



Lady Margaret's Park CAMC

Bat Conservation Plan

Prepared by
CSA Environmental

on behalf of
The Caravan and Motorhome
Club

Report No: CSA/1992/09

December 2021

This report may contain sensitive ecological information. It is the responsibility of the Local Authority to determine if this should be made publicly available.

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1.0 INTRODUCTION

- 1.1 Planning permission was granted by Wrexham County Borough Council on 06 December 2021 for Lady Margarets Park Caravan and Motorhome Club site. Planning Condition 3 of the Decision Notice relates to the conservation of bat species at the site, as stated below:

3. No development shall commence until a site wide bat Conservation Plan has been submitted to and approved in writing by the Local Planning Authority. The Conservation Plan shall include, but not necessarily be limited to:

- *Build upon the principles outlined in the ecological report (Thomas, C. (2021). Preliminary Ecological Appraisal - Lady Margaret's Park, Chirk, Wrexham. CSA Environmental. Unpublished Report No CSA/1992/05).*
- *Details of bat avoidance, mitigation and compensation measures including plans.*
- *Details of timing, phasing and duration of construction activities and conservation measures.*
- *Timetable for implementation and demonstrating that works are aligned with the proposed phasing of the development.*
- *Actions to be taken in the event that previously unidentified species of bat are found*
- *Persons responsible for implementing the works*
- *Ecological Compliance Audit, including key performance indicators.*
- *Further details concerning any external lighting scheme. This scheme to include plans illustrating features planned to be functionally used by bats for foraging/dispersal purposes.*

The Conservation Plan shall be carried out in accordance with the approved details.

- 1.2 This report has been prepared by CSA Environmental on behalf of The Caravan and Motorhome Club (CAMC) to address the requirements within Condition 3. It sets out site wide ecological avoidance, mitigation, compensation and enhancement measures for bats, to be implemented in association with proposals to demolish and rebuild the toilet block and make alterations to existing pitches, compounds, roads and service points, at the Lady Margarets Park CAMC (hereafter referred to as 'the Site').
- 1.3 The Site comprises of a single storey toilet block, and a combination of all-weather and grass pitches, with associated amenity grassland, road infrastructure and wardens facilities. The Site is surrounded by mature broadleaved woodland and tree groups, with Chirk Castle and Parkland SSSI located to the west of the Site, which is known to support a number of roosting and foraging bat species. The planning application was supported by summer bat survey work, as reported within the Bat Survey

Report (CSA/1992/06a), to inform a Preliminary Ecological Appraisal (CSA/1992/05a) of the proposals.

- 1.4 This report builds upon the principles of the approved PEA and provides further detail on the strategy to minimise harm to bat species through avoidance, mitigation and where necessary compensation for potential impacts to these ecological features, as well as provision of ecological enhancement measures to be delivered alongside the renovation.
- 1.5 Management and monitoring prescriptions have been set out to ensure delivery of the above measures is successful, and identify remedial actions where required. Responsible parties are identified so as to aid enactment.
- 1.6 This document has been prepared with due regard to the 'mitigation hierarchy' set out within the British Standard BS 42020:2013, which involves the following step-wise process:
 - **Avoidance** – avoiding adverse effects through good design;
 - **Mitigation** – where impacts are unavoidable, mitigation should be employed to minimise adverse effects;
 - **Compensation** – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm;
 - **Enhancement** – maximise opportunities to deliver biodiversity benefits, which can be delivered alongside the above to resolve potential adverse effects.

2.0 LEGISLATION, PLANNING POLICY & STANDING ADVICE

Legislation

- 2.1 Key wildlife legislation of relevance to bats and their roosts are listed below:
- The Conservation of Habitats and Species Regulations 2017 (as amended)
 - Wildlife and Countryside Act 1981 (as amended)
- 2.2 These regulations make it an offence to deliberately capture, injure, kill or disturb (impairing their ability to survive, breed reproduce or rear/nurture their young) an EPS or to damage or destroy a breeding site or resting place of an EPS. Where development is proposed that would result in an offence under the Habitats and Species Regulations an EPS licence needs to be granted by Natural Resources Wales to permit an act that would otherwise be unlawful. This provides for a specific derogation from the legislation, to prevent a legal infringement occurring.

Planning Policy and Guidance

- 2.3 Relevant national and local planning policy and guidance considered within this document are listed below:
- Planning Policy Wales 11 (2021)
 - The Environment (Wales) Act 2016
 - Wrexham Unitary Development Plan 1996-2011

Planning Policy Wales 11

- 2.4 This sets out the government planning policies for Wales and how they should be applied. Chapter 6: Distinctive and Natural Places, is of particular relevance to this report as it relates to ecology and biodiversity.
- 2.5 Technical Advice Note 5: Nature Conservation and Planning (Welsh Assembly Government, 2009), which is referred to by the PPW, provides further guidance in respect of statutory obligations for protecting and enhancing biodiversity and geological conservation and their effects within the planning system.

Environment (Wales) Act 2016

- 2.6 The Environment (Wales) Act 2016 sets out the requirements for the 'sustainable management of natural resources' together with new ways of working to achieve this. Section 6 under Part 1 of the Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (the S6 duty) for public authorities in the exercise of functions in relation to Wales. The S6 duty requires that public authorities

must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and promote the resilience of ecosystems.

Local Planning Policy

2.7 Local planning policies of relevance to ecology, biodiversity and/or nature conservation within the Wrexham Unitary Development Plan 1996-2011 are summarised below:

- **Policy EC4 Hedgerows, Trees and Woodland** – Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and natural landscape and water features, and include new planting in order to enhance the character of the landscape and townscape. Development which results in the loss or significant damage to valuable trees, important hedgerows or ancient woodland sites will not be permitted.
- **Policy EC6 Biodiversity Conservation** - Development either within or close to sites of biodiversity interest will only be permitted where it can be clearly demonstrated that the need for the development outweighs the need to safeguard the intrinsic nature conservation value of the site. Where such development is permitted, damage should be kept to a minimum, and compensatory measures should be provided. Measures to improve the biodiversity value of sites and enhance their natural conservation interest and landscape quality including the establishment of local nature reserves, will be supported.

3.0 BASELINE INFORMATION

Preliminary Roost Assessments - Buildings and Trees

- 3.1 Bat survey work, comprising a Preliminary Roost Assessment of the on-site toilet block and trees to be removed were completed by CSA Environment during July/August 2021. Full details are included in the Bat Survey Report (CSA/1992/06) submitted with the planning application.
- 3.2 These surveys identified single bat droppings in two locations on the exterior of the toilet block and potential roost access features, and was considered to be of 'moderate' roosting potential. Further presence/absence surveys were recommended. Trees to be removed were found to have no suitable roosting features and considered to have 'negligible' potential.

Roost Presence/Absence Surveys

- 3.3 Further dusk emergence / pre-dawn return-to-roost surveys were completed by CSA during August and September 2021. This confirmed the presence of a soprano pipistrelle *Pipistrellus pygmaeus* day roost with a peak count of 1 bat, using two potential roost access points. Full details are included in the Bat Survey Report (CSA/1992/06).

Bat Activity Surveys

- 3.4 In addition to the roosting activity by soprano pipistrelle, activity from common pipistrelle *Pipistrellus pipistrellus*, noctule *Nyctalus noctula*, brown long-eared *Plecotus auritus* and *Myotis* species was also noted within the locality during the transect and static monitoring surveys. General bat activity observed included foraging along a number of woodland edges and was widespread across the Site. Bat activity was generally more concentrated towards the centre and north of the Site. Full details and activity maps are included in the Bat Survey Report (CSA/1992/06).

4.0 PREDICTED IMPACTS AND MITIGATION PRINCIPLES

Development Proposals

- 4.1 Development proposals entail the demolition of the existing toilet block and renovations to pitches, road layout and site facilities.

Predicted Impacts

- 4.2 Based on the available survey evidence, in the absence of avoidance or mitigation measures the development proposals could result in the following impacts relating to bats and their roosts.
- Destruction of a soprano pipistrelle day roost within the toilet block to be demolished and replaced
 - Potential killing and/or injury of low numbers of bats as a result of the demolition of the toilet block;
 - Indirect disturbance to foraging and dispersing bats through changes in lighting and loss of trees.

Mitigation Principles

- 4.3 The principle of mitigation is to ensure that there is no detrimental effect upon the conservation status of bats; this includes both avoidance of killing or injury to individual bats and ensuring that colonies of bats can continue to survive and breed. Natural Resource Wales has determined that the mitigation provided should be proportionate to the size and type of impacts and the importance of the bat population affected.
- 4.4 The approach detailed in the following sections aims to avoid direct impacts to bats during demolition works through the use of precautionary working methods, where required. Measures to replace bat roosting opportunities are also provided to ensure no net loss in opportunities for roosting bats. Key habitat is retained and landscaping and lighting are designed to ensure future foraging and dispersal routes across the Site.
- 4.5 The approach detailed herein is based upon current evidence. If demolition proposals should be delayed for more than two years since the survey works were undertaken (i.e. until summer 2023 or beyond) then repeat surveys should be undertaken to ensure that the roosting status of these buildings has not changed.

5.0 MITIGATION STRATEGY

LICENSABLE WORKS

- 5.1 Regardless of the provision of mitigation, an EPS licence will be required from Natural Resources Wales to allow otherwise unlawful impacts to bats and their roost sites within the toilet block. With the granting of planning permission, an EPS licence application will be applied for, subject to all relevant planning conditions being discharged.
- 5.2 The EPS licencing application requires the preparation of detailed Methods Statement and Work Schedule to be submitted; with Natural Resources Wales requiring up to 30 working days to determine the licence application.
- 5.3 The EPS licence application will need to demonstrate that the favourable conservation status of the bat species identified on-site can be maintained alongside the proposals. Given the bat roost presence is a single soprano pipistrelle day roost, mitigation to ensure the status of roosting opportunities for individual bats and their conservation status is maintained is considered relatively straight forward.

Working Methods

Timing of Works

- 5.4 Works to demolish the toilet block may not commence until the EPS licence is granted by Natural Resources Wales. Mobilisation on-site is due to commence the first week of February, with demolition to commence shortly after on receipt of the EPS licence. Due to the low conservation value of the roosts (individual day roosts of common species) no timing constraints will be enforced on the proposed renovations, however it is recommended that the key maternity months (May-August) be avoided as a precautionary measure. The building is not considered to offer any significant winter hibernation potential as it houses water tanks in the roof void and water systems within the building (such as showers/toilets and sinks) hence is maintained and in working order all year round to avoid malfunctions. This therefore creates warmer fluctuating temperatures unsuitable for hibernating bats which require stable cool temperatures, hence the building strip and demolition works will be timed to fall within the winter months when bats are considered likely to be absent. Exact timings of all works affecting bats will be set out within the EPS licence and agreed with NRW.

Initial Works: Toolbox Talk

- 5.5 A toolbox talk will be given by an NRW bat licensed ecologist to the site manager and all contractors involved at the start of works to inform them of the constraint from bats, the legal implications of the works and safe working procedures to be taken, as covered by the licence. A copy

of the licence documentation will be left on-Site with contact details for the named or accredited ecologist in the event of an emergency. It will be made clear that no contractors should handle a bat in any event.

Erection of Bat Boxes

- 5.6 To ensure replacement roost provision is present prior to demolition, in the event that a bat is found during supervised soft-strip works (see below), a bat box will be erected on a nearby tree. This will comprise a woodcrete Schwegler 2FN box or suitable woodcrete/woodstone equivalent (dependent on availability). If a bat is found during mild conditions and is found to be active, it will be carefully relocated into the nearby bat box for safety, with the bottom of the box bunged to avoid it escaping. This will be removed before the end of the day to allow the bat to emerge and forage.
- 5.7 In the very unlikely event a bat is found in torpor, all works must stop immediately and cannot be moved. Advice will be sought from the supervising ecologist and NRW on how to proceed. Either the roof feature will be carefully replaced (such as a roof tile) to re-cover the bat or the bat will be moved to a safe location as close as possible to the site of discovery.

Pre-commencement Surveys

- 5.8 An internal inspection of the roof void will be undertaken by an NRW licensed ecologist prior to any demolition works to check if any bats are present. If any bats are found which are active and at risk of harm from the intended works, then they will be carefully caught and relocated to the pre-installed bat boxes. As above, if any bats are found in torpor, all works must stop as it is detrimental to the welfare of the bat to move whilst in a torpor state. Any external crevice features will be checked for the presence of bats with an endoscope prior to dismantling (such as roof tiles, wooden boarding etc).

Ecological Watching Brief/Soft-strip

- 5.9 The main impacts to bats and their roosts are likely to occur during demolition of the building, which in the absence of mitigation may result in killing and/or injury.
- 5.10 All impacts to bat roost sites and access points will be subject to an ecological watching brief by the NRW bat licensed ecologist. This will involve the careful hand removal or dismantling of features such as tiles, window frames or wooden boarding at the eaves where bats may be present. The roost site will be fully dismantled during that day to avoid any bats returning to them, but repeat watching briefs may be necessary where works span over a longer time frame.
- 5.11 In the event that an active bat is found during the soft-strips, it will be carefully caught by hand by the licensed ecologist and placed into the pre-installed bat boxes. The box entrance will be temporarily blocked to

prevent the bat from escaping and re-entering working areas, being unblocked at the end of the working day to allow the bat to forage during the night. Once the roof has been dismantled to reveal and roosting opportunities and confirmed clear by the named ecologist, demolition can continue unsupervised.

Emergency Protocol

- 5.12 In the unlikely event that a bat is discovered during any other part of works when the licensed ecologist is not present, the contractors will be instructed to stop work immediately and contact the licenced bat ecologist or Natural Resources Wales for advice. Builders and other contractors are explicitly forbidden from handling bats.
- 5.13 If a species of bat is encountered in the building that was not previously recorded during the surveys and not covered by the issued licence, all works must stop immediately until the named ecologist has consulted with Natural Resources Wales.

Provision of Roosts

- 5.14 A bat box will be installed on a nearby mature trees prior to works commencing, to house any bats found during the soft-strip works. These will be left in-situ after works to provide enhancement for the wider site. The box will comprise a Schwegler 2FN or suitable woodcrete/woodstone functionally equivalent box (dependent on availability) and will be installed by the site management under the guidance of an ecologist.
- 5.15 A bat tube will be installed at both the northern and southern gable ends by the appointed contractors during construction, to compensate for roosting opportunities lost in the existing toilet block, suitable for crevice dwelling bats such as soprano pipistrelle. These will comprise a Vivaro Pro build-in woodstone bat box, or suitable woodcrete/woodstone or functionally equivalent.

Table 2. Suggested bat box products

Bat Box Type	Details
	Vivaro Pro build in woodstone bat box: Designed to be built into the masonry of external walls or beneath rendered surface, self-cleaning and no maintenance. Designed to provide maximum internal space across 2 cavities, allowing for space for larger groups. Manufactured from hardwearing, long-lasting yet breathable woodstone and plywood, with excellent insulation. Boxes are best fixed as high as possible in a sheltered wind-free position, exposed to the sun for part of the day. A clear flight line to the entrance is important.

	The eco crevice bat boxes is most suitable for crevice-dwelling bats, such as pipistrelle species and <i>Myotis</i> species.
	2FN Schwegler Bat Box: Manufactured from long-lasting Woodcrete which will not rot, leak, crack or warp and will last for at least 20 – 25 years. Provides a stable temperature inside and a rough surface for bats to cling on to and climb. The 2FN bat box should be at a height of between 2.5 to 6 metres in an open, sunny position. 2FN bat boxes are most suitable for small numbers of crevice-dwelling bat species.

- 5.16 A further four bat boxes will be installed on mature trees in suitable locations around the wider site to offer enhancement opportunities. The locations of all new roost provisions are shown in the Ecological Enhancements Plan in Appendix A and the Bat Mitigation Plan (CSA/1992/116A) in Appendix B.

Reporting and Monitoring

- 5.17 Confirmation that the measures outlined and relevant EPS licence have been completed will be provided in the form of a licence return to Natural Resource Wales upon completion of the works, along with a short report to the Local Planning Authority.
- 5.18 A Site visit will need to be undertaken by the appointed ecologist to confirm compliance with the measures outline above and in the PEA, and that the mitigation and enhancement proposed has been undertaken to the agreed specification and in the agreed locations by the project completion. Justification for any deviations from the submitted Ecological Enhancements Plan will be given. Photographs will be taken and included within a short report to the Local Planning Authority.
- 5.19 A daytime monitoring visit in 2023 of the bat boxes on trees, bat tubes in the toilet block and roof void will be conducted by the named ecologist using high powered torches to look for evidence of bat use. Any findings will be reported to the local records centre.

NON-LICENSABLE WORKS

Lighting Strategy

- 5.20 A lighting strategy will be implemented at the Site to minimum standards for health and safety, in consultation with a suitable qualified ecologist, to ensure dark corridors are maintained along key habitat features for

bats e.g. the woodland edges and around roosting locations, as well as a dark environment for the CAMC visitors, appropriate to the rural setting of the Site.

- 5.21 Bat activity was widespread across the Site during transect surveys, and recorded on most woodland/tree group edges, with most activity recorded through the centre of the Site, which is already subject to 3m lighting columns and exterior wall mounted lights with no cowls or shields, which remain lit throughout the night (as shown in Photos 1-2 below).
- 5.22 Existing lighting columns will be replaced with low level 1.1m high bollard lights, fitted with modern 3m LED luminaires and cowls, to reduce up lighting. Lowering the height of lighting will reduce the spread of light spill on adjacent vegetation or trees, with LED lighting considered to have less impact on light attracted invertebrate species. Lights on the new toilet block will be modern LED lights fitted with an eyelid cover. Lighting has been restricted to a minimum for safety, to maintain a dark environment and avoid glare into motorhomes and caravans, as favoured by visitors. The selection of modern and low-level luminaires is considered to result in a betterment in light levels on-site and will allow bats to continue to move through the landscape (see Retained Corridors Plan in Appendix C). All lighting should adhere to the Bats and Artificial guidance note (Institution of Lighting Professionals, 2018).



Photograph 1. Lighting levels and 3m lighting column at north-east corner of existing toilet block at dusk (August 2021)



Photograph 2. Example of exterior lighting on northern and eastern elevation of the existing toilet block at dusk (August 2021)



Image 3. Example of eyelid LED luminaire to be used on new toilet block



Image 4, Example of low level bollard lighting to be used on-site

Tree Felling Works

- 5.23 A group of seven semi-mature trees will be felled at the rear of the existing toilet block to accommodate mobilisation and construction of the new toilet block. A further two semi-mature birch and a short 10m section of ornamental hedge will be removed east of the toilet block. The trees were subject to ground-based tree assessments and none were found to support suitable bat roosting features. Trees will be removed prior to commencement in January/February, outside of the bird nesting season.
- 5.24 Trees lost will be replaced with seven native trees, comprising three rowan, two field maple and two beech as part of the proposals, complementing the existing tree assemblage present. Six sections of new hornbeam hedge will also be planted in the south of the Site. Once established these features will provide replacement foraging opportunities for bats on-site. Planting will be conducted by the appointed landscape contractor, with initial establishment under their responsibility, with ongoing management lead by the site management team and appointed tree surgeons as necessary.

Enhancement Measures

Habitat Creation and Enhancement

- 5.25 The wider site alterations and improvement works are due to commence at the start of February 2022. Works are anticipated to take 6 months and complete in August 2022.
- 5.26 In line with local and national planning policy, development works should result in net benefits for biodiversity. An off-site area was identified for ecological enhancement as part of the enhancement strategy for the proposals to demonstrate net benefits for biodiversity. This is an ecologically connected field to the north-east of the existing CAMC site, which is currently under little to no active management. The field currently comprises woodland edge habitat, scrub, ruderal and unmanaged semi-improved grassland.
- 5.27 The grassland will be brought into more favourable management to encourage botanical and invertebrate diversity. This will involve allowing the grass to grow long through the summer, with a once annual cut in August/September once the flowers have set seed. Arisings will be left to dry out for up to 7 days to shed seed, before being collected and removed from site to reduce nutrient build up. Over time, with the reduction in nutrients, botanical diversity should increase, which will encourage invertebrate diversity to increase, for the benefit of foraging bats and birds. The edges of the field will be left as long grassland or scrub, for the benefit of small mammals and potential reptiles. Six new standard trees will be planted within the grassland to complement the parkland setting of the Site, and protected by use of tree guards.

- 5.28 Five new log piles and two invertebrate will also be installed within the grassland habitats, to provide sheltering and nesting opportunities for invertebrates and help boost diversity. Pathways will be created through the meadow for visitors to use, and view the new habitat features. Larger stumps and logs will be used to create natural pay and seating features along the informal mown route to encourage engagement with the environment. This 'wildlife enhancement area' is screened from any existing and new lighting associated with the park, and provides an ecologically connected resource for local bat species, sharing a woodland edge with the central part of the Lady Margaret's Park Site.

Responsibility and timing

- 5.29 Habitat improvement and creation works will be completed by a suitability experienced landscape contractor appointed by the caravan and Motorhome Club. Planting will be conducted at the appropriate time of year for plant specimens (winter for tree planting, cutting regimes in the spring and/or summer) in accordance with good horticultural practice, with initial implementation works to completed by August 2022 or prior to re-opening of the Site in 2023 if winter planting is delayed.
- 5.30 The establishment of the new trees will be under the responsibility of the appointed contractor or site management team to ensure successful early establishment, and will involve checking stakes and guards, tree ties and soil moisture. If any specimens fail, it will be the responsibility of the CAMC to organise a like-for-like replacement in the next planting season. The appropriate management of tree stock will encourage healthy structure and form and ensure the long term benefits for invertebrates and foraging bats as part of the wider woodland and parkland setting.
- 5.31 The appointed contractor or tree surgeon will be responsible for the supply of logs to the wildlife enhancement area. Works to construct log piles will be supervised by an ecologist to ensure these are constructed to the required specification (e.g. location, height, orientation, size of log piles etc). Installation of insect boxes will be guided by an ecologist to ensure these are in sunny southerly locations and constructed to the required specification. Once in place, habitat piles can be topped up with an arisings from tree management activities as this occurs as part of regular site maintenance, to ensure a supply of dead wood.
- 5.32 Invertebrate features will be inspected by site management once annually alongside annual inspections of site wide enhancements (such as bird and bat boxes), and bamboo canes and other features will be replaced as required to ensure an annual supply of nesting chambers to continue to attract invertebrates.
- 5.33 All enhancement measures are shown on the Ecological Enhancements Plan in Appendix A.

Bat Boxes

- 5.34 As described above, a bat box will be installed on a nearby tree at the Site which in-part will provide compensation for roosting features in the short term, as well as an enhancement in the long term. A further four bat boxes on mature trees will be provided in the wider Lady Margaret's Park CAMC site, providing a net gain in roosting opportunities for bats. Such features are suitable for crevice dwelling bats, such as soprano and common pipistrelle, as well as large tree dwelling bats, such as noctule, where natural cavities are currently lacking within many of the perimeter trees.
- 5.35 Boxes will be installed in appropriate locations (i.e orientation/height/cover) by the Site Management team, under the guidance of an ecologist and require no regular maintenance once in place. An annual maintenance check, involving a ground level inspection of the safety and condition of the boxes will be conducted each year, alongside other enhancement features installed in the wider site such as bird and insect boxes. Boxes will remain in-situ for the long term, Bat boxes should only be checked internally by a bat licenced ecologist. Should any repair or maintenance work be required, a suitably qualified ecologist should be contacted for advice prior to any attempts to move or replace a box to check for presence of bats.

6.0 TIMETABLE OF WORKS

6.1 Table 1 below outlines the programme of works for the site in relation to ecological mitigation, compensation and enhancement measures for bats in 2022 and confirms responsible persons.

Timing	Activity	Description	Responsible Person
January/ February 2022	Tree felling	Pre-commencement – felling of nine trees and ornamental hedge to be removed	Tree surgeon
January/ February 2022	Erection of bat box	Pre-commencement – erection of one bat box on nearby tree prior to mobilisation	Site Management/Ecologist
February 2022	Toolbox talk	Commencement – named ecologist to present toolbox talk to site contractors about licence obligations	Named ecologist and contractor
February 2022	Inspection survey	Commencement – prior to any demolition commencing, the named ecologist will conduct an internal and external survey for signs of bats	Named ecologist and contractor
February/ March 2022	Supervised soft strip	Demolition stage – named ecologist/accredited agent to be present for key stages of soft strip works of roost/access features	Named ecologist/accredited agent
April – June 2022	Erection of bat boxes	Construction stage – four bat boxes will be erected in the wider site for enhancement	Ecologist/site management
March – August 2022	Habitat creation/enhancement	Construction stage – five log piles, two insect houses to be installed and five standard trees to be planted at appropriate time of year	Contractor/Ecologist
August 2022	Completion	Expected Site Completion	
May – August 2023	Monitoring	Post-completion – monitoring visit of bat boxes and toilet block to check for evidence of bats	Named ecologist

7.0 CONCLUSION

- 7.1 A soprano pipistrelle day roost was confirmed within the existing toilet block, and at least five species of bat were recorded at the Site during activity surveys, although a number of species are known to foraging and roost within the adjacent Chirk Castle and Parkland SSSI.
- 7.2 A European Protected Species (EPS) licence from Natural Resources Wales will be required to allow otherwise unlawful impacts to confirmed bat roosts within the toilet block. Mitigation measures have been detailed within this report and will be included within a Method Statement and submitted for approval to NRW. The EPS licence application will need to demonstrate that the favourable conservation status of this bat species can be maintained and that there is an overriding reason of public interest for the works proposed.
- 7.3 Mitigation measures will involve sensitive timing of works, a toolbox talk, ecological watching brief of key activities impacting bat roosts/access points, and provision of replacement features. Additional bat boxes are proposed to provide a net gain in bat roosting provision at the Site. Full details of the mitigation strategy will need to be agreed by Natural Resources Wales, with works carried out in compliance with the terms of the licence.
- 7.4 Non-licensable works are to be conducted at the Site that may impact upon bat species. Surveys were conducted to confirm trees to be removed do not support roosting features and replacement tree planting is to be implemented. A sensitive lighting strategy has been prepared to minimise light spill and result in an overall betterment of light levels to allow bats to continue to move through the landscape. Off-site habitat creation and enhancement measures will be implemented to provide net benefits for foraging bats, as well as for other species.
- 7.5 Subject to following the approach to avoidance, mitigation, compensation and enhancement set out in this report, it is concluded that there will be no significant impact to the favourable conservation status of local bat populations resulting from the proposed redevelopment works and the redevelopment is in accordance with Planning Policy EC6 of the Wrexham Unitary Development Plan.

8.0 REFERENCES

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Appendix A

Ecological Enhancement Plan
(CSA/1992/111)



Range of bird, bat and invertebrate boxes installed and habitat piles created to provide new opportunities for wildlife and encourage public engagement with natural environment

Existing grassland in 'wildlife enhancement area' brought into more favourable condition with appropriate management to reduce nutrient input and encourage greater botanical diversity.

Planting of standard trees to compliment parkland setting with an informal walking route and natural play and seating features

- Existing shrub retained
- Margin of longer grassland retained
- Indicative walking route
- Habitat piles x 5 (using logs from tree management/felling works)
- New standard trees (2x beach, 2x Oak, 2x Scots Pine - indicative locations, with protective fence)
- Insect Hotels x2
- Gate
- Bird Boxes x5 (indicative locations)
- Bat boxes x5 (indicative locations)
- Bat tubes x2 (gable ends of new toilet block)

Native hornbeam hedge planted between new premium pitches



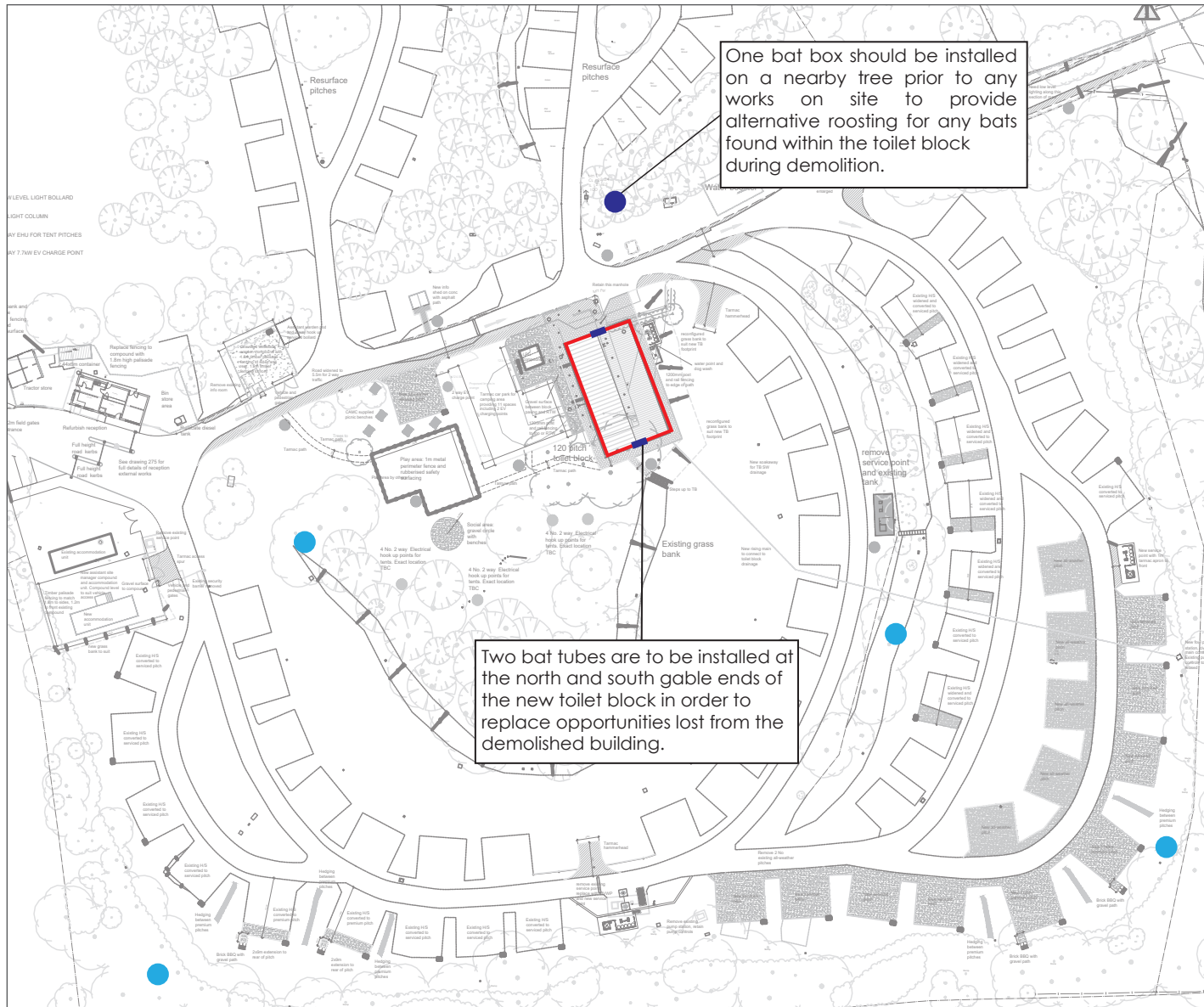
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Project	1992 Lady Margarets Caravan Park	Date	August 2021	Drawing No.	CSA/1992/111
Drawing Title	Ecological Enhancement Plan	Scale	Refer to scale	Rev	-
Client	Caravan and Motorhome Club	Drawn	CM	Checked	CT

Appendix B

E.2.5 Mitigation and Compensation Plan (CSA/1992/116)



One bat box should be installed on a nearby tree prior to any works on site to provide alternative roosting for any bats found within the toilet block during demolition.

Two bat tubes are to be installed at the north and south gable ends of the new toilet block in order to replace opportunities lost from the demolished building.

-  Location of new toilet block
-  Two built-in bat tubes on the north and south gable ends of the new toilet block
-  One bat box (Schwegler 2FN or similar) to be installed on a nearby tree prior to the commencement of any development works at the site (indicative location) for replacement roost provision, and left in-place on completion for enhancement
-  Four bat boxes (Schwegler 2FN or similar) to be installed on trees throughout the wider site (indicative locations) for wider site enhancement

A sensitive lighting strategy has been designed in order to avoid additional light intrusion and the lighting of new roost features, to allow bat species to continue to move through the landscape. Dark corridors have been maintained wherever possible.



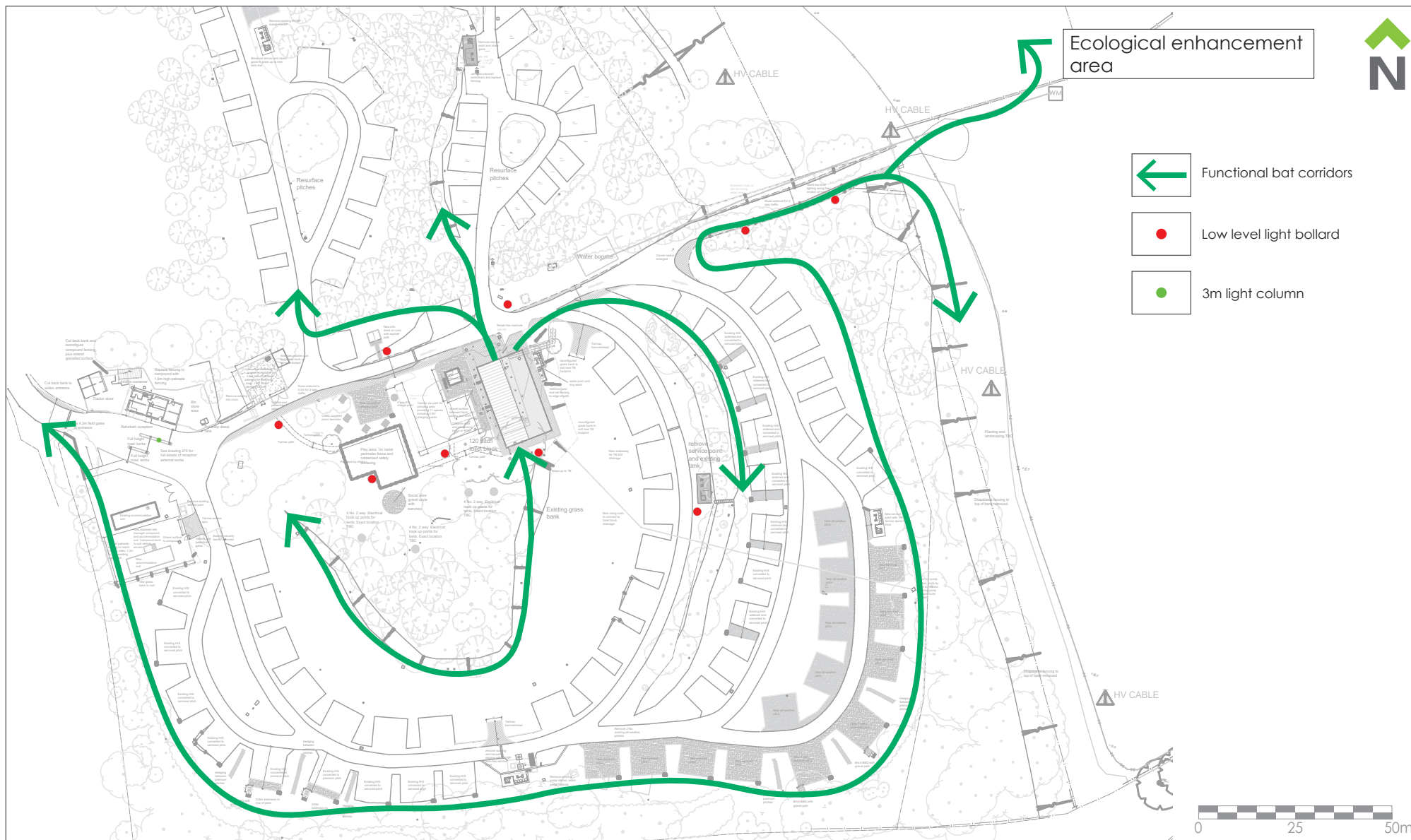
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Project Lady Margaret's Park Caravan and Motorhome Club
Drawing Title E.2.5 Mitigation and Compensation Plan
Client Caravan and Motorhome Club

Date Dec 2021
Scale Refer to scale
Drawn LM
Drawing No. CSA/1992/116
Rev A
Checked AP

Appendix C

Retained Corridors Plan
(CSA/1992/117)



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Project Lady Margaret's Park Caravan and Motorhome Club

Drawing Title Retained Corridors Plan

Client Caravan and Motorhome Club

Date Dec 2021

Drawing No. CSA/1992/117

Scale Refer to scale

Rev -

Drawn TR

Checked AP



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