



Client – Michael Nathan

Site – Former HSBC Bank

Reference – 20230066-Bat

Location – Cefn Mawr, Wrexham

Central Grid Reference – SJ 28089 42307

Date – 29th August 2023

Bat Survey

Author: Steven Whitcher, MCIEEM

Revision: 1

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Disclaimer

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In line with Chartered Institute of Environmental and Ecological Management (CIEEM) recommendations the findings of this survey are deemed valid for 18 months from the date of the survey.

1. Summary

Purpose	Planning permission is being sought for the conversion of the former HSBC Bank on Well Street in Cefn Mawr into two residential properties, reference P/2023/0233. Arbtech carried out bat surveys of the building during 2020, in support of the planning application. The surveys included a Preliminary Roost Assessment and subsequent bat activity survey. An updated bat survey of the building was commissioned to update the findings and to advise on the requirements during the development of the site.
Results	A desktop data search for existing records of bats was carried out in support of the Arbtech 2020 surveys and therefore an updated data search was not carried out. The building was assessed to provide a moderate potential to support roosting bats due to voids in the walls, missing cement in the verge and gaps around the roof. The building was confirmed to support two bat roosts due to bats droppings identified in two areas of the loft space. The land surrounding the building was assessed to provide a moderate value foraging and commuting habitat for bats due to the presence of areas of vegetation to the east and the connectivity this provides into the wider surrounding area. No bats were identified to emerge from roosts in the building although bat activity from several species of bat was identified in close proximity to the building. Foraging and commuting activity was identified in close proximity to the building, notably to the east where there are areas of vegetation. No significant commuting routes were identified and the level of foraging activity was generally low.
Recommendations	It is recommended that the works are carried out in a manner that will retain the existing roof and maintain the roof void in an unaltered manner. If works can be carried out in this manner it is recommended that the works commence without the requirement for a Natural Resources Wales licence, although it is recommended that the works are carried out under a strict Reasonable avoidance Method Statement, outlining measures to ensure that the roosts present in the building remain undisturbed. If it is not possible to carry out the works in a manner that will retain the existing roof and roof void it is recommended that no works commence on the building until a Natural Resources Wales licence has been obtained to cover the works. It is recommended that a sensitive lighting scheme is implemented during all phases of the development, in line with BCT and Institute of Lighting Professionals (ILP) Guidance (2018).
Conclusions	If the works are carried out in a manner that will retain the roosts in an undisturbed manner throughout the development the impact on roosting bats will be negligible. If any works that require disturbance of the roosts are preceded by further surveys and carried out under licence from NRW the impact of the development on roosting bats will be minimal. If a sensitive lighting scheme is implemented during the development the impact on foraging and commuting bats will be negligible.

2. Introduction

2.1. Purpose

2.1.1. Planning permission is being sought for the conversion of the former HSBC Bank on Well Street in Cefn Mawr into two residential properties, reference P/2023/0233.

2.1.2. Arbtech carried out bat surveys of the building during 2020, in support of the planning application. The surveys included a Preliminary Roost Assessment (PRA), which assessed the building to provide a low potential for roosting bats, and subsequent bat activity survey.

2.1.3. An updated bat survey of the building was commissioned to update the findings and to advise on the requirements during the development of the site.

2.2. Site Location and Description

2.2.1. The site comprises the former HSBC Bank, located on Well Street in Cefn Mawr.



Figure 1: Showing the building covered by this survey.

2.2.2. The building comprises a semi-detached, previously commercial, property that is three-storey to the west and extends to four storeys to the east. The building is disused and has been empty for some time.

2.2.3. The walls of the building comprise cavity brick walls with a commercial frontage on the ground floor to the west. Decorative brickwork is present around the eaves on the western elevation with wooden sash windows present throughout that elevation.

2.2.4. To the east there is a two-storey extension to the building. The eastern elevation displays wooden fascia boards to the eaves and wooden windows with metal bars.

2.2.5. The roof of the building comprises a tiled pitched roof with dormer windows in both elevations. The roof over the extension to the rear comprises a sloping tiled roof with stone coping stones to the south.



Figure 2: The western elevation of the building.



Figure 3: The eastern elevation of the building.



Figure 4: The loft space of the building.

2.2.6. Internally the building has a single loft space that extends throughout the roof void. The loft space displays purlin and rafter timbers with a bituminous lining felt on the inside of the roof tiles.

2.2.7. The land immediately surrounding the building comprises areas of scrub and trees to the east with further residential and commercial properties and public roads to the north, south and west.

2.2.8. The wider surrounding area comprises a mixture of urban and rural land with significant areas of woodland and the River Dee located a short distance (300m) to the east.



Figure 5: Showing the location of the building in context with the surrounding area.

2.3. Proposals

2.3.1. The proposals are to convert the building into two residential properties, including modifications to the existing extension to the rear of the property.

2.3.2. The plans in Appendix I show the existing and proposed elevations of the building.

3. Methodology

3.1. Desk Study

3.1.1. A desk study for existing records of bats within 2km of the site was carried out in support of the original PRA, carried out during 2020. Therefore, an additional data search was not carried out in support of this survey.

3.2. Preliminary Roost Assessment

3.2.1. A field survey of the site was undertaken by Steven Whitcher (MCIEEM) on the 23rd August 2023. The Preliminary Roost Assessment was carried out in accordance with the Bat Conservation Trust (BCT) Good Practice Guidelines, 3rd edition (2016) and was also advised by BTHK Bat Roosts in Trees - A Guide to Identification and Assessment for Tree-Care and Ecology Professionals (2018).

3.2.2. The weather at the time of the survey was cloudy and still (BWS-0) with a temperature of 20°C.

3.2.3. During the survey all buildings, structures and trees were searched for bat roosting potential or evidence of existing roosts, including:

- Checking buildings, structure and trees for cracks, voids or other Potential Roost Features (PRF).
- Looking for signs of staining or worn areas indicating a roost entrance.
- Searching for droppings, foraging remains such as wings or other field signs.

3.2.4. The inspection included a visual inspection using a bright torch (1 million candle power), ladders and also an inspection with binoculars, a pole camera and an endoscope, where applicable.

3.2.5. The habitat around the site was also assessed for its suitability to support foraging and commuting bats by looking at the value of the surrounding habitat and the connectivity of the site to the wider area.

3.3. Bat Activity Survey

3.3.1. A single bat activity survey was carried out, in accordance with the BCT Good Practice Guidelines (2016) for a building with low potential to support roosting bats.

3.3.2. The survey was carried out by surveyors and Night Vision Aids (NVA), sufficient to fully cover the areas of potential around the building. The surveyors were equipped with an Anabat Walkabout or Anabat Scout bat detector and recorded all bat movements throughout the survey.

3.3.3. The NVA comprised Canon XA10 cameras with infrared illuminators or NightFox Whisker or Red Fox units. The cameras recorded all activity throughout the survey. An Anabat Express was placed with each camera and recorded throughout the survey.

3.3.4. In line with current guidance the survey extended from 15 minutes before sunset until 1 hour 30 minutes after.

3.3.5. The surveyors present during the survey are outlined in Table 1 below.

Table 1: Surveyors for the 23rd August 2023 survey

Bat Activity Survey, 23rd August 2023	
<i>Surveyor</i>	<i>Licenced or Agent</i>
Steven Whitcher	Licenced
Bek Stobbart	Agent

3.3.6. During the activity survey notable bat foraging and commuting was recorded.

3.4. Limitations/Constraints

3.4.1. The PRA was carried out as a daytime survey and therefore does not provide accurate information on bat emergence or entry or on foraging and commuting activity in the surrounding area.

3.4.2. Bat activity survey provides a snapshot of activity at the time of the survey. Therefore, given that bats use numerous roosting locations throughout the year, the results may not identify some roosting locations if no bats are present in the roost at the time of the survey.

4. Results and Interpretation

4.1. Desk Study

4.1.1. A desk study was carried out in support of the Arbtech PRA, carried out during 2020. A copy of the report was not available although the subsequent Arbtech bat emergence survey report makes no mention of existing records of bats within the building.

4.2. Preliminary Roost Assessment (PRA)

4.2.1. The walls of the building were found to be in a generally good condition although occasional shallow voids were identified on the western elevation, where part of the shop front has been removed.

4.2.2. The window frames around the building were found to be intact although the frames displayed deterioration with flaking paint and several of the windows broken.

4.2.3. The decorative brickworks around the eaves to the west of the building were found to be in a good condition providing minimal opportunities for bats to access the eaves of the building.



Figure 6: Shallow voids in the western elevation.



Figure 7: Decorative brickwork at the eaves to the west.

4.2.4. To the east the eaves displayed a small wooden fascia board that was in a deteriorating condition with occasional voids identified leading behind the fascia.



Figure 8: The eastern elevation of the building.



Figure 9: Voids around the verge of the building.

4.2.5. Voids were identified around the verge of the building due to areas of missing cement providing potential for bats to access the void between the roof tiles and lining felt.

4.2.6. The roof of the building was found to be in a generally good condition with tight fitting roof tiles and the ridge tiles in place. Occasional missing or slipped tiles were identified, in both the main roof and the sloping roof over the extension, providing potential for bats to access between the roof tiles or under the ridge tiles.



Figure 10: Missing and slipped roof tiles in the extension.



Figure 11: Voids under the ridge tiles of the building.

4.2.7. The loft space displayed bituminous felt that was found to be in a good condition. Cobwebs were present throughout the space, particularly along the ridge board.

4.2.8. Bat droppings were identified in two areas of the loft space during the surveys.

4.2.9. To the south approximately 50-100 fresh bat droppings were identified on the top of a small tank at the gable end with an additional 20-30 bat droppings on the floor in front of the tank. The droppings were concentrated underneath the ridge with no bats visible at the time of the survey.



Figure 12: The south of the roof void, droppings circled.



Figure 13: Bat droppings on the tank.

4.2.10. To the north an additional 50-100 fresh bat droppings were identified on the loft floor underneath the ridge. No bats were visible in the area of the droppings at the time of the survey.



Figure 14: The north of the roof void, droppings circled.



Figure 15: Bat droppings on the loft floor.

4.2.11. No other bat droppings were identified throughout the loft space to imply light sampling or foraging behaviour.

4.2.12. Overall, the building is assessed to display a moderate potential to support roosting bats due to minor voids in the walls, missing cement in the verge and gaps around the roof. The building is also confirmed to support two bat roosts with the roost locations assessed to be the void between the roof tiles and lining felt.

4.2.13. The land surrounding the building was assessed to provide a moderate value foraging and commuting habitat for bats due to the presence of areas of vegetation to the east and the connectivity this provides into the wider surrounding area.

4.3. Bat Activity Survey – 23rd August 2023

Table 2: Times and weather conditions for the survey.

Sunset	20:23	Start Time	20:08	Finish Time	21:53
Weather, Start					
Temperature	20°C	Wind Speed (BWS)	0	Cloud Cover	100%
Description	Cloudy, warm and still.				
Weather, End					
Temperature	19°C	Wind Speed (BWS)	0	Cloud Cover	100%
Description	Remaining cloudy, warm and still.				

4.3.1. The plan in Appendix II of this report shows the surveyor locations and bat activity recorded during the survey.



Figure 16: Camera C1 at the start of the survey.

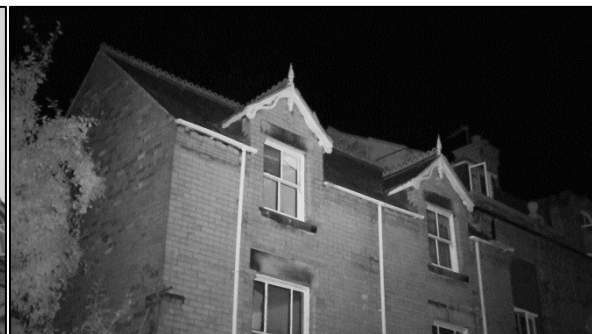


Figure 17: Camera C1 at the end of the survey.



Figure 18: Camera C2 at the start of the survey.



Figure 19: Camera C2 at the end of the survey.

4.3.2. No bats were identified to emerge from the building during the survey.

4.3.3. Bat activity was identified in close proximity to the building, predominantly to the east with common pipistrelle (*Pipistrellus pipistrellus*) and myotis species bats (*Myotis sp.*) identified foraging over the vegetation and around the trees to the north. Occasional brief soprano pipistrelle (*Pipistrellus pygmaeus*) passes were also recorded and several noctule (*Nyctalus noctula*) were identified passing high over the site from north to south.

4.4. Interpretation

4.4.1. A copy of the desktop data search results for the site, which were included in the Arbtech 2020 PRA, were not available at the time of this survey although no mention of existing records of bats in the building was present in the subsequent Arbtech Bat Emergence Report. Therefore, it is assumed that no existing records of bats were identified in the building during the surveys.

4.4.2. During the PRA the building was assessed to provide a moderate potential to support roosting bats due to minor voids in the walls, missing cement in the verge and gaps around the roof.

4.4.3. The building was also confirmed to support two bat roosts due to bats droppings identified in two areas of the loft space. The droppings were all relatively fresh, indicating recent activity, and implied that bats roost in the void between the roof tiles and lining felt with no scattered droppings that would indicate that bats light sample or forage in the roof void.

4.4.4. During the bat activity survey no bats were identified to emerge from roosts in the building although bat activity from several species, common pipistrelle, myotis species and soprano pipistrelle, was identified in close proximity to the building.

4.4.5. The proposed works include modifications to the existing extension to the rear of the building but do not include changes to the roof. Therefore, if the existing roof and internal ceilings can be maintained throughout the development the impact on roosting bats is likely to be minimal, with a Reasonable Avoidance Method Statement (RAMS) further reducing the likely impacts.

4.4.6. The land surrounding the building was assessed to provide a moderate value foraging and commuting habitat for bats due to the presence of areas of vegetation to the east and the connectivity this provides into the wider surrounding area.

4.4.7. During the bat activity survey foraging and commuting activity was identified in close proximity to the building, notably to the east where there are areas of vegetation, although no significant commuting routes were identified and the level of foraging activity was generally low.

4.4.8. The proposed works will include the clearance of some of the vegetation to the rear of the building to create a garden area although the works will not cause the removal of high value foraging areas or flight lines. Therefore, if a sensitive lighting scheme is implemented during all stages of the works the impact on foraging and commuting bats will be negligible.

5. Recommendations

5.1. Due to the potential in the building being predominantly in the roof it is recommended that the works are carried out in a way that will retain the existing roof and maintain the roof void in an unaltered manner. If works can be carried out in this manner it is recommended that the works commence without the requirement for a Natural Resources Wales (NRW) licence, although it is recommended that the works are carried out under a strict RAMS, outlining measures to ensure that the roosts present in the building undisturbed.

5.2. If it is not possible to carry out the works in a manner that will retain the existing roof and roof void it is recommended that no works commence on the building until NRW licence has been obtained to cover the works.

5.2.1. To support the NRW licence application it is recommended that further bats surveys are carried out to identify the species of bat present and to classify the roosts, in line with the Bat Conservation Trust (BCT) Good Practice Guidelines (2016).

5.2.2. BCT will typically require three surveys during the peak surveys season, which is May to August, to classify a roost, although one of the surveys can extend into September.

5.2.3. It is also recommended that bat droppings collected during the PRA are sent for eDNA analysis, to accurately confirm the species of bats present.

5.2.4. Upon completion of the additional surveys it is recommended that a NRW licence application is prepared, outlining the methodology and mitigation that will be put in place during the development.

5.2.5. Upon receipt of the NRW licence works on the building can commence, in line with the methodology outlined in the licence.

5.3. It is recommended that a sensitive lighting scheme is implemented during all phases of the development, in line with BCT and Institute of Lighting Professionals (ILP) Guidance (2018).

6. Conclusions

6.1. If the works are carried out in a way that will retain the roosts in an undisturbed manner throughout the development the impact on roosting bats will be negligible.

6.2. If any works that require disturbance of the roosts are preceded by further surveys and carried out under licence from NRW the impact of the development on roosting bats will be minimal.

6.3. If a sensitive lighting scheme is implemented during the development the impact on foraging and commuting bats will be negligible.

7. References

BTHK (2018). Bat Roosts in Trees – A Guide to Identification and Assessment for Tree-Care and Ecology Professionals. Exeter: Pelagic Publishing.

BRHK (2021). Bat Roosts in Rock – A Guide to Identification and Assessment for Climbers, Cavers & Ecology Professionals. Pelagic Publishing, Exeter.

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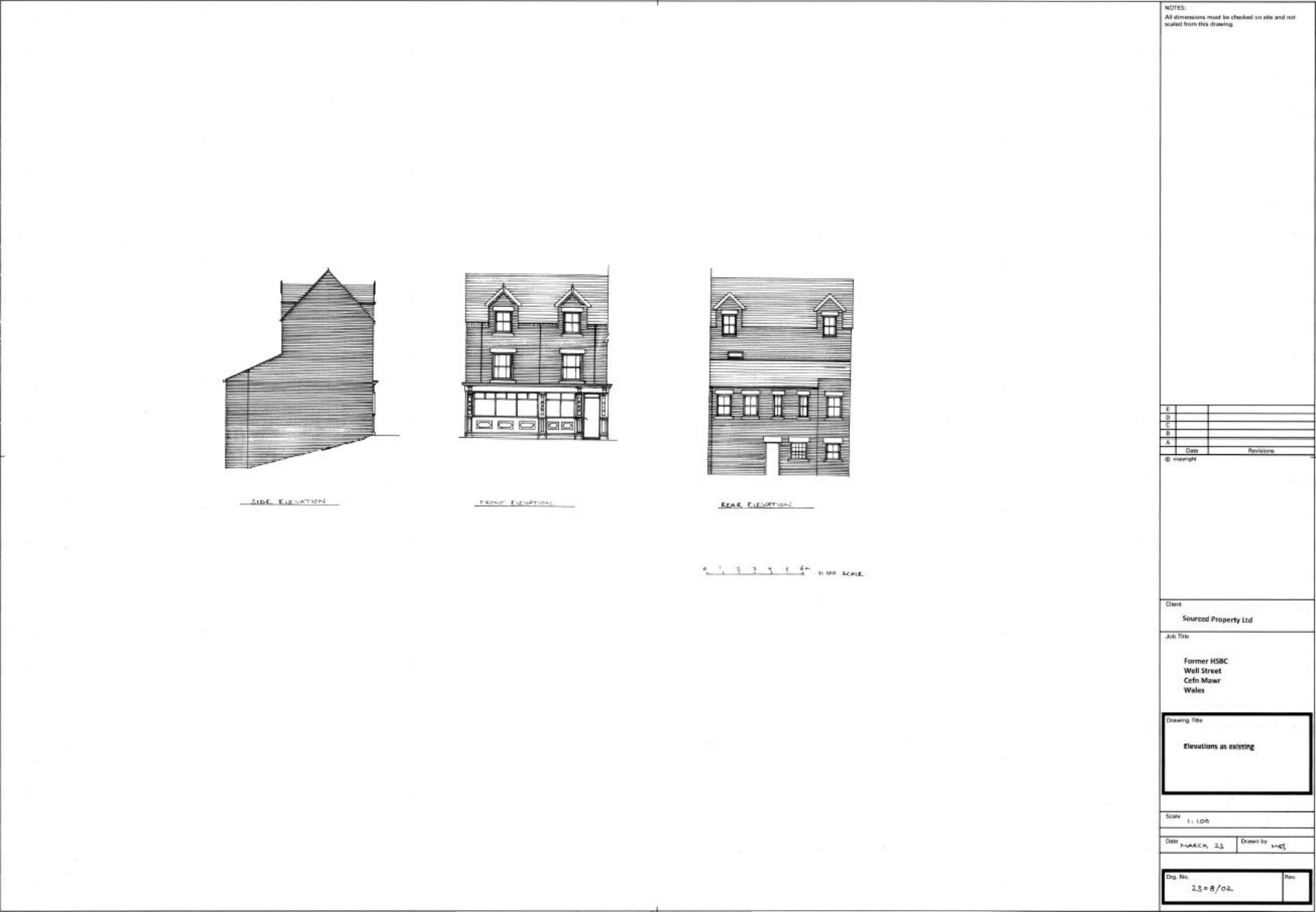
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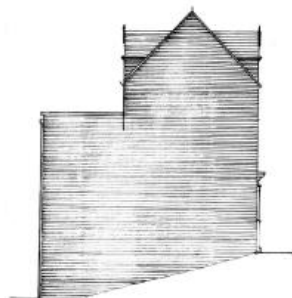
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SIDE ELEVATION



FRONT ELEVATION



REAR ELEVATION

0 1 2 3 4 5 6 M 1:100 SCALE

NOTES:
All dimensions must be checked on site and not scaled from this drawing.

E		
D		
C		
B		
A		
	Date	Revisions

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Client

Sourced Property Ltd

Job Title

Former HSBC
Wells Street
Cefn Mawr
Wales

Drawing Title

Elevations as proposed

Scale 1:100

Date MARCH 23

Drawn by ANG

Dep. No.

22308/04

Rev.

004 x 00000 A3

Appendix II: Survey Results

Site - Former HSBC Bank, Cefn Mawr
Date - 23rd August 2023



Building location

Surveyors

▶ S1

▶ S2

Cameras

▶ C1

▶ C2

★ Field sign location (internal)

↔ Bat activity



Appendix III: Planning Policy and Species Legislation Summary

1. Planning Policy

1.1. The National Planning Policy Framework (NPPF) sets out the governments planning policies and how they should be applied. Section 15 of the policies refers to 'Conserving and enhancement the natural environment'. This outlines how local authorities should deal with biodiversity when considering planning applications.

1.2. NPPF paragraph 180 States:

When determining planning applications, local planning authorities should apply the following principles:

- a) If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- d) Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.*

2. Legislation Summary

Species	Legislation	Offences include
Bats	Conservation of Habitats and Species Regulations 2017 (as amended)	○ Deliberately kill, injure or capture a bat; ○ Deliberately disturb bats; ○ Damage or destroy a breeding site or resting place of a bat.
	Wildlife and Countryside Act 1981	○ Obstruct access to any structure or place which any bat uses for shelter or protection; or ○ Disturb any bat while occupying a structure or place which it uses for that purpose.
Birds	Wildlife and Countryside Act 1981	○ Intentionally kill, injure, or take any wild bird; ○ Intentionally take, damage or destroy a nest of any such bird whilst it is in use or being built; or ○ Intentionally take or destroy an egg of any such bird.

Local authorities therefore have a duty to consider protected species as a material consideration when assessing planning applications. The ODPM Government Circular 06/2005 states: *'It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.'*