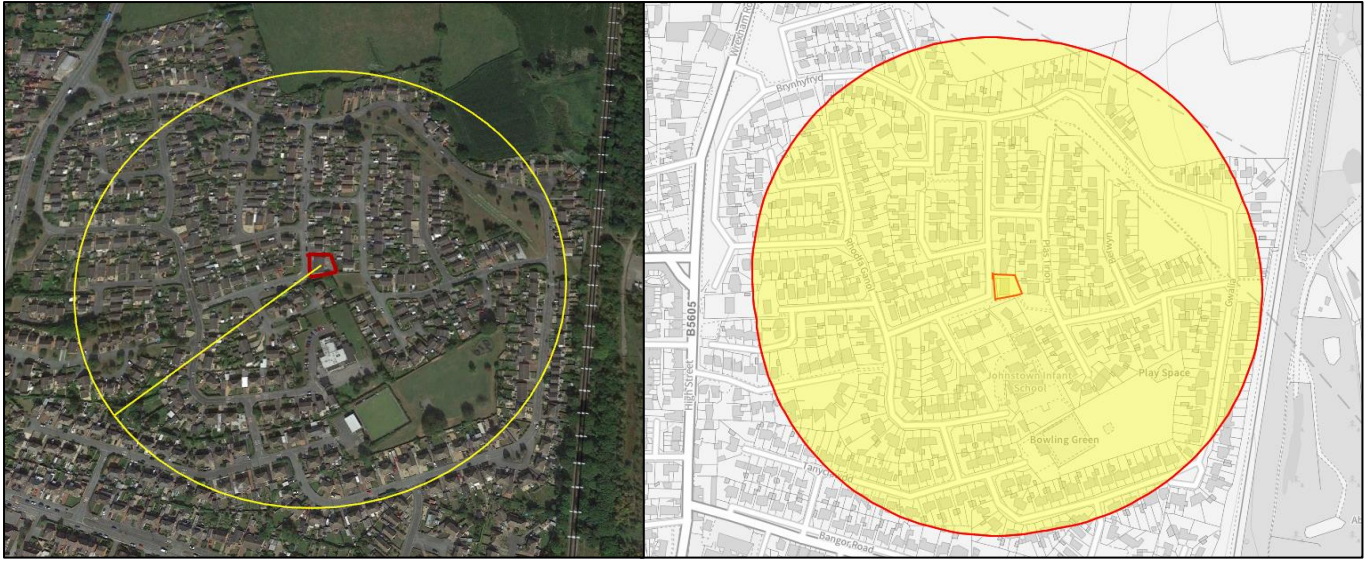


Figure 3.2 - Location of water bodies within 250m of the site (© Google Earth Pro 2023 / MAGiC 2023)

3.20 The results, conclusions and recommendations are based on a number of factors i.e.

- Practical experience of surveyor,
- Knowledge of bat / bird species relevant to the site location and geographical range,
- Nature of immediate / surrounding habitat in relation to foraging / commuting,
- Condition of the building,
- Presence / absence of a loft space or cellar and reasonable practicality of use,
- Presence / absence of roost potential,
- Value of roost potential – if present,
- Presence of suitable habitat features for GCN,
- Nature of the pond(s) / pond networks in the immediate landscape.

3.21 The results, conclusions and recommendations of this report have been assessed by Mrs. K. Wilding, the Director of Tyrer Ecological Consultants Ltd, and her assessment is consistent with that of the surveyor Mr. J. Hark.

4.0 Limitations

- 4.1 The survey was conducted outside of the active season of bats, broadly considered as April-October, therefore there was a lower probability of encountering direct evidence of bats such as droppings. Potential roost features and suitability of potential roost features can, however, be adjudged as decisively as within the active season of bats, saving time and unnecessary delay to applicants allowing surveys all year round, thus frequently the assessment can be as conclusive as if it was carried out in the active season. Timing is not, therefore, considered a constraint in this instance.
- 4.2 The survey took place within the breeding bird season (typically March – September inclusive) at a time when evidence of breeding birds is most apparent however it was early in the season. Survey timing is again not considered a constraint in this instance.
- 4.3 In considering all survey constraints, no significant limitations were experienced that might adversely influence the results, conclusions, and recommendations of this report.

5.0 Desk Study Results

- 5.1 The site of the proposed works (referred to in-part as “the application site” and “the site”) is situated within the town of Johnstown, circa 5.0 kilometres south-west of Wrexham city centre (see **Figure 5.1** below).

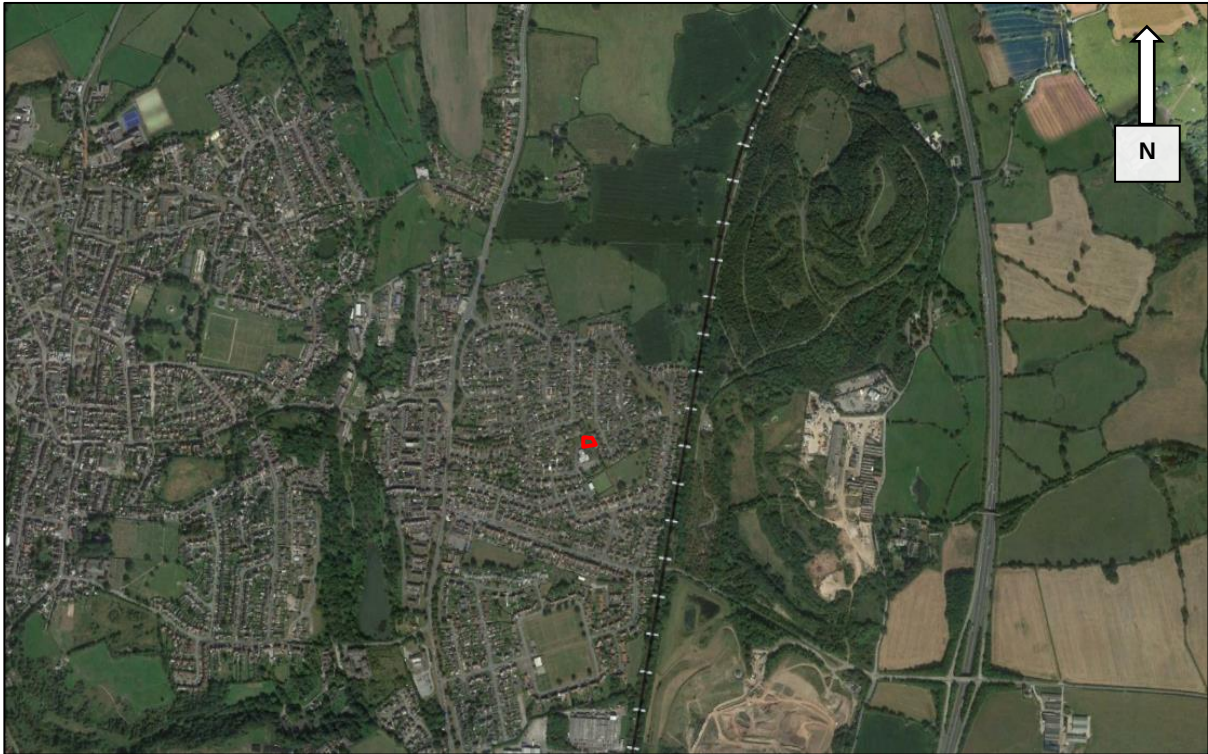


Figure 5.1 – Location of the application site (red boundary) within the landscape (© Google Earth Pro 2023/24)

- 5.2 The building has been present since at least 2006, based on historical satellite imagery. The area surrounding the site has remained similar since this time, with no new large-scale developments visible on the satellite imagery in the immediate area. The immediate area is dominated by sub-urban housing. Outside of the housing estate, to the east is the large area of secondary deciduous woodland, tussocky grassland and network of ponds which make up part of the Stryt las a'r Hafod SSSI and the Johnstown Newt Sites SAC. Further, smaller areas of the SSSI and SAC are located to the west and south of the application site.
- 5.3 A search on Cyngor Bwrdeistref Sirol Wrecsam / Wrexham County Borough Council planning portal revealed no previous planning applications for the site.
- 5.4 The immediate habitat is predominantly urban, with the village of Johnstown surrounding the application site. The habitats in this area mainly consist of domestic gardens and scattered amenity grassland.
- 5.5 The wider landscape (2.0 kilometres) is made up predominantly of agricultural pastureland, although directly east of Johnstown (300m from the site boundary) lies Bonc yr Hafod country park and Aberderfryn nature reserve (both areas included within the Johnstown Newt Sites SAC), both large areas of mosaic grassland, deciduous woodland and scrub and featuring a high number of ponds. Another area of mosaic grassland, woodland and scrub, along with more ponds, is present on the western boundary of Johnstown. Both of these habitat areas are included within the Johnstown Newt Sites SAC. Linear features are abundant within the wider landscape, in the form of small waterways, hedges and treelines.

- 5.6 As mentioned previously, linear features are prominent in the surrounding landscape, with a range of commuting pathways suitable for a number of protected species groups known to exist in proximity to the site, though it is considered that the pathways afford greatest suitability for airborne species. These include bats, with the species most likely to be present being the common pipistrelle, commonly associated with roosting in urban and sub-urban properties, and the brown long-eared bat (*Plecotus auritus*), with roosts of this species correlating with semi-natural habitat, particularly large woodland blocks where these bats will find favourable foraging habitat. A number of bird species adapted to nesting within built structures are also considered likely to be present, for example house sparrow.
- 5.7 As mentioned previously, no ponds are present within 250m of the site. However, immediately outside of the 250m buffer, to the east and west, exists multiple ponds which are part of the Johnstown Newt Sites SAC and are therefore known to support populations of GCN. The general character of the landscape between the site and the SAC ponds is one of sub-optimal nature for the terrestrial movements of GCN, being dominated by roads, buildings and domestic gardens, which present a barrier to the movements of GCN within this landscape.

NB: *Where quality habitat is present close to buildings then the percentage use of those buildings, by bats, increases given that roost opportunities are available and vice versa.*

Statutory designated sites

- 5.8 There are two statutory designated site within 2.0 kilometres of the application site (see **Table 5.1** for detailed information and **Figure 5.2** for a visual representation).

Table 5.1 – Statutory designation types and reasons for designation within 2.0 kilometres buffer

Site name	Designation type	Interest features
Johnstown Newt Sites (0.3km East, 0.5km West & 0.9km South)	Special Area of Conservation (SAC)	"The site is located in the environs of the village of Johnstown, south-west of Wrexham, at an altitude of 130m above mean sea level. It is of special interest for its population of the great crested newt <i>Triturus cristatus</i>. This species has suffered a marked decline throughout Great Britain and Continental Europe as a result of habitat loss. Great Britain is considered to support one of the strongholds for this species in Western Europe. Certain ponds, particularly at Hafod, were specifically created for amphibian conservation purposes. Surrounding areas of land support a mosaic of scrub and planted trees, grassland, and tall ruderal vegetation. These form important foraging and over wintering areas for adult and juvenile amphibians."
Stryt las a'r Hafod (0.3km East, 0.5km West & 0.9km South)	Site of Special Scientific Interest (SSSI)	Stryt Las a Hafod is the single component feature of the Johnstown Newt Sites SAC and covers the same land area.

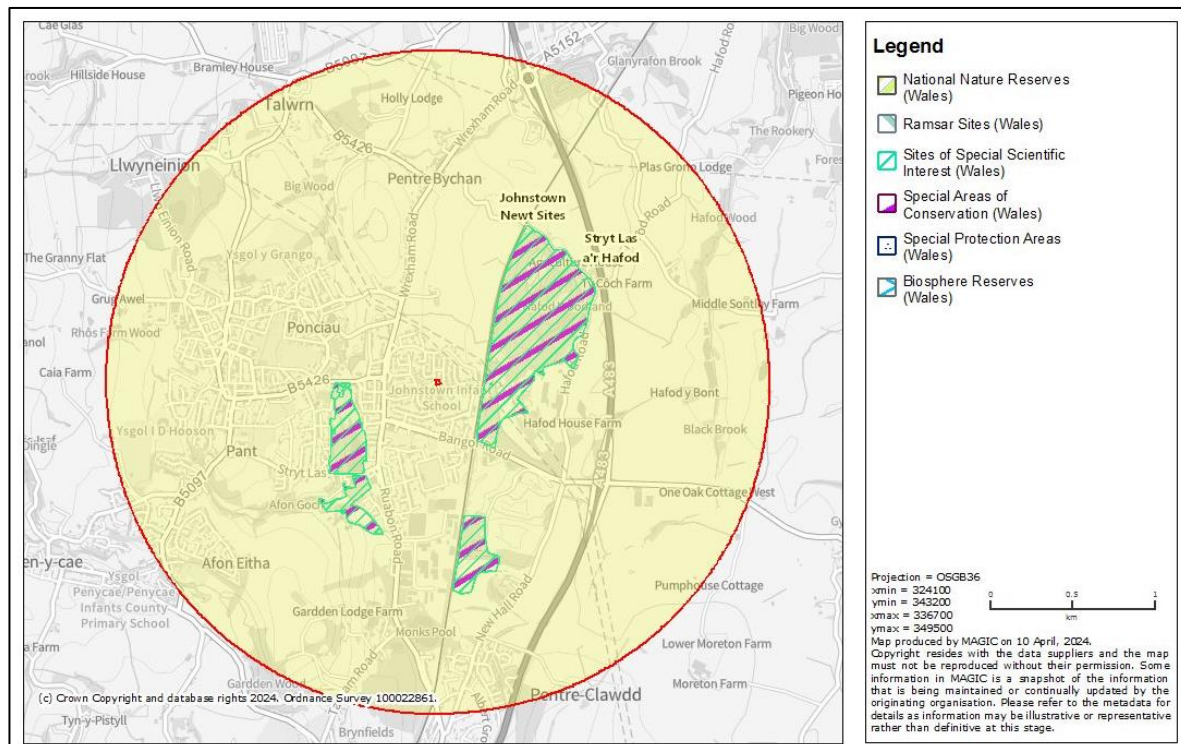


Figure 5.2 – Designated site data for the area within 2.0 kilometres of the application site (MAGiC Maps 2024)

5.9 Due to the limited scope of the works and the distance between the application site and designated sites, it is considered unlikely that the proposals will impact upon the designated sites or the species within. In relation to Reg.63 of the Conservation of Habitats and Species Regulations and with all current information and recommendations taken into account, there is considered to be no likely pathway by which the proposals could have a significant impact on the designated site.

5.10 According to the local planning guidance published by Wrexham County Borough Council, an extract of which can be seen in **Figure 5.3**, the application site is situated within the buffer zone of the Johnstown Newt Sites SAC, seen in **Figure 5.4**. The guidance states that, for a minor development, between 250m from the SAC boundary and the end of the SAC buffer zone:

“Unless the habitat lost represents key connecting habitat or important habitat type, test of significance is not required. Note to applicant will generally suffice.”

5.11 It is considered that the proposals should, however, implement standard pollution prevention measures to prevent any surface runoff from the proposals moving downhill, away from the application site.

Table 2 - Development affecting designated sites with GCN as the main feature (Johnstown Newt Site)			
Development type	Major Development	Minor Development	
	Outline/ Approved Matters/etc Mineral & Waste, Transport applications etc	Up to 10 dwellings	Extension/ Conservatory/Garage
A2 Directly affects SAC or functioning of SAC with GCN as key feature	Like for like principle; Need to provide replacement habitat capable of its purpose e.g. breeding pond prior to destruction of existing, so that the "favourable conservation status" of the population is maintained. Also need to demonstrate through a "ToLS or AA that the development will not significantly affect the Conservation Features of the SAC.		
B2 Adjacent to, and within key ecological corridors associated with Johnstown Newt Site SAC	Mitigate for loss of habitat type on a like for like basis – <i>Refer to management costs within appendix 1.</i> Also need to demonstrate through a ToLS or AA that the development will not significantly affect the Conservation Features of the SAC directly or indirectly.	Only need to undertake a ToLS dependant on suitability of site to be lost Undertake Reasonable avoidance measures (RAMs) to prevent harm to GCN (see appendix 4). This depends on suitability of site if poor e.g. hardstanding / amenity grassland then a note to applicant might suffice.	
C2 250m – extent of Johnstown SAC Buffer (appendix 2) <i>Refer to local knowledge, Cofnod and "likelihood maps" (see appendix 3)</i>	Mitigate for loss of habitat type on a like for like/50% basis – <i>Refer to Appendix 1 of management costs.</i> Also need to demonstrate through a ToLS or AA that the development will not significantly affect the Conservation Features of the SAC directly or indirectly.	Unless the habitat lost represents key connecting habitat or important habitat type, test of significance is not required. Note to applicant will generally suffice.	
D2 Outside Johnstown Newt Site Buffer (see appendix 2)	Mitigation generally not required unless key connecting habitats are affected. Indirect effects of large developments e.g. increased recreational pressure need to be assessed	N/A	N/A

Figure 5.3: An extract from the 2018 local planning guidance published by Wrexham County Borough Council.

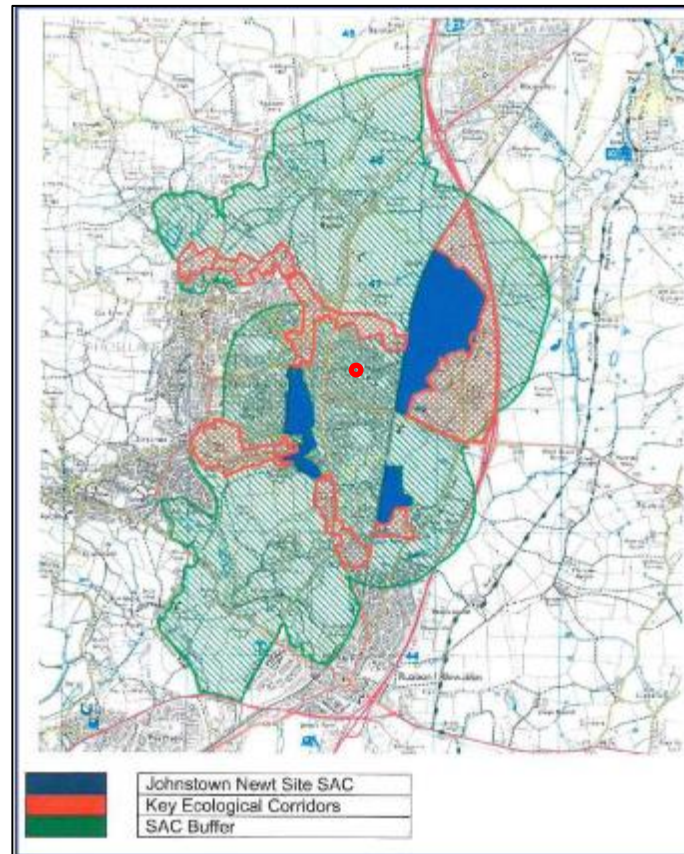


Figure 5.4 - map showing the extent of the Johnstown Newt SAC and buffer and approximate location of the application site (red circle) (Wrexham.gov.uk, 2018).

Notable species records

- 5.12 A search of extensive company records held by Tyrer Ecological Consultants Ltd from 2014 – present, all of which have been submitted to the LERC serving the area, which in this case is Cofnod, revealed the following records of bat roosts within the 2.0-kilometre area surrounding the application site:
- A day roost containing a single bat of unknown species from a site located 1.19 kilometres west of the application site, recorded in 2019.
 - A day roost of a single brown long-eared bat (*Plecotus auritus*) and two-day roosts of soprano pipistrelle (*Pipistrellus pygmaeus*) from a site located 1.92 kilometres east of the application site, recorded in 2022.
 - A roost of three common pipistrelle (*Pipistrellus pipistrellus*) from a site located 1.97 kilometres north-west of the application site, recorded in 2019.

6.0 Field Study Results

Bats

6.1 See **Figure 6.1** below for the locations of each building within the red line boundary; **Table 6.1** describes each building in relation to their suitability to offer roosting potential for bats (both externally and internally) and further information regarding evidence or lack of evidence of bats, where applicable.

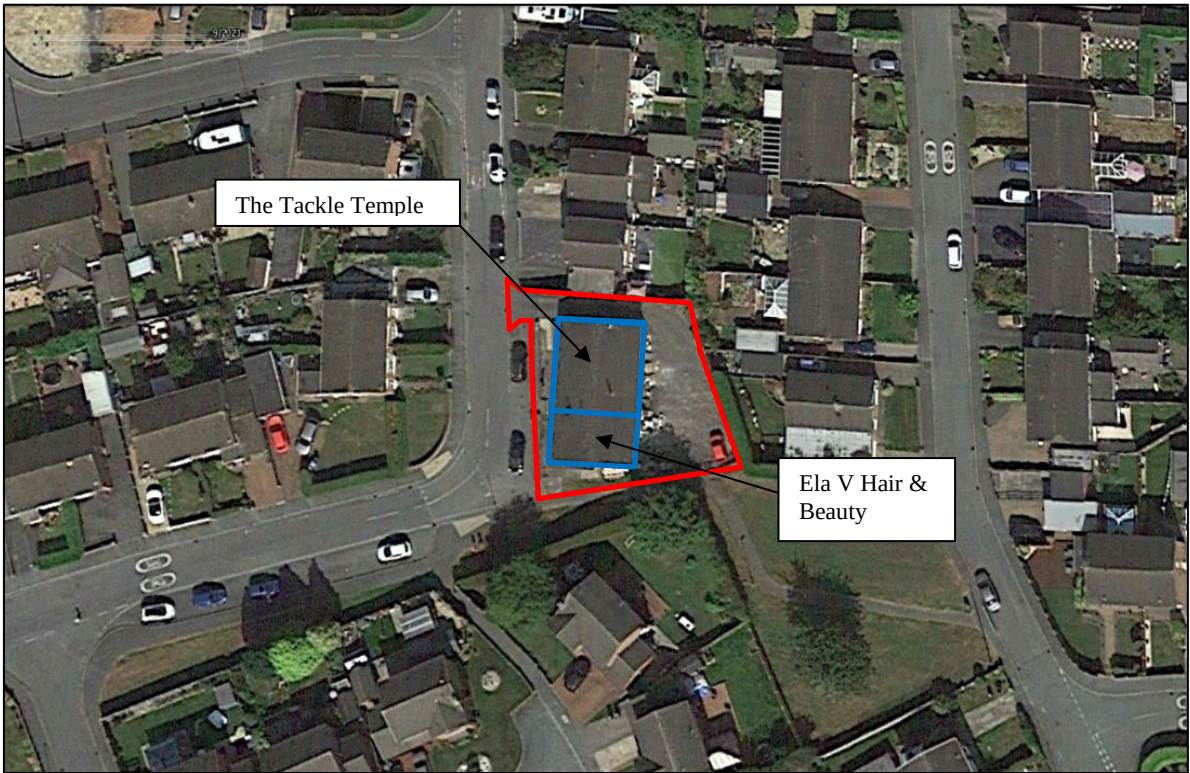


Figure 6.1 – Locations of the building within the red line boundary (Google Earth Pro 2024)

Table 6.1 – Building descriptions at the application site

The commercial building (B1)
B1 is a single-story commercial property with a pitched concrete interlocking tiled roof and an enlarged soffit construction on the front (western orientation). The overall building has the approximated maximum dimensions of 17.5 metres x 10.0 metres x 4.0 metres (length x width x height). The building features components such as brick walls, aluminium shutter doors over the shopfronts and the rear access doors and mixed timber and PVC windows at the rear with steel bars for security. The enlarged soffit box is of plywood and PVC construction and has a small section of flat roof, with a felt covering. In respect of its condition, the surveyor is not qualified to assess structural state, however the aesthetic condition of the building was adjudged to be generally good, with most areas of the structure being free of degradation, barring some damage from water ingress in the enlarged soffit, no gaps being present between bricks and the roof slates tightly fitted in most places, with few areas where gaps between tiles are present. Internally, the building it split into two separate commercial spaces, the northern premises is named “The Tackle Temple” and covers approximately two thirds of the structure. The southern premises is named “Ela V Hair & Beauty” and covers the remaining third of the building. A loft space is present

above the entire footprint of the structure, with an apex height of approximately 2m and a fink trussed rafters construction style. The loft space is separated into two spaces by a brick partition wall over the boundary between the two premises.

The loft space of The Tackle Temple appears to have been boarded within recent history, with the boarding extending through select parts of the space. The fibreglass insulation on the floor was positioned underneath the boarding but was visible in an even layer throughout the non-boarded areas. No sources of light were identified within this loft space. No evidence of bat droppings was found within the loft space.

The loft space of Ela V Hair & Beauty was of similar condition to that of the other premises, however appeared to have been boarded more recently and contained a boiler unit on the southern gable wall. The space is dry, warm, non-draughty and dark with no light ingress, with no cobwebs. No sources of light were identified within this loft space. No evidence of bat droppings was found within the loft space.

With the above in mind, it is considered that the structure has the potential to support a breeding roost of loft-dwelling species such as the brown long-eared bat, with the required high & consistent temperature and spatial characteristics present in the space. No sources of light were identified within either loft space which may indicate potential access locations for bats.

The roof is lined with a bitumen style lining; where present, traditional bitumen 1F underfelt (or similar) can improve a building's value to bats notably for crevice-dwelling bats of the *Pipistrellus* genus, whereby the bats roost between linings and the roof cover material provided external access opportunities exist. No evidence of crevice-dwelling bat species was located on the day of the survey; however, this is often the case with such species due to their crevice-dwelling nature.

NB: *The breeding roosts of Pipistrelle bats are proportionally higher in occupied residential dwellings where the warm, dry conditions favour the requirements of a maternity colony but other structures are also used, especially for hibernation or by male bats which do not need the same conditions as a maternity colony.*

Potential roosting features (PRF's) were present within the roof in the form of three areas of slightly lifted roof tiles, which present a crevice underneath, examples of this kind of PRF were evident on the centre of the western pitch and the south-eastern most extent of the eastern pitch. Additional PRF's were present in the soffit box of the eastern verge, where open spaces lead into crevices underneath the verge and into the soffit box itself at the northern and southernmost corners of the building. The brickwork of the building is well mortared, containing no PRF's. Both gable verges have PVC fittings which cover the edge tiles and a soffit box below. At the centre of the northern gable, one of the boards making up the soffit has started to come loose and presents a small gap underneath, presenting a PRF.

With the presence of a small number of low value PRF's within the roof structure, which is located within an urban area, B1 is duly categorised as pertaining to '**Low**' bat roost suitability in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

- 6.2 There are no trees within the red line boundary of the site, with no recommendations therefore made in this respect. Several trees and hedgerows are present beyond the boundary features, however, and these should be considered valuable in a local context in that they provide valuable foraging / commuting habitat for bats, offering shelter, cover and habitat connectivity when in foliage.

Breeding Birds

- 6.3 In relation to WCA Schedule 1 specially protected bird species, such as barn owl, no evidence to indicate use of the buildings was encountered, and neither of the structures on site provide suitable nesting platforms for this species, or other Sch.1 listed raptor species likely to be present in the immediate and wider landscape.
- 6.4 Regarding more common bird species, the aforementioned PRF's within the soffit boxes could provide bird species adapted to urbanisation with suitable nesting platforms. No nesting potential is present within the rest of the site.

Great crested newt

- 6.5 Important elements to consider when assessing likely impacts against GCN includes:
1. The scale, nature and magnitude of proposals,
 2. Site proximity to a potential breeding pond and to any additional ponds,
 3. Habitat linkage / barriers between potential breeding ponds and the site,
 4. Nature and extent of available terrestrial habitat around the pond,
 5. Area of site habitat loss,
 6. Nature of habitat to be lost and potential value to GCN,
 7. Most up to date Government guidance considering EPS.
- 6.6 As discussed in the desktop study, there were no ponds found within the site or identified from within 250m.
- 6.7 In a terrestrial contextual assessment, large areas of the site are considered broadly unsuitable for this species, being comprised of hardstanding and closely cropped amenity grassland. Suitable features for GCN are present in the form of a stack of bricks against the eastern wall of the building, which contains few gaps and crevices which may provide refugia opportunities to GCN, if present in the landscape.
- 6.8 The combination of an absence of ponds within and surrounding the site (up to 250 meters), in addition to the perceived unsuitability of the surrounding urban environment which pose significant barriers to dispersal, despite low value refugia opportunities, the presence of GCN within the zone of influence of the site is considered unlikely, but cannot be ruled out entirely owing to the network of specially protected areas for amphibians within the wider area.

7.0 Conclusions & Recommendations

Habitats

- 7.1 The site covers a commercial building with a hard standing car park at the rear along with a small area of amenity grassland close to the southern gable of the building. The works to be completed involve a vertical extension of the whole building to include a second floor, and the conversion of part of the hard standing car park into residential gardens. No habitat will be lost through the works.

Bats

- 7.2 Based upon the findings of the survey, covered through **sections 5.0 – 6.0** of the report and supported by **Appendix I, B1** is determined to offer '**Low**' bat roost suitability bat roost suitability, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023), See **Figure 7.1**.

Table 7.1. Recommended timings for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees where other methods such as PRF inspection are not possible, but unlikely to give confidence in a negative result). To be used in tandem with Table 7.2.		
Low roost suitability or PRF-I	Moderate roost suitability	High roost suitability or PRF-M
May to August (structures)	May to September ^a , with at least one of surveys between May and August ^b	May to September ^a , with at least two of surveys between May and August ^b
No further surveys required (trees)		

Figure 7.1 – BCT extract on roost suitability criteria

- 7.3 It is recommended that **one dusk / emergence survey** is conducted during the active season of bats (May – August, extending into September), in order to establish if / how the building is being used by bats, and if so, identify the species present, abundance, roost locations and flight lines around the site following emergence surveys. A total of **2 surveyors** would be required to cover all elevations host to roost potential.
- 7.4 The applicant should be aware that, if during further surveys, evidence is gathered that confirms bat(s) or their roost(s) are found on site and will be impacted upon, then a Mitigation licence will be required to legally commence with the proposals. Furthermore, should bats be observed to emerge from the building during the emergence survey, an additional survey may be required to further understand the use of the building by bats and to provide a population size class assessment.
- 7.5 Natural Resources Wales provide online information and guidance concerning the requirement for EPSDL's and the following extract is included in that guidance:

"When would works require a licence?"

A licence is required for anything that would be an offence under the Regulations (covered in section 2.9 of this report). For example, this could include works which would disturb (as defined in the legislation) bats, damage a bat roost, or damage or destroy a breeding site.

NRW can only grant a licence if the following three tests are met:

1) The purpose of the work is for preserving public health or public safety or other imperative reasons of over-riding public interest (IROPI) including those of a social or economic nature and beneficial consequences of primary importance for the environment,

2) There is no satisfactory alternative,

3) The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range; this last test might require that the work is modified to avoid or minimise adverse effects (mitigation), or that an alternative breeding site/resting place or habitat is provided instead to safeguard the FCS (compensation). Either way, you will need the advice of an ecological consultant. Along with filling in the licence application form, the ecological consultant will need to write a method statement (within the EPSML) explaining how the work will be done to minimise any detrimental effects.

If the consultant ecologist, on the basis of survey information and specialist knowledge of the species concerned, considers that on balance the proposed activity is reasonably unlikely to result in an offence being committed then no licence is required. However, in these circumstances Natural Resources Wales would urge that reasonable precautions be taken to minimise the effect on European protected species should they be found during the course of the activity. If protected species are found, cease the work until you have assessed whether you can proceed without committing an offence.

When might I work without a licence?

There might be situations in which you could continue without a licence. If the work can be organised in such a way that there would be no offences committed (i.e. no damage or destruction of a breeding site/resting place, no capturing, killing or injuring of individuals) then there is no need for a licence. This is a difficult area legally and your ecological consultant will be able to advise you further.

Developers should be aware that if work is held up or modified and there is a possibility that animals will be disturbed, or a breeding site / resting place will be unavailable to them (even if only temporarily), they should apply for a licence in good time.

Example: If a building with a bat roost requires re-roofing or repair work, you would not need a licence if:

- the existing materials are replaced like-for-like (i.e. similar type of roofing slates, similar felt or membrane),*
- the same access points are retained and there are no structural changes made to the roost,*
- the work is done whilst bats are absent and is completed before they would normally return to the roost."*

7.6 Where more detailed bat surveys are recommended by the Ecologist, following an initial daytime investigation, then Local Planning Authorities, on the advice of their ecological advisors, may not determine the application until such time that all relevant information is gathered, i.e., by conducting dusk / dawn surveys. The advice that is provided by the ecological advisors is also in accordance with the obligations placed upon Local Authorities by way of its duties under the Conservation of Habitats & Species Regulations 2017 (as amended). Therefore, it would be prudent to make enquiries to the relevant departmental Planning Officer before submitting a Planning Application that includes an ecological survey report that recommends more detailed surveys.

7.7 Installation of overly harsh artificial lighting as part of any future development that exceeds current levels may have a negative impact upon foraging / commuting bats in the landscape,

subject to their presence, particularly if increased light spillage occurs in areas of that are currently free from illumination. A bat-sensitive lighting plan is therefore recommended in order to avoid potential impacts to bats that may use the gardens and grassland present in the surrounding area. Several options to consider have been listed below, though the reader is referred to the Bat Conservation Trust's 'Bats and Artificial Lighting at Night' guidelines (August 2023) for further information (see **Table 7.1**).

Table 7.1 – Extract from *Bats and Artificial Lighting at Night*, BCT (August 2023)

Appropriate luminaire specifications: Light sources, lamps, LEDs and their fittings come in a myriad of different specifications which a lighting professional can help to select. However, the following should be considered when choosing luminaires and their potential impact on Key Habitats and features:

- All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used
- LED luminaires should be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability
- A warm white light source (2700Kelvin or lower) should be adopted to reduce blue light component
- Light sources should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone, 2012)
- Internal luminaires can be recessed (as opposed to using a pendant fitting) where installed in proximity to windows to reduce glare and light spill
- Waymarking inground markers (low output with cowls or similar to minimise upward light spill) to delineate path edges
- Column heights should be carefully considered to minimise light spill and glare visibility. This should be balanced with the potential for increased numbers of columns and upward light reflectance as with bollards
- Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be considered - See ILP GN01
- Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt
- Where appropriate, external security lighting should be set on motion-sensors and set to as short a possible a timer as the risk assessment will allow. For most general residential purposes, a 1 or 2 minute timer is likely to be appropriate
- Use of a Central Management System (CMS) with additional web-enabled devices to light on demand
- Use of motion sensors for local authority street lighting may not be feasible unless the authority has the potential for smart metering through a CMS
- The use of bollard or low-level downward-directional luminaires is strongly discouraged. This is due to a considerable range of issues, such as unacceptable glare, poor illumination efficiency, unacceptable upward light output, increased upward light scatter from surfaces and poor facial recognition which makes them unsuitable for most sites. Therefore, they should only be considered in specific cases where the lighting professional and project manager are able to resolve these issues.
- Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed. However, due to the lensing and fine cut-off control of the beam inherent in modern LED luminaires, the effect of cowls and baffles is often far less than anticipated and so should not be relied upon solely.

Breeding Birds

- 7.8 No impacts are applicable in relation to any Sch.1 (WCA) specially protected bird species such as barn owl due to the absence of suitable nesting habitat within the affected areas, and no further surveys or recommendations are necessary in relation to specially protected birds.
- 7.9 In relation to common birds the building could feasibly offer small birds, adapted to urbanisation, nesting habitat, particularly during the breeding bird season, however no evidence of breeding birds was encountered during the survey.

- 7.10 In the interests of potential impact avoidance it is recommended that proposed works should be undertaken outside of the nesting bird season. The nesting bird season is weather dependent but generally extends between March and September inclusive (peak period March-August). For works within the breeding bird season, any areas that can support nesting birds should be checked by a professional Ecologist for nesting birds within 48 hours or less prior to works commencing.
- 7.11 Where active nests are / have been located by the Ecologist, then any works which may affect them would have to be delayed until the young have fledged and the nest has been abandoned naturally, this can be aided, for example, via implementation of appropriate buffer zone(s) around the nest site (typically 5 – 10 metres) in which no disturbance is permitted until the nest is no longer in use. This would have to be coordinated through the expert judgement of the professional ecologist and species pending.
- 7.12 Point 3.24 of the British Standards Publication 42020:2013 defines a professional ecologist as: *"a person who has, through relevant education, training or experience, gained recognised qualifications and expertise in the field of ecology and environmental management."*

NB: *All wild birds (with only minor exceptions) and their nests whilst being built or containing eggs or dependant young are protected from destruction, damage and disturbance under the Wildlife & Countryside Act 1981 (as amended). It is a punishable offence to interfere in any way with an active nest.*

Great Crested Newt

- 7.13 No ponds were identified within the site, or from within a 250m buffer.
- 7.14 As derived from the desktop assessment, evidence of GCN in the locale is present. The Stryt las a'r Hafod SSSI and Johnstown Newt Sites SAC, both of which are statutory protected sites for their significant populations of GCN, are located circa 300m from the application site, at their closest point. However, the habitat present in the 300m between the application site and these designated sites is considered to be negligible, consisting of sub-urban housing, gardens and roads, presenting little suitable habitat and significant barriers to commuting for GCN. It is considered unlikely that GCN will be present on site, although it cannot be discounted due to the surrounding high-quality populations.
- 7.15 Given the presence of the designated sites in the surrounding landscape and the small amount of potentially suitable refugia, in form of stacked bricks, on site, which could harbour GCN in their terrestrial phase, it is recommended that a precautionary reasonable avoidance measures (RAMs) approach is enacted at the site is any works are planned to these features.
- 7.16 Any amphibians should be handled with wet gloves to prevent impact / injury, and if any of the above features are set to be removed they should be done so via soft demolition / hand only.
- 7.17 Should any amphibians be encountered within the works area, they should be handled with wet gloves to prevent impact / injury and moved to an area of like for like habitat outside of the works area away from potential harm.
- 7.18 The applicant and all contractors would be aware that if at any stage newts are encountered during works, or at any other stage of the programme of works, such works would be required to immediately cease and an Ecologist would be made aware as to provide further guidance, if an Ecologist is not already present.
- 7.19 The applicant should be aware that where it is discovered great crested newts would be impacted by the proposals, a development licence (options include traditional development mitigation licence, low impact class licence or other) informed by survey data and a suitable

mitigation strategy may be required to legally proceed with the works. In some cases, a licence may not be necessary where risks can be avoided, minimised or mitigated for through reasonable avoidance measures (RAMs), if the consultant Ecologist, on the basis of survey information and specialist knowledge of the species concerned, considers that on balance the proposed activity is reasonably unlikely to result in an offence being committed.

Biodiversity Enhancement

- 7.20 As a means of enhancement and aiding the design of the scheme in keeping with local and national planning policy considering biodiversity net-gain principles, the proposals may consider incorporating wildlife friendly provisions in addition to those described. Further recommendations, regarding birds, native botanical species and invertebrates are provided within **Appendix II**.

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Appendix I: Site Photographs



Plate 1 – West-facing frontage of Ela V Hair & Beauty and The Tackle Temple.



Plate 2 – The northern gable of The Tackle Temple.



Plate 3 – *The southern gable of Ela V Hair & Beauty.*



Plate 4 – *The east-facing rear doors and windows of Ela V Hair & Beauty and The Tackle Temple.*



Plate 5 – *character of the rear car park area..*

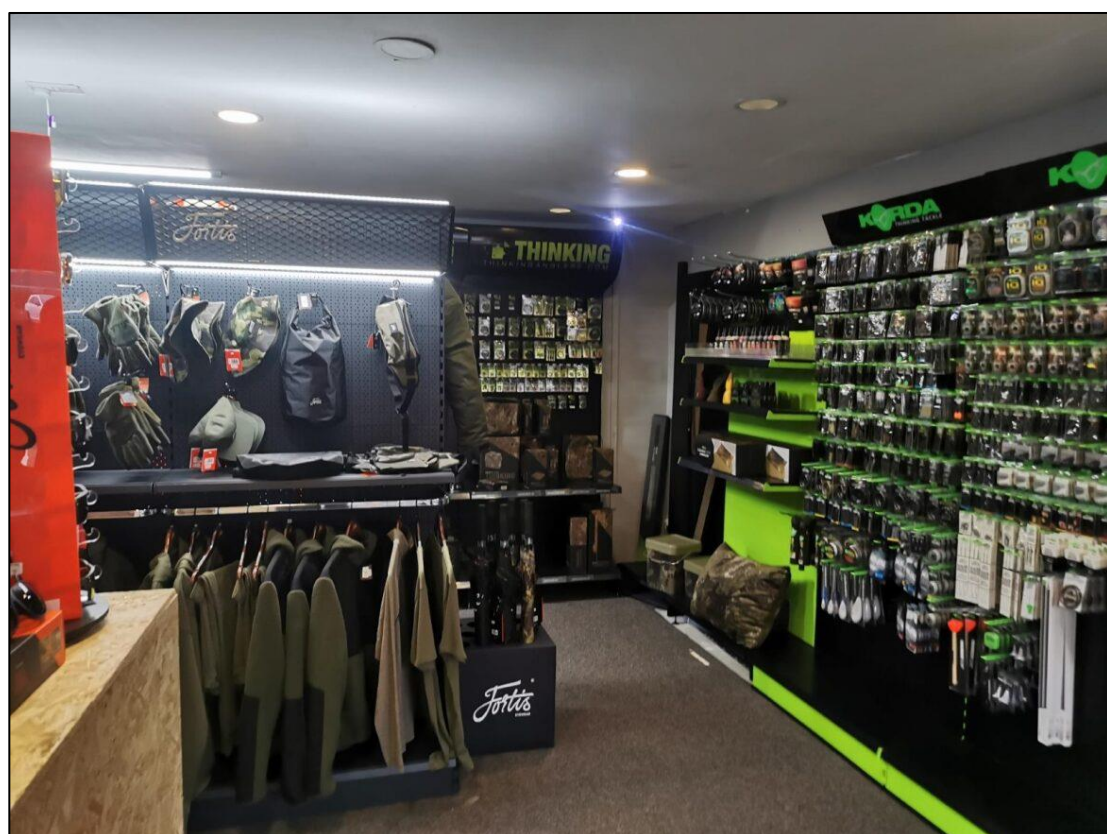


Plate 6 – *Internal character of The Tackle Temple.*

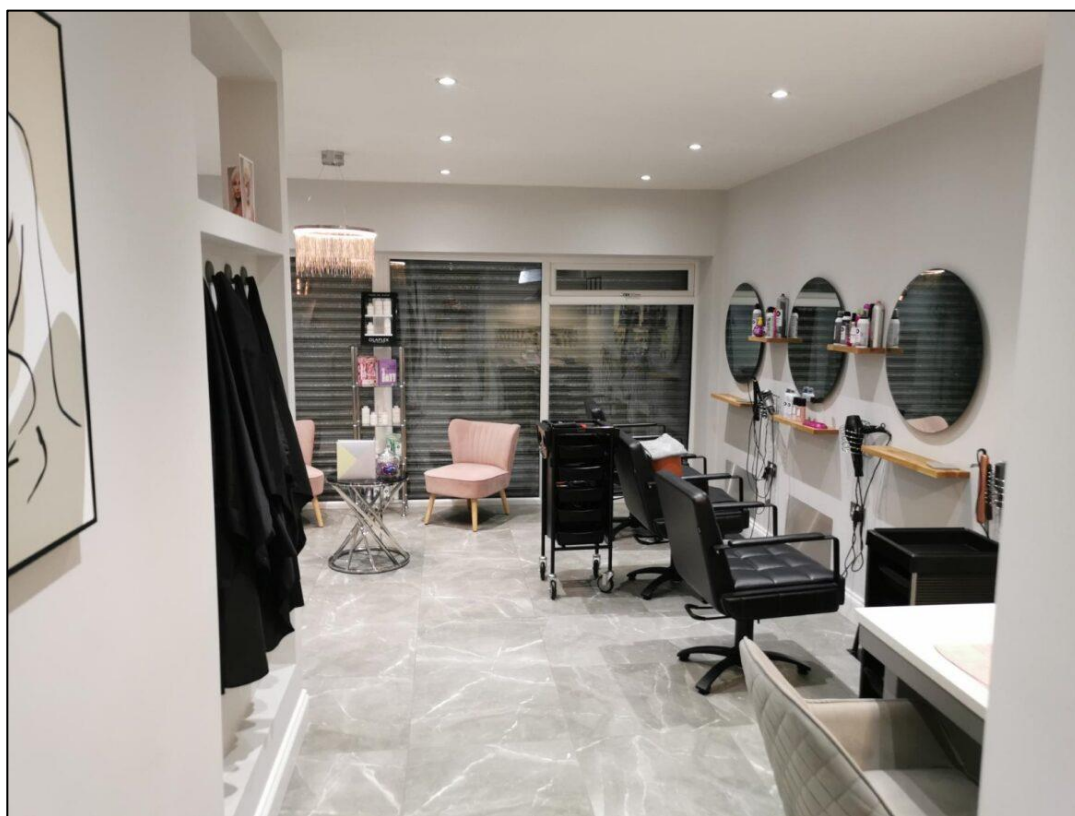


Plate 7 – *Internal character of Ela V Hair & Beauty*

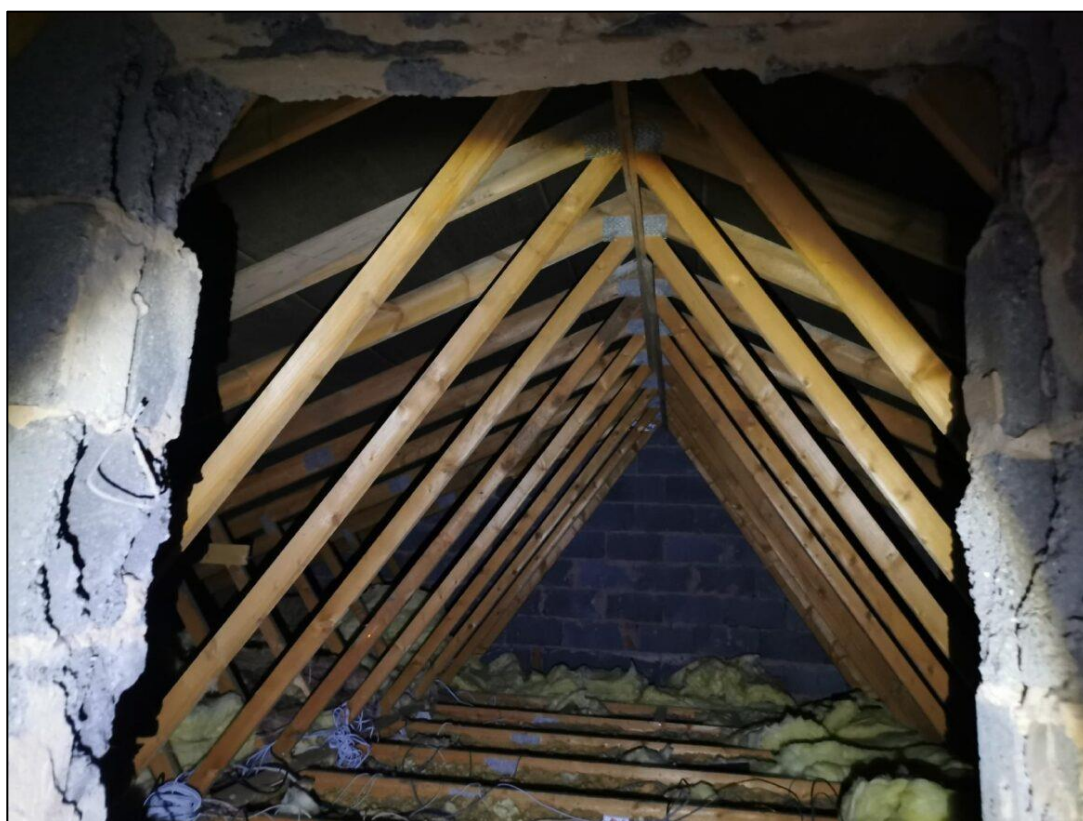


Plate 8 – *The internal loft character of the space above The Tackle Temple.*

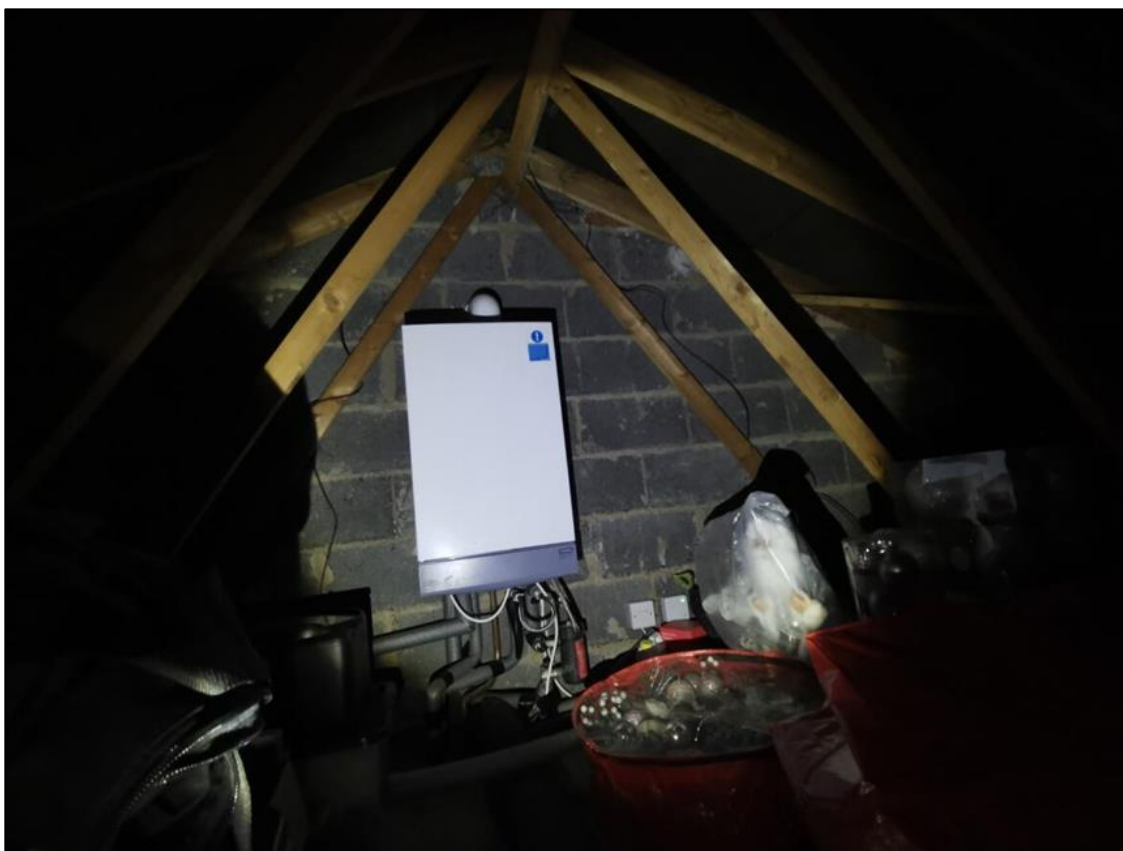


Plate 9 – *The internal loft character of the space above Ela V Hair & Beauty.*



Plate 10 – *A PRF consisting of a gap behind the fascia board on the north-eastern extent of the building.*



Plate 11 - PRFs under the verge roof tile and behind the fascia board on the south-eastern extent of the building.



Plate 12 - A PRF consisting of a lifted fascia board.



Plate 13 - A view showing the locations of PRF's in the form of slightly lifted roof tiles (red circles).

Appendix II: Biodiversity Enhancement: General Recommendations

Breeding Birds – House Sparrow

The sparrow terrace has been designed to help redress the balance of falling house sparrow numbers. The current UK population is now half of what it previously was in 1980 and this is widely attributed to habitat destruction and lack of suitable nesting spaces. House sparrows are social birds and like to nest in company, therefore, this terrace provides ideal nesting opportunities for three families. The terrace can be fixed on to the surface of a suitable wall or incorporated into the wall. It is suitable for all types of buildings.



Breeding Birds - Other

This traditional design has proved to be highly effective in attracting Robins, as well as other small species such as Black Redstart, Spotted Flycatcher and Wren. It is designed to be installed on the walls of houses, barns, garden sheds or other buildings and should be hung so that the entrance is to one side (at an angle of 90° to the wall). The front panel can be easily removed for cleaning.

This type of box should not be made conspicuous on a tree or bush because small predators can enter through the unprotected opening. By hanging on a wall, predators won't be able to reach the box. Alternatively hide the box in Ivy, Honeysuckle or other climbing plants.



Invertebrates - Bee bricks

The Bee Brick can be used in place of a standard brick or block in construction to create habitat for solitary bees. Alternatively, it can be used as a standalone bee house in your garden or wild patch. It will provide much needed nesting space for solitary bee species such as red mason bees and leafcutter bees, both of which are non-aggressive.

Each Bee Brick contains cavities in which solitary bees can lay their eggs before sealing the entrance with mud and chewed-up vegetation. The offspring will emerge the following spring and the cycle will begin again. Each cavity goes part way into the brick, which is solid at the back. Bee Bricks should be placed in a warm sunny spot on a south-facing wall at a minimum height of 1m, with no vegetation obstructing the holes. It is highly recommended that bee-friendly plants should be located nearby so that the bees using the bricks have food, otherwise it is unlikely that the brick will be used. Available in a choice of four colours: white grey, dark grey, yellow and red.



Specification:

- * Material: Concrete
- * Origin: Cornwall, UK
- * Dimensions: W 215mm x D 105mm x H 65mm
- * Weight: 2.9kg
- * Colours: White grey, yellow, dark grey and red

Native Planting and/or Landscaping

New feature landscaping should incorporate native woody plants as opposed to non-native species that are of significantly less benefit to biodiversity. Species such as Blackthorn (*Prunus spinosa*), Honeysuckle (*Lonicera periclymenum*), Rowan (*Sorbus aucuparia*), Guelder-rose (*Viburnum opulus*) and Hawthorn (*Crataegus monogyna*) are native and will provide a valuable resource for a myriad of wildlife as opposed to non-native, exotic species which are generally much less effective, particularly to pollinator groups including bees, butterflies and moths.

Suitable Trees	Suitable Woody Shrubs
English Oak (<i>Quercus robur</i>)	Hawthorn (<i>Crataegus monogyna</i>)
Rowan (<i>Sorbus aucuparia</i>)	Honeysuckle (<i>Lonicera periclymenum</i>)
Wild Service Tree (<i>Sorbus torminialis</i>)	Guelder Rose (<i>Viburnum opulus</i>)
Silver Birch (<i>Betula pendula</i>)	Elder (<i>Sambucus nigra</i>)
Ash (<i>Fraxinus excelsior</i>)	Wild Privet (<i>Ligustrum vulgare</i>)
Goat Willow (<i>Salix capraea</i>)	Blackthorn (<i>Prunus spinosa</i>)
Beech (<i>Fagus sylvatica</i>)	
Wild Cherry (<i>Prunus avium</i>)	