



RAFA CLUB, WREXHAM

PRELIMINARY ROOST ASSESSMENT & REASONABLE AVOIDANCE METHOD STATEMENT

DATE	ECOLOGIST	APPROVED	VERSION	COMMENTS
27/01/2022	Lucy Boyett	Keymar Wake	1	

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Executive Summary

Site	RAFA Club, Cadet Centre, Ruthin Road, Wrexham LL13 7NU Grid Reference: SJ 32644 49987
Surveyors	Preliminary Roost Assessment (PRA) undertaken by Lucy Boyett (accredited agent on NRW bat licence S090407/1)
Proposed work	Full demolition of two single storey RAFA Club buildings.
Type of survey	Preliminary Roost Assessment of both buildings proposed for demolition; undertaken on 13 th January 2022.
Main results of survey	• No bats or signs of bats were identified • Buildings in very good condition with limited potential roosting features present
Survey conclusions	• Surrounding area is moderately suitable for bats • Buildings had negligible - very low potential for bats • No further surveys recommended • Reasonable Avoidance Method Statement (Section 7) to be followed during demolition works.

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1.0 Introduction

- 1.1 Enfys Ecology Limited were commissioned by Rowley Szilagy LLP on behalf of the Reserve Forces & Cadets Association for Wales, to carry out a Preliminary Roost Assessment (PRA) of the RAFA Club, Wrexham and produce a Reasonable Avoidance Measures Method Statement for the proposed demolition works.
- 1.2 The proposed works are for the full demolition of the two single storey adjacent buildings and for the grounds to be reinstated to grassland.
- 1.3 The survey was commissioned to determine whether the proposed works would affect protected species, specifically bats and nesting birds. The survey work to inform this report was carried on 13th January 2022. This report is valid for a period of eighteen months from this date (January 2022) in accordance with best practice.
- 1.4 All British bats (and roost sites) are protected under the Wildlife and Countryside Act (WCA) 1981 (as amended). In addition, all bats are classified as European Protected species by The Conservation of Habitats and Species Regulations 2010 (as amended). Under this legislation, it is an offence to kill, injure or disturb a bat, or to destroy any place used as a shelter by bats.
- 1.5 All birds (and their nests) are legally protected under the wildlife and countryside act 1981 and it is an offence to intentionally take, damage or destroy the nest of any wild bird while it is in use or being built (as well as kill or injure wild birds of their eggs).

2.0 Site Description

2.1 Survey area

- 2.1.1 The site comprised two single storey adjacent buildings, stood on hardstanding, surrounded by a narrow strip of amenity grassland and fencing. The buildings were situated on the outskirts of Wrexham, within the north eastern corner of a large playing field; with hardstanding and urban areas to the north, and a mainline railway running along the eastern boundary of the site. The railway was lined with mature trees, linking the site to areas of woodland and high-quality habitat to the south.



FIGURE 2.1. THE SITE AND SURVEYED BUILDINGS (RED). BASE IMAGE ©GOOGLE 2022



FIGURE 2.2. THE WIDER LANDSCAPE - THE SURVEY SITE IS SHOWN IN RED. BASE IMAGE © GOOGLE 2022

2.2 *Designated Sites*

- 2.2.1 There are no statutory designated sites and one non-statutory wildlife site within a 1km radius of the site. Erddig Estate wildlife site is located 500m to the south.
- 2.2.2 A data search from Cofnod (Local Environmental Records Centre) returned a number of bat records within a 2km radius of the site. The closest records included common and soprano pipistrelle, *Myotis* sp and noctule, 458m to the south (2016).

3.0 Methodology

3.1 *Preliminary Roost Assessment*

- 3.1.1 The buildings were assessed for any signs of bats; these include droppings, feeding remains, and other indicative marks, plus features of potential use to bats such as crevices, cracks and other holes, and any potential access points into the buildings. High powered torches were used to inspect any identified features, and an endoscope was used to investigate any gaps or crevices, where appropriate.

3.2 *Survey Details*

3.2.1 The external and internal building inspections were carried out on the 13th January 2022 by Lucy Boyett (accredited agent on bat Licence No. S087351/1). Potential roost assessments were carried out following the guidelines set by the Bat Conservation Trust, 'Bat Surveys – Good Practice Guidelines' (Collins, J. 2016). Photographic evidence was taken where necessary.

3.3 *Limitations*

3.3.1 The roof voids were approx. 50cm in height and so it was not possible to inspect the space beyond the loft hatch (located at the centre of the roof void). One of the two loft spaces was also locked and so was not inspected.

4.0 Building Descriptions

4.1 The two buildings were identical and ran parallel to each other. They were both clad with wooden panelling, had plastic fascias, soffits and bargeboards and a single skin corrugated metal pitched roof. To the front of the buildings, was a canopy comprising wooden boarding, with a metal frame. The details of the buildings are described in Table 4.1.

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TABLE 4.1 BUILDING DESCRIPTION

Description	Photo
External	
• Two single storey buildings with corrugated metal pitched roofs • Plastic roofline • Clad with wooden panelling • Canopy comprised two layers of wooden boarding, with a gap of approx. 10cm between, split into sections by the internal wooden framework.	 <i>EASTERN AND WESTERN ELEVATIONS</i>  <i>WOODEN CANOPY TO THE NORTH OF THE BUILDINGS</i>

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Description	Photo
Internal (western most building)	
• Single skin, corrugated metal roof with a wooden frame. • Approx. 50cm to the roof apex • Glass fibre insulation present	 <i>Roof Void</i>

5.0 Preliminary Roost Assessment: Results

- 5.1 No bats or signs of bats were found externally or internally.
- 5.2 The wooden cladding, fascias, soffits and bargeboards were all in very good condition with no potential roosting features identified. The roof space was well sealed and had very limited potential for roosting internally. A few of the wooden panels were missing from the walkway canopy, and one board was coming away at the corner leaving a small potential gap to enter. Details of this feature is provided in Table 5.1.

TABLE 5.1 POTENTIAL ROOSTING FEATURES FOR BATS AND BIRDS

Description	Photo
A piece of the wooden panelling forming the canopy was coming away at the corner, leaving a potential gap to enter the structure.	

- 5.3 No nesting birds, or previous signs of nesting were observed during the survey, and there was limited potential for nesting within and around the buildings.

6.0 Discussion and Evaluation

- 6.1 The proposed works are for the full demolition of the two buildings and for the grounds to be reinstated to grassland.
- 6.2 Although the area immediately surrounding the site was mainly urban, the tree lined railway line along the eastern boundary of the site did provide habitat suitable for bats and it is likely that they will use this area for foraging and commuting.

- 6.3 With only one limited potential roosting feature present, within the wooden canopy, the buildings had negligible/very low potential for roosting bats (Collins, J., 2016); no bats or evidence of bats was identified during the PRA.
- 6.4 As the building was found to have negligible/very low potential for bats, no further survey work is recommended and the works can be carried out at any time of year. The demolition of the buildings will not have a negative impact on any bat populations within the area or the neighbouring foraging areas for the bats.

7.0 Reasonable Avoidance Method Statement

- 7.1 As the buildings were found to have negligible/very low potential for bats, it is highly unlikely that bats use them to roost or hibernate within, and therefore also highly unlikely for bats to be present during the works. However, the tree lined railway would provide suitable habitat for bats and bats can move into a structure or building at any time; to reduce the risk to bats, in the unlikely event that they are present during the works, this Reasonable Avoidance Method Statement, should be followed at all times.
- 7.2 *Demolition Works*
- 7.2.1 All contractors involved in the demolition works, will be made aware of the measures set out within this method statement, through a toolbox talk given during the site induction process, prior to the start of works. A log of all attendees will be kept.
- 7.2.2 The following must be undertaken prior to the full demolition of the buildings;
- The roofline, including fascias, soffits and bargeboards must be removed by hand. This must be done carefully, whilst at the same time checking behind the material for the presence of bats before fully removing it.
 - The corrugated metal roof sheets must be removed by hand. The underside of the sheets should be checked before full removal, paying particular attention to where they meet the top of the wall and areas where they attached to the wooden roof structure.
 - The wooden boarding, forming the canopy along the front of the buildings, must all be removed by hand, and checked for the presence of bats before being fully removed and discarded.
 - **If, in the unlikely event, bats (or evidence of bats) are encountered at any point during any works; all works must immediately stop and a licenced ecologist must be called. Further surveys and a licence will then be required from Natural Resources Wales before works can continue.**

7.3 *Lighting*

7.3.1 The tree lined railway to the east of the site, provides suitable habitat for foraging and commuting bats and any lighting associated with the site during the works has the potential to impact bats and other nocturnal species. To reduce the potential impact of any light spillage during, the works, lighting design for the site should seek to minimise the levels of light along the eastern boundary.

- There must be no lights focused on, or illumination of, the tree line to the east of the site or individual trees during the works.
- Any external or security lighting should be limited to provide some dark periods during the night. Ideally the lighting should be motion activated, and not stay on longer than one minute, in order to provide maximum darkness when not needed, as well as providing safe lighting conditions when required.

7.4 *Birds*

7.4.1 No evidence of nesting birds were seen during the survey, and there was limited potential for nesting within the site. However, the buildings were surveyed outside of the nesting bird season and birds can move into structures at any point during this period; therefore, if works are to be carried out during the breeding season (which is March to September inclusive) then a check must be carried out immediately prior to works starting (no more than 48 hours beforehand) to ensure that no active nests will be affected. If active nests are found then work must be delayed until all chicks have fledged.

7.5 *General Reasonable Avoidance Measures*

7.5.1 Suitable Reasonable Avoidance Measures (RAMS) will be implemented to reduce the potential to impact to bats, nesting birds and other species that may be found on site.

The following measures should be implemented at all times during the works:

- Working areas should be kept to the minimum required.
- Works should be avoided within 1 hour of dawn and dusk where possible to avoid disturbance to nocturnal animals. If works outside this time are needed, all lighting should be directional and be directed away from the eastern site boundary.
- If at any point in the works a reptile or amphibian is found all works in the vicinity of the sighting must immediately cease; if a common species is found it can be picked up (with gloves) and moved to a safe area off the site.

- Any terrestrial mammals, for example badgers, seen must be allowed to leave the area on their own. If this is not possible e.g. the animal is injured or trapped then an ecologist must be called.

8.0 Legislation

8.1 Bats

The Wildlife and Countryside Act (WCA) 1981 (as amended) forms the key legislation protecting habitats and species in the UK. All UK bat species are fully protected under the 1981 Act through inclusion on Schedule 5. All bats are also listed under Schedule 2 of the Conservation of Habitats and Species Regulations (2017) which transcribes the EC Habitats Directive into UK law. In combination, this legislation makes it an offence to:

- Deliberately or recklessly take, injure or kill a bat;
- Deliberately or recklessly damage or destroy a place or structure used by bats for shelter or protection;
- Deliberately or recklessly obstruct access to a bat roost; or
- Deliberately or recklessly disturb bats while occupying a roost.

Bat roosts are protected under these laws whether the animals are present at the time of survey or not. Under both laws the Welsh Government and D.E.F.R.A. are empowered to issue licences to carry out work to bat roosts for reasons of overriding public interest. It is not illegal to tend to a disabled bat pending recovery.

8.2 Birds

In addition, under the Wildlife and Countryside Act, 1981 (as amended) and the Countryside and Rights of Way, 2000, all wild birds, their nests and eggs are protected during the breeding season (typically March to August inclusive). This makes it an offence to:

- Intentionally kill, injury or take any wild bird.
- Take, damage or destroy the nest of a wild bird included in Schedule ZA1.
- Take, damage or destroy the nest of any wild bird while that nest is in use or being built.
- Take or destroy an egg of any wild bird.

9.0 References and Information Sources

Bat Conservation Trust (2018) Bats and artificial lighting in the UK- bats and the built environment series www.bats.org.uk

Collins, J. (ed.) (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines, (3rd Edition). Bat Conservation Trust, London.

Stone, E.L. (2013) Bats and lighting: Overview of current evidence and mitigation guidance