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BAT METHOD STATEMENT

At

Bridgeway Centre

Bridge Road
Wrexham
LL13 9QS

NGR: SJ 37793 49421

Prepared for:	FI Facilities Management Ltd
Written by:	Tom Kenwright, UES Senior Ecologist
Approved by:	Toby Hart, UES Managing Director

A handwritten signature in black ink, appearing to read 'Toby Hart', is positioned below the 'Approved by:' line.

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1 INTRODUCTION

1.1 Author and qualifications

This report is written and compiled by Tom Kenwright BSc MSc ACIEEM, Senior Ecologist for United Environmental Services Ltd (UES). Tom is listed as an accredited agent under the Natural Resources Wales bat survey licence of Toby Hart, see below.

The report has been verified by Toby Hart BSc MCIEEM PIEMA, UES Managing Director. Toby is licensed by Natural Resources Wales to disturb, take and handle all species other than greater horseshoe *Rhinolophus ferrumequinum* or lesser horseshoe *Rhinolophus hipposideros* under licence number S086508/01.

1.2 Proposed development and previous survey information

The proposed development includes the demolition of two buildings at the Bridgeway Centre, Wrexham (Buildings 3 and 4, see Appendix 1).

A bat scoping survey undertaken by UES on the 24th June 2020 assessed Building 3 as having negligible potential to support roosting bats and Building 4 as having low potential to support roosting bats. No evidence of roosting bats such as droppings were observed during the inspections of either buildings. As such, it was recommended that works to Building 3 could commence without further mitigation, compensation or surveys, with regards to roosting bats. It was recommended that a single further bat presence / absence survey was undertaken of Building 4.

No bats were found to be roosting during the subsequent bat presence / absence survey of Building 4, undertaken by UES on the 22nd September 2020. As such, it was recommended that works could proceed without further mitigation, compensation or surveys, with regards to roosting bats.

Delays in the planning process have since resulted in the initial bat presence / absence surveys being over 2 years old and considered to be outdated. As such, an updated bat scoping survey of both buildings was undertaken by UES on the 17th February 2023. The purpose of the survey was to provide an update on the condition of the buildings and to inform the need for mitigation measures. During the updated survey, both buildings were found to be in the same condition as in 2020. Building 3 is still considered to have negligible potential to support roosting bats, whilst Building 4 was assessed having low potential to support roosting bats due to a small number of low-quality potential roosting features (PRFs), all of which can be fully inspected using an endoscope and a high-powered torch.

It is considered unlikely that bats are using Building 4 to roost, however, there remains a low residual risk of bat presence during the works. As such, it was recommended that the works to this building proceed under a non-licensed method statement, an approach that has been agreed in principle with Wrexham County Borough Council's Ecology Officer.

1.3 Report objectives and structure

This document sets out all the necessary procedures, timings and mitigation measures to avoid impacts on bats during works on site and avoid any potential breaches of protected species legislation. This report should be read in conjunction with appendices 1 – 4.



2 IMPACT ASSESSMENT

2.1 Impacts without mitigation

The applicant plans to demolish Buildings 3 and 4 at the Bridgeway Centre Wrexham.

Building 3 has been assessed as having negligible potential to support roosting bats due to a lack of PRFs. As such, there are no potential impacts to roosting bats as a result of works to this building. This building isn't discussed further within this document.

The bat scoping and bat presence / absence surveys in 2020 and the updated bat scoping survey in 2023, which included a detailed inspection of all PRFs, found no evidence of roosting bats within Building 4. As such, a European protected species (EPS) mitigation licence will not be required for the works to proceed.

It is considered unlikely that bats are using the building to roost, however given the presence of a small number of low-quality PRFs, all of which can be fully inspected using an endoscope and a high-powered torch, there remains a low residual risk of bat presence during the works.

Without mitigation, the development could have the following impacts on bats in the unlikely event that they are present during the works:

- Killing or direct harm
- Disturbance by noise, lighting and vibration
- Loss of a bat roost

As such, it was recommended that the works to this building proceed under a non-licensed method statement. Prior to the commencement of any works the building, this document will need to be reviewed and approved by the Local Planning Authority as part of the planning application.

3 MITIGATION MEASURES

The following measures are designed with the primary objective of safeguarding bats in the unlikely event that they are present during the works. They will ensure that the construction personnel have a high level of understanding about bats and the legislation which protects them, and provide them with the necessary guidance and mechanisms should any bats be discovered during the development process. See Appendix 2 for a summary.

3.1 Timings

The lack of known bat roosts or evidence of bat roosts within the building, the presence of only low quality PRFs that aren't suitable to support a maternity colony of bats, as well as the proposed pre-commencement inspection (see section 3.3), negate the need for timing restrictions in relation to this development.

3.2 Toolbox talk

The project ecologist will deliver a toolbox talk to the contractors responsible for the destructive works, prior to commencement. The talk will cover bat ecology, bats and the law, and what to do if bats or field signs of bats are found during the works.

3.3 Prior inspection of roost areas

Prior to the start of works, all PRFs will be inspected by a licensed bat ecologist. All PRFs within the building are shallow and can be fully inspected from ground level or from a ladder. The licensed ecologist will use a high-powered torch and an endoscope where necessary to fully examine all PRFs, in order to further confirm the presence or absence of bats and direct works accordingly.

3.4 Emergence / Re-entry survey

All PRFs within the building are shallow and can be fully inspected from ground level or from ladders using a high-powered torch or an endoscope. As such, there is no need to undertake a pre-commencement emergence or re-entry survey.

3.5 Soft demolition techniques

As all PRFs within the building are shallow and can be fully inspected, there is no need to undertake soft demolition of the building.

However, if deemed necessary by the licenced ecologist, PRFs or other sensitive areas of the building may need to be removed by hand under the direct supervision of a licensed ecologist.

3.6 Roosting bats

In the unlikely event that any roosting bats are found to be using the building, all works will cease, and the mitigation strategy will be reviewed; this will likely include the acquisition of an



EPS licence from Natural Resources Wales. The bat and bat roost will be retained in situ until further measures have been confirmed.

3.7 Ongoing advice

UES will remain on call throughout the development in case any further advice is needed or bats are encountered.

UES can be contacted directly on 01565 757788.



4 COMPENSATION MEASURES

No bat roosts are known to be present within Building 4. As such, no specific compensation needs to be provided. Despite this, the building contains a small number of low-quality PRFs. As such, a bat box will be provided to compensate for the loss of these features and to provide an ecological enhancement.

4.1 Bat boxes

A Schwegler 2F or Schwegler 1FF bat box will be fitted to suitably mature tree within the site boundary. The bat box will be left in situ for the duration of the operational phase of the development.

Alternative makes and models of bat boxes can be used if the aforementioned types aren't available. If an alternative bat box is to be used, it should first be approved by the project ecologist, to ensure it provides to appropriate roosting opportunities. Woodcrete style boxes should be prioritised over wooden boxes due to their longevity.

The bat box should be located on a southerly aspect, where it will receive the maximum amount of sunlight. It should be sited at a height of at least 4 metres, with a clutter-free drop-zone beneath. It should also be positioned away from any potential disturbance, as specified by the onsite ecologist. Once bats have inhabited a bat box they may only be disturbed by a licensed bat ecologist.

4.2 External lighting

When planning external lighting, consideration is to be given to the commuting and dispersal routes used by bats. External lighting is to be directed away from any tree lines on site and away from the installed bat box.

See Appendix 3 – External lighting guidance for further information.



5 POST-DEVELOPMENT

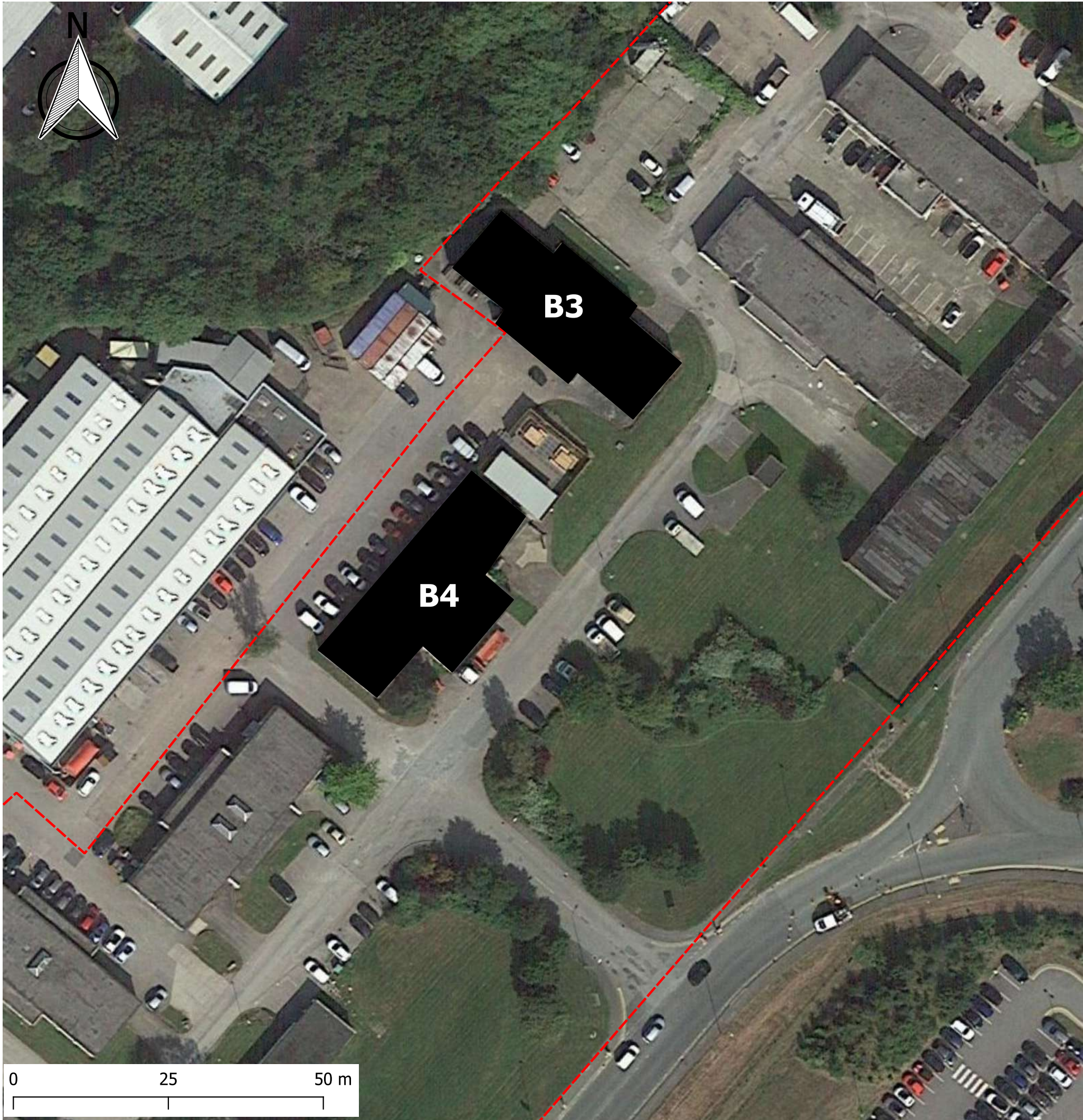
There will be no loss or impacts to known bat roosts as a result of the proposed development. There will be no fragmentation, isolation or long-term impacts on bats locally as a result of the proposed development. Under the current scheme, no linear features will be lost or altered and habitat linkages will remain unchanged.

No future monitoring of the proposed bat box is required, although UES reserve the right to do this on an *ad-hoc* and voluntary basis.



APPENDICES

Appendix 1 – Site plan



Bat Scoping Survey

Site: Bridgeway Centre,
Wrexham
NGR: SJ 37793 49421
Author: Ysobella Cox
Date: 23/02/2023



Key

- Buildings
- Survey boundary

Map data © 2023 Google, Imagery © 2023 Google

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Appendix 2 – Impact avoidance measures

Habitat feature	Potential / likely impact	Control / mitigation measures for contractor	Risk	Scale of potential impact without mitigation			Scale of impact with mitigation			
				Low	Medium	High	Negligible	Low	Medium	High
Building 4	Disturbance, direct harm to bats during works	All contractors involved in the construction works made aware of the possibility of bats being present and their responsibilities via a toolbox talk	Ensure contractors behave responsibly	X			X			
		Pre-commencement inspection of all potential roosting features using	Ensure bats are not directly harmed	X			X			
		Suitably qualified ecologist on site to oversee soft demolition of potential roosting features	Ensure that in the unlikely event of bats being found they are not injured	X			X			
	Long term loss of bat roosting features	Bat roosting opportunities provided through the instalation of a bat box, affixed to trees on site.	Ensure bats have sufficient roosting opportunities available locally	X			X			
Site in general	Disturbance to bats caused by external lighting	Advice given to the planning team about any proposed external lighting.	To ensure flight paths and proposed bat box are not affected by external lighting		X			X		



Appendix 3 – External lighting guidance

Lighting scheme in relation to bats

The two most important features of street and security lighting with respect to bats are:

1. The UV component. Low or zero UV installations are preferred to reduce attraction of insects to lighting and therefore to reduce the attraction of foraging bats to these areas.
2. Restriction of the area illuminated. Lighting must be shielded to maintain dark areas, particularly above lighting installations, and in many cases, land adjacent to the areas illuminated. The aim is to maintain dark commuting corridors for foraging and commuting bats. Bats avoid well lit areas, and these create barriers for flying bats between roosting and feeding areas.

UV characteristics:

Low

- Low pressure Sodium Lamps (SOX) emit a minimal UV component.
- High pressure Sodium Lamps (SON) emit a small UV component.
- White SON, though low in UV, emit more than regular SON.

High

- Metal Halide lamps emit more UV than SON lamps, but less than Mercury lamps
- Mercury lamps (MBF) emit a high UV component.
- Tungsten Halogen, if unfiltered, emit a high UV component
- Compact Fluorescent (CFL), if unfiltered, emit a high UV component.
- Variable
- Light Emitting Diodes (LEDs) have a range of UV outputs. Variants are available with low or minimal UV output.
- Glass glazing and UV filtering lenses are recommended to reduce UV output.

Street lighting

- Low-pressure sodium or high-pressure sodium must be used instead of mercury or metal halide lamps. LEDs must be specified as low UV. Tungsten halogen and CFL sources must have appropriate UV filtering to reduce UV to low levels.
- Lighting must be directed to where it is needed and light spillage avoided. Hoods must be used on each lamp to direct light and contain spillage. Light leakage into hedgerows and trees must be avoided.
- If possible, the times during which the lighting is on overnight must be limited to provide some dark periods. If the light is fitted with a timer this must be adjusted to reduce the amount of 'lit time' and provide dark periods.

Security and domestic external lighting

The above recommendations concerning UV output and direction apply. In addition:

- Lighting should illuminate only ground floor areas. Light should not leak upwards to illuminate first floor and higher levels.
- Lamps of greater than 2000 lumens (150 W) must not be used.
- Movement or similar sensors must be used. They must be carefully installed and aimed, to reduce the amount of time a light is on each night.
- Light must illuminate only the immediate area required, by using as sharp a downward angle as possible. Light must not be directed at or close to bat roost access points or flight paths from the roost. A shield or hood can be used to control or restrict the area to be lit.
- Wide angle illumination must be avoided as this will be more disturbing to foraging and commuting bats as well as people and other wildlife.
- Lighting must not illuminate any bat bricks and boxes placed on buildings, trees or other nearby locations.



Appendix 4 – Statutory and planning context

Ecological assessments

Ecological assessments play an important part within the planning context; they include an initial assessment which highlights any specific interests of a site. From the initial site assessment, the surveyor assesses the suitability of habitats within the site to support protected species and makes recommendations for further survey works if required. The following paragraphs provide a brief interpretation of the legislative protection that is relevant to the findings of this report.

Bats

In the United Kingdom, all species of bat and their roosts are afforded full protection under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (known as the “Habitats Regulations”). The Wildlife and Countryside Act is the domestic implementation of the Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention) and was amended by the Countryside and Rights of Way Act 2000. This makes it an offence to:

- Deliberately, intentionally or recklessly kill, injure or capture a bat
- Deliberately, intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection
- Deliberately, intentionally or recklessly damage, destroy or obstruct access to any place that a bat uses for shelter or protection (even if the bat is not present at the time)
- Keep, transport, sell or exchange, or offer for sale or exchange any live or dead bat, any part of a bat or anything derived from a bat

Under UK law, a bat roost is *any structure or place which any wild [bat] ... uses for shelter or protection*. As bats often reuse the same roosts, legal opinion is that a roost is protected whether or not the bats are present at the time of the activity taking place.

Penalties for offences include fines of up to £5000, plus up to six months imprisonment, for each offence committed.

If an activity is likely to result in any of the above offences, a licence can be applied for to derogate from the protection afforded. These licences must provide appropriate mitigation and are issued by National Resources Wales (NRW).

The Natural Environment and Rural Communities (NERC) Act 2006 lists the following bat species as species of principle importance under Section 41:

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

Section 40 requires every public body in the exercising of its functions ‘have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity’ (all biodiversity and not just section 41 species and habitats); therefore making these bats a material consideration in the planning process and requiring a detailed ecological bat survey before planning permission can be granted.

Planning Policy

National planning guidance is issued in the form of Planning Policy Wales (PPW - 2018). The most relevant sections are included in Chapter 6: Distinctive and Natural Places. This chapter details the policies on issues such as the protection of trees, woodlands, species, and designated sites. The document is free and available to view online.