

**Acton Park Community Primary School,
Acton, Wrexham**

Bat – Potential Roost Assessment

October 6th 2023

Produced by



www.wildbanksconservation.com

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1.0 INTRODUCTION

- 1.1 The following report has been prepared by Wildbanks Conservation on behalf of Wrexham County Borough Council. It provides details of a bat Potential Roost Assessment of a disused classroom at Acton Park Community Primary School, Acton, Wrexham. The property is to be demolished. The property is located at central OS grid reference SJ 34069 52071.
- 1.2 This report has been produced to inform the council of any restrictions in relation to presence of protected species with regard to the re-roofing works. The aims of the study were to:
- Identify any bat roosts within the classroom that may be impacted by the proposed works
 - Provide recommendations for any necessary further survey work or licencing, as required
 - Provide information on any mitigation and enhancement measures that should be employed during and works

2.0 SURVEY METHODOLOGY

Desktop Survey

- 2.1 Inspection, using colour 1:25,000 OS base maps (www.ordnancesurvey.co.uk), aerial photographs from Google Earth (www.maps.google.co.uk) and Magic.gov (<https://magic.defra.gov.uk/MagicMap.aspx>) was undertaken in order to provide additional context and identify any features of potential importance for nature conservation in the wider countryside.

Bat Surveys

Building Survey

- 2.2 The classroom was subject to an external and internal visual assessment in daylight for evidence of roosting bats and/or features that had the potential to be used by bats on 29/9/23. The survey was carried out by Mick Smith MCIEEM (NRW Bat license No. S089440/2).
- 2.3 Evidence of bat usage included; droppings, urine staining, feeding remains and the discovery of individual bats. Potential roosting/access points were also recorded. The presence of cobwebs and/or general detritus within and around potential access points was used as an indicator that bats had not recently used the area to access the

building. Binoculars and high powered torch were used to assess the holes and gaps within the external roof structure and all possible areas were searched for evidence.

- 2.4 Where possible and safe to do so any holes with potential to be used by bats was visually inspected using an Autel digital inspection videoscope.
- 2.5 The residential building was then classified as offering negligible, low, moderate or high bat roost potential dependant on the features and/or evidence observed following guidelines set out in the BCT Good Practice Guidelines¹ (¹Bat Conservation Trust, Bat Surveys (2012) Good Practice Guidelines 2nd Edition).

Table 1. Bat building survey classification

Category (Potential value)	Description
No/negligible value	Buildings with no or very few features capable of supporting roosting bats. Often buildings are of 'sound' well-sealed structure, or have a single skin and no roof void. They tend to have high interior light-levels, and little or no insulation. Buildings without any roofs may also fall into this category.
Low Value	Buildings of largely unsuitable construction, but with few features of potential value to bats (e.g. gaps above windows, no supporting evidence found). Buildings may be surrounded by poor foraging habitat.
Moderate Value	Buildings usually of brick or stone construction with a number of features of obvious potential value to roosting bats e.g. loose roof / ridge tiles, gaps in brickwork, gaps under fascia boards, and/or warm sealed roof-spaces with under-felt.
High Value	Buildings with a large number of features of obvious potential value to bats (as above). Bats may be suspected to roost within the building (at least at certain times of year), but no supporting evidence found
Confirmed Roost	Bats discovered roosting within the building, or recorded emerging from / entering the building at dusk and/or dawn. Building found to contain conclusive evidence of occupation by bats, such as bat droppings. A confirmed record (as supplied by an established source such as the local bat group) would also apply to this category.

Constraints

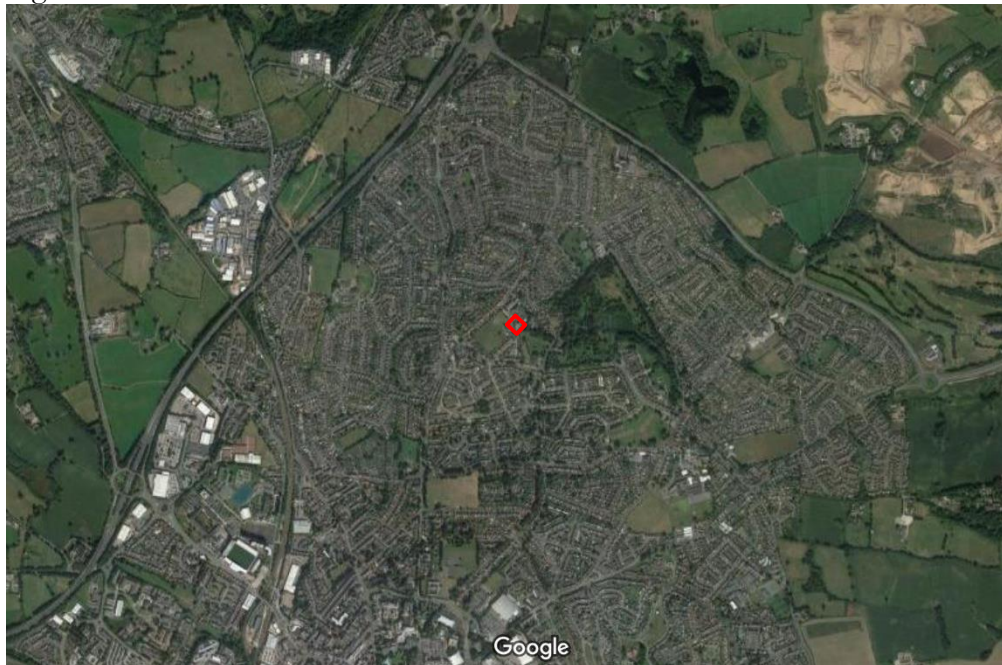
- 2.6 Any ecological survey must be considered as a 'snapshot' of the species at the time of survey, with small/occasional roosting sites having the potential to be missed.
- 2.7 However, no limitations were present during the survey and the results of this Report are considered a true reflection of how bats are using the classroom

3.0 SURVEY RESULTS

Desktop Study

- 3.1 The property is located within the residential setting of Acton, Wrexham. The wider landscape of Wrexham Town is urban. No statutory or non-statutory designations are located within 1km of the Site.

Figure 1: Site location



Building Survey - Bats

- 3.2.1 The external visual assessment of the property was conducted on 29th September 2023 and carried out by Mick Smith MCIEEM (NRW Bat license No. S089440/2). The conditions during the survey were dry and sunny with minimal wind and no rain.

- 3.2.2 The building is a disused, timber chalet classroom, with wood cladding and roofing felt on a shallow pitched roof (plates 1-5). The external gardens of the classroom were laid to lawn with some shrubs and flower beds.
- 3.2.3 The building is generally well sealed to bats. The roof structure is made up of solid plywood timber sheets upon open timber rafters (plate 8). The roofing felt is glued to the plywood with no visible gaps, cracks or areas that are lifted (plate 1). No PRFs are present within the walls or surrounding windows or doors (plate 3).
- 3.2.4 The soffit timber is not present along the entire front and back elevations and gaps between each rafter is open. These gaps are 75mm x 400mm and provide a large amount of direct flight access to the loft space (plate 4-5).
- 3.2.5 The loft space spans the full footprint of the building, (plate 7-8). The loft space has a height of approximately 750mm. Internal access for survey work throughout the loft space was not possible due to the roof construction. Access through a loft hatch allowed a survey of the immediate area surrounding it and to ascertain the thermal and light conditions present within the loft. Light levels within the loft are significant due to the open gaps between each rafter. In addition a notable draught was present within the loft at the time of the survey.
- 3.2.6 Potential Roost Features within the loft were not present. The ceiling of the loft was the underside of plywood boards, this was then nailed to modern timber rafters, no gaps or crevices within the wooden framework exist. Roosting points were limited to the open outside of timbers.
- 3.2.7 The building at Acton Park Community Primary School has no evidence of roosting bats or features to support them..

4.0 DISCUSSION AND RECOMMENDATIONS

- 4.1 This Site has been subject to a bat Potential Roost Assessment on 29th September 2023. No bats or evidence of bats were recorded roosting within the building. The building offers very limited features that could be used by roosting bats. The only PRF's present are the gaps between the rafters providing direct flight access to a low loft space, however, the very low height of the loft and cluttered nature of a loft construction is unsuitable for species that prefer open space for free-flying within a

roost, such as Brown Long Eared bats (*Plecotus auritus*). The ample direct flight access to the loft space also makes the loft very light and draughty making this area less suitable for roosting bats as the thermal regime will not be stable and prone to large fluctuations in temperature, which is less favourable to bats. In addition no cracks, holes or spaces within the roof structure where crevice-dwelling bats could potentially roost were found. It is considered unlikely that crevice dwelling species would roost on the side of the timbers in the open loft space. No evidence of bat usage was seen within the area of the loft accessible for survey.

4.2 The building is considered to have low to negligible opportunities for small numbers or individual bats during the summer, negligible potential for higher status roosts and no potential for hibernation roosts in accordance with BCT Guidelines 2016.

4.3 It is considered that no further survey work is required to further inform these conclusions and the recommendations below.

Recommendations

4.4 Due to the transitory nature of bats and their use of multiple roosts throughout the year, there is the potential that individual bats could be found almost anywhere. The proposed demolition without mitigation or consideration to bats has a small chance to potentially disturb, modify or destroy potential bat roosts and potentially kill or injure individual bats. Without mitigation the risk to individual bats increases but can be reduced to a negligible level with the implementation and strict adherence to a Mitigation Strategy.

4.5 The proposed Mitigation Strategy below (to be agreed) should be adhered to before and during construction works.

4.6 Mitigation Strategy

- Works should commence outside of bat's peak activity season (May – September). Bats are less likely to be present between November and March and works should be timed for this period
- A suitable qualified ecologist will be appointed to oversee the works.
- Prior to the commencement of works a toolbox talk will be provided to contractors and onsite personal by a NRW licensed ecologist. The talk will include information regarding the protection of species, habitats, legal implications, their responsibilities and what to do if bats are encountered.

- The initial works will be carried out under “soft works” technique, e.g. removal of roof by hand. A licensed ecologist will provide a watching brief during the initial works and will be available throughout construction on an ‘on call’ basis.
- If bats or birds, or any other animal are found during works, works must stop immediately, and the site ecologist will be contacted, and advice sought: Wildbanks Conservation; 01691 623505.

Compensatory habitat

- 4.7 It is recommended that a total of four Vincent Wildlife Trust bat boxes are installed on two trees along Box Lane (two per tree), or other suitable trees within the school grounds, to improve the long-term opportunities for roosting bats on site. This will ensure the conservation status of bats within the area is maintained and enhanced. Exact location to be agreed between Wrexham Council and appointed ecologist.



Vincent Pro bat box

5.0 REFERENECES

- 1 CIEEM (2013). Guidelines for Preliminary Ecological Appraisal. Winchester.
CIEEM.
- 2 Collins, J (ed.). 2016. Bat Surveys for Professional Ecologists: Good Practice
Guidelines (3rd edn). The Bat Conservation Trust. London.
- 3 Mitchell-Jones, A.J. 2004. Bat Mitigation Guidelines. English Nature, Peterborough
- 4 Natural England (2010). European Protected Species and the Planning Process.
- 5 Planning Policy Wales Edition 10.

A1 APPENDIX – SITE PHOTOGRAPHS. Plates 1 – 8



Plate 1: The south-eastern aspect of the building showing roofing felt and wood cladding structure with external garden.



Plate 2: The well-sealed gable ends of the building. No PRF's present.



Plate 3: Areas around window and ends of timber sarking well sealed



Plate 4: The gaps between the open rafters allowing direct flight access into the loft space across the front of the building.



Plate 5: The gaps between the open rafters allowing direct flight access into the loft space across the front of the building



Plate 6: Internal of the classroom



Plate 6: loft space, 750mm height 'clean' timber framing



Plate 8: view from the loft looking out of the gaps between the rafters. Note significant light spillage into loft

A2 APPENDIX – RELEVANT LEGISLATION & PLANNING POLICY IN RELATION TO BAT SPECIES

Relevant Legislation

A2.1 Due to recent declines in bat species' populations within the United Kingdom, all bat species and their roost sites in Britain are protected under the Wildlife and Countryside Act 1981 (as amended). They are also included on Annex IV of Council Directive 92/43/EEC of 21st May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the Habitats Directive). As a result of the United Kingdom ratifying this directive, all British bats are protected under The Conservation of Habitats and Species Regulations 2010. Under this legislation it is an offence to intentionally kill, injure or capture or intentionally (or recklessly in England and Wales) disturb bats or obstruct access to, damage or destroy bat roosts.

A2.2 Under the law, a bat roost is any structure or place used for shelter or protection e.g. a building, bridge or tree. Bats use many roost sites and feeding areas throughout the year and since they tend to re-use the same roosts for generations these sites are protected whether bats are present or not.

A2.3 Any activity resulting in a contravention of the legislation described above would require a Natural Resources Wales licence to avoid committing an offence. Natural Resources Wales issue licences for the purposes of:

“preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial”.

A2.4 The National Planning Policy Framework sets out how the planning system should contribute to and enhance nature conservation and the local environment. This is to be achieved through a combination of local planning policies as well as through the determination of planning applications with the aim of minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

A2.5 As such it is essential that the presence or otherwise of protected species, and the extent to which they are affected by proposals is established prior to planning permission being granted. Furthermore, where protected species are present and

proposals may result in harm to the species or its habitat, steps should be taken to ensure the long-term protection of the species, such as through attaching appropriate planning conditions for example.

A2.5 In addition to legislation, there are national and local planning policies pertaining to the protection of biodiversity. Planning Policy Wales Edition 10 makes provision for Biodiversity and Ecological Networks, supported by The Environment (Wales) Act 2016 which introduced an enhanced biodiversity and resilience of ecosystems duty on Local Authorities to consider the need to:

- support the conservation of biodiversity, in particular the conservation of wildlife and habitats;
- ensure action in Wales contributes to meeting international responsibilities and obligations for biodiversity and habitats;
- ensure statutorily and non-statutorily designated sites are properly protected and managed;
- safeguard protected and priority species and existing biodiversity assets from impacts which directly affect their nature conservation interests and compromise the resilience of ecological networks and the components which underpin them, such as water and soil, including peat; and
- secure enhancement of and improvements to ecosystem resilience by improving diversity, condition, extent and connectivity of ecological networks.