

Appendix C - Bat Mitigation Licence Application report



Template Method Statement to be used within a Bat Development Licence Application

This template Method Statement is to be used to form part of your Licence Application for a European Protected Species Development Licence. It will be used to determine the impact of the application on the favourable conservation status of the species concerned (Regulation 55(9) (b) of the Conservation of Habitats and Species Regulations 2017). It must be prepared by a consultant ecologist or other suitably qualified person. You are strongly advised to refer to the Bat Mitigation Guidelines¹, and The Bat Survey Guidelines (3rd Edition). Please submit your Application and supporting Method Statement electronically to the contact details provided below.

Please note as of the 1st March 2018 the declaration box found at the end of this template must be included on any Method Statements submitted in support of a licence application, and must be signed and dated by the applicant and ecologist. Any application containing a Method Statement without this declaration will be rejected.

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Method Statement Title:	Bat Mitigation Licence Application Form
Method Statement Version Number:	1
Method Statement Issue Date:	May 2021
Site Address:	2a Llwyn-Y-Cil, Chirk, Wrexham, LL14 5AB

¹ Bat Mitigation Guidelines (IN136) available to download from the Natural England website

Background and Supporting Information

A Executive Summary. No more than one side of A4

2a Llwyn-Y-Cil is a bungalow that is to be demolished as part of a development of a new dwelling. Planning permission has been granted by Wrexham County Borough Council, reference: P/2020/0562 on 26th January 2021.

A preliminary ecological appraisal was conducted by Greenscape Environmental Ltd on 27th July 2020, which found evidence of bats in the loft space. Subsequent activity surveys for bats were considered necessary due to these findings. These were conducted on 3rd August, 18th August and 1st September 2020. The first activity survey was a dusk emergence survey that identified an emergence of an unknown bat under the ridge of the southwest gable. Four soprano pipistrelle (*Pipistrellus pygmaeus*) bats were recorded during the second emergence survey. A total of twelve soprano pipistrelle bats were recorded to emerge on the third activity survey across four different access points on the southwest gable.

A data search was conducted using NBN Atlas for commercially available records as well as records of protected species collected by Greenscape Environmental across previous surveys. This was undertaken as part of the initial preliminary ecological appraisal. Records found include Daubenton's bat (*Myotis daubentonii*), Natterer's bat (*M. nattereri*), noctule (*Nyctalus noctula*), common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*P. pygmaeus*), brown long-eared bat (*Plecotus auritus*) and lesser horseshoe bat (*Rhinolophus hipposideros*). These records include maternity roosts of more than 100 lesser horseshoe bats and soprano pipistrelle at Chirk Castle, 1.2km west.

The existing building will be demolished to clear space for a detached dwelling and double garage. The demolition will see the loss of a small soprano pipistrelle maternity roost (peak of 12 bats) with four access points. Without the appropriate mitigation there is the potential for death and/or damage to individual bats. The method statement highlights a strategy for the safe demolition of the building to minimise potential negative impacts on bat species, compensation for the loss of a roosting site and enhancements.

The loss of a small maternity roost of soprano pipistrelles is of medium conservation significance according to the Bat Mitigation Guidelines (Figure 4, Page 39). Timing constraints are therefore considered necessary during the demolition of areas sensitive to bats, specifically the southwest gable, where the access points have been identified. Alternative roosting provisions will be provided in the form of a Schwegler 3FF maternity bat box on the southern side of the cypress trees along the southern boundary. This will be erected prior to the demolition of the bungalow, which will take place after October 1st when it has been established that the bats have left. The demolition of areas sensitive to bats and the southwest gable will be done by hand under supervision by a suitably licenced ecologist (ecological clerk of works – ECoW). If a bat is found, it will be checked and released into the bat box by the ECoW. If a bat of a previously unidentified species is found then work will stop and NRW contacted to amend this licence. Long term provision in the form of an integral bat box will be included in the new build. It is recommended that these are monitored for three years as per by the Bat Mitigation Guidelines. Work is due to being in November 2021 as soon as the licence is granted and is expected to be completed by November 2023. The work will be audited by Peta Marshall, also an accredited agent of this licence.

If a bat is damaged during works it will be nursed back to health either by the licence-holder, or taken to Cuan Wildlife centre. If the bat is severely damaged beyond chance of healing it will be taken to a vet to be euthanised. All care will be taken to avoid this by having the suitably experienced ecologist on site.

The Conservation of Habitats and Species Regulations 2017

Ownership and responsibility of the site, including the maintenance of the bat box, will remain with the property owner post-development.

B Introduction

B.1 Background to activity/development

The site is a prefabricated, cast concrete bungalow, with a pitched concrete tile roof. The design of the bungalow is outdated and is uneconomical to run and live in. The demolition of the bungalow and replacement with a new modern building, designed to be in keeping of the local area, will reduce and maintain low running costs. The renovation and extension of the bungalow is not considered justifiable as the cost of updating the bungalow to modern standards would be prohibitive compared to the values of the property.

B.2 Full details of proposed works on site that are to be covered by the licence

Planning has been granted by the Wrexham County Borough Council (P/2020/0562). The approximate work schedule is for the demolition of the bungalow, commencing with the stripping of the roof once the licence application has been approved, between October and April 2022. This will be done carefully by hand in areas sensitive to bats, specifically around the southwest gable, where the hanging tiles will also need to be removed carefully. All of the demolition works are to be conducted under licence, as the development will lead to the permanent loss of a small maternity roost, as well as disturbance.

The licence will also cover the capture and handling of bats which may be necessary during the soft demolition of the southwest gable end and along the ridge. These works will be done under the supervision of an ECoW.

The anticipated start date may alter depending on the latest government advice in the coronavirus pandemic.

B.3 Actions requiring licensing,

The licence will cover the destruction of a known roost space, and potential capture, handling and relocation of soprano pipistrelle bats to a previously erected alternative roost space.

C Survey and site assessment**C.1 Existing information on the bat species at the survey site.**

A data search was purchased from Cofnod. This includes records of common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*P. pygmaeus*), Noctule (*Nyctalus noctula*) and lesser horseshoe bat (*Rhinolophus hipposideros*). The majority of these records are from Mynattyn Wood, approximately 500m northwest of site. The records range from 1998 to 2015.

Records from Greenscape Environmental within the wider landscape were checked alongside commercially available records from NBN Atlas, and include Daubenton's bat (*Myotis daubentonii*), Natterer's bat (*M. nattereri*), noctule, common pipistrelle, soprano pipistrelle, Nathusius pipistrelle (*P. nathusii*), brown long-eared bat (*Plecotus auritus*) and lesser horseshoe bat.

C.2 Statutory sites notified for the species (SSSIs or SACs) within 10km

Immediately to the west of the site lies Chirk Castle and Parkland SSSI which is a region of ancient woodland pasture and parkland, which supports roosts of several bat species, including lesser horseshoe bats. There are thirteen designated sites within 10km of the site boundary. Three of these are designated for bats, although none of the sites are designated for soprano pipistrelle bats. Sites designated for known hibernation and breeding sites of lesser horseshoe bats include; Chirk Castle and Parkland, Pandy Quarries and Llantysilio Mountains and Minera. NRW have been contacted for comment regarding the close proximity of Chirk Castle and Parkland SSSI. At the time of submission no response has been received.

Type of Designation	Site Name & Ref	Reason	Distance & Direction
Statutory - SSSI	Chirk Castle and Parkland	Designated for bats	Immediately West
Statutory – SSSI & SAC	River Dee and Bala Lake	Not designated for bats	740m South
Statutory – SSSI & SAC	Nant-Y-Belan and Prynela Woods	Not designated for bats	3.8km Northeast
Statutory - SSSI	Dinas Bran	Not designated for bats	6.1km Northwest
Statutory - SSSI	Fernhill Pastures	Not designated for bats	6.2km Southeast
Statutory - SSSI	Caeau Pen-Y-Coed	Not designated for bats	6.6km Northwest
Statutory - SSSI	Stryt Las A'r Hafod	Not designated for bats	7.6km Northeast
Statutory – SAC	Johnstown Newt Sites	Not designated for bats	7.6km North
Statutory - SSSI	Shell Brook Pastures	Not designated for bats	7.9km East
Statutory – SSSI	Pandy Quarries	Designated for bats	8.0km West
Statutory - SSSI	Ruabon/Llantysilio Mountains and Minera	Designated for bats	8.1km North
Statutory – SSSI & SPA	Berwyn	Not designated for bats	8.5km West
Statutory – SAC	Berwyn a Mynyddoedd De Clwyd	Not designated for bats	8.5km West

C.3 Objectives of the survey.

The objective of the preliminary ecological appraisal conducted in July 2020 was to determine if the site had potential to support protected species, particularly bats. A small number of droppings were found during the ecological appraisal, which prompted phase 2 surveys for bats. The building was assessed for potential to support hibernating bats and none was found.

The phase 2 surveys were conducted to identify as far as possible any bats roosting within the building. These were designed to determine the number of individuals and what species are using the building, what type of roost was present, where the access points were located.

All surveys were conducted to support a planning application for a replacement dwelling.

C.4 Scaled plan/map of survey area

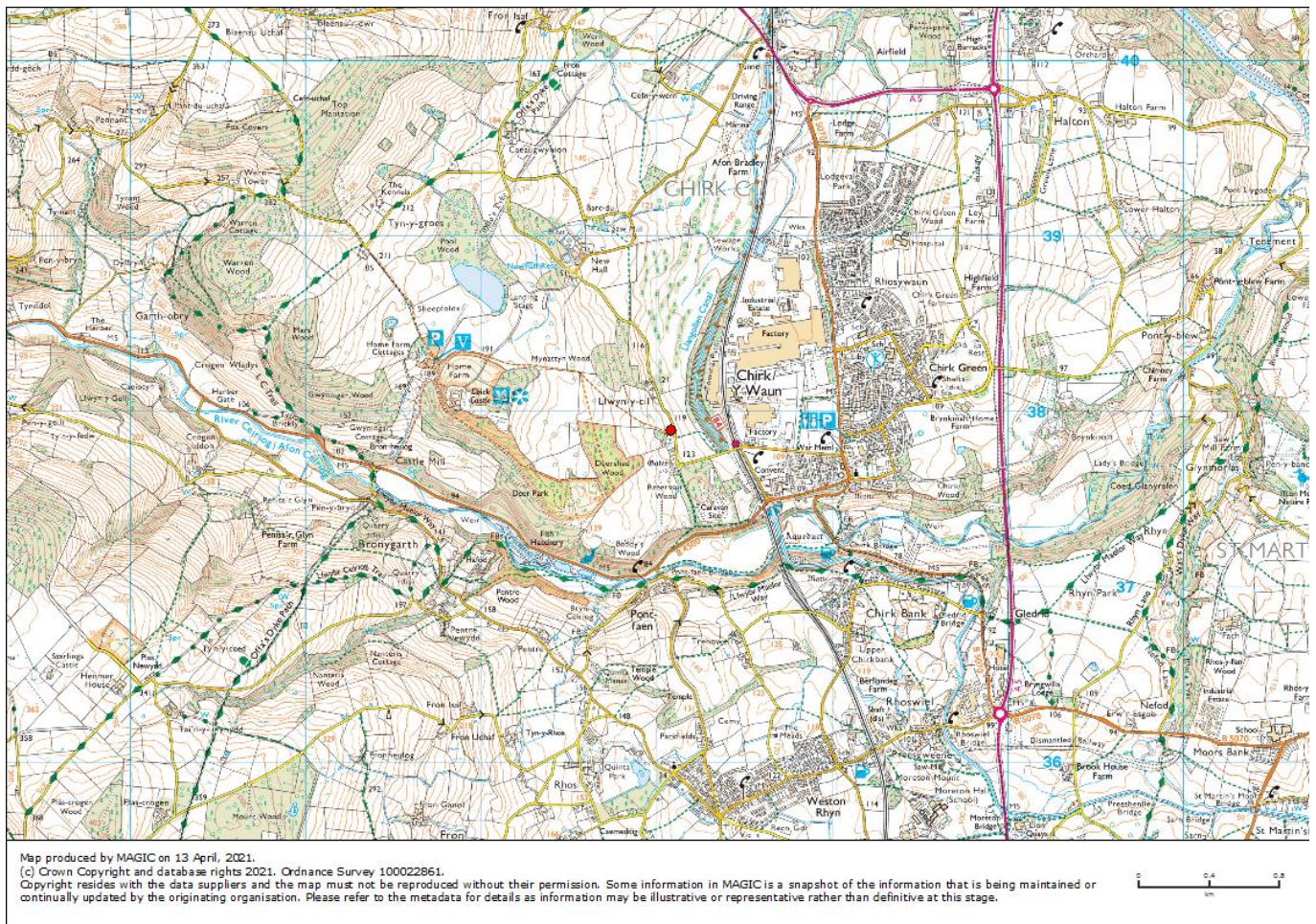


Figure 1. Location map at 1:25,000



Map produced by MAGIC on 13 April, 2021.
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Figure 2. Location map at scale 1:50,000

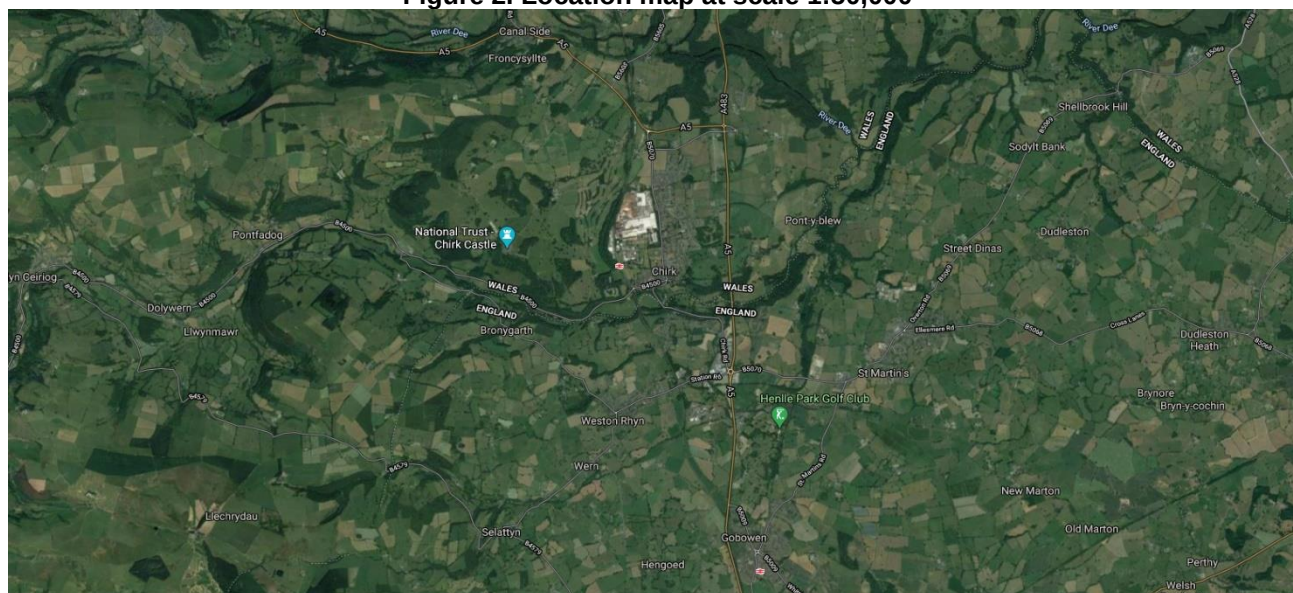


Figure 3. Aerial location map

C.5 Site/habitat description (relevant to bats)

The only habitat of value to roosting bats within the site is the bungalow. Which is a prefabricated 1970's concrete structure with a concrete tile roof which is supported by a timber frame. Concrete hanging tiles are located on both gables. The bungalow is immediately surrounded by amenity grassland, a garage, and kennels. The garden area is surrounded by large trees to the south and west, with a row of cypress along the southern boundary.



Figure 4. Southwest elevation of property



Figure 5. Hanging tiles on southwest gable



Figure 6. Interior of roof void



Figure 7. Garage located adjacent to the northeast gable

C.6 Field survey(s).

Date	Time Start – End (Sunset Time)	Structure	Equipment Used	Weather
27/07/2020	13:00-15:00	Bungalow	Strong torch, camera	21°C, no rain, F1 wind, no cloud cover
Comments:	Visual inspection. One surveyor used. Chloe Sheil			
03/08/2020	20:50-22:31 (21:01)	Bungalow	Strong torch, Anabat SD1, Anabat Walkabout, Echometer Touch	14-12°C, F1 wind, no rain, <10% cloud cover
Comments:	Two surveyors used. Ben Jones and Chloe Sheil			
18/08/2020	20:05-22:03 (20:31)	Bungalow	Strong torch, Anabat Walkabout, Anabat SD1	19-18°C, <10% cloud cover, F1 wind, no rain
Comments:	One surveyor used.			
01/09/2020	19:45-21:30 (20:00)	Bungalow	Strong torch, Anabat Walkabout, Anabat SD2	16-14°C, F1 wind, no rain, 100% cloud cover
Comments:	One surveyor used.			

There were no constraints of the surveys. All areas were accessible for the surveys and were conducted at an appropriate time of year and in suitable weather conditions.

C.7 Survey Results.

Date	Time Start–End	Species and Numbers	Roost Type	Structure	Roost Location	Access Points
03/08/2020	20:50-22:31	Soprano pipistrelle (1)	Day	Bungalow	Southwest gable end	Gap under ridge
Notes/ Observations:	One bat was observed emerging from under the ridge on the southwest gable end at 21:20. This bat did not echolocate, but the timing and context suggest it was a soprano pipistrelle. The first bat recorded was a noctule foraging over the site at 21:15, approximately 14 minutes after sunset. Other activity included foraging by soprano pipistrelles and brown long-eared bats.					
18/08/2020	20:05-22:03	Soprano pipistrelle (4)	Day	Bungalow	Southwest gable end	Gap under ridge and via missing tile above flat roof
Notes/ Observations:	The first bat recorded was a soprano pipistrelle emerging from under the ridge on the southwest gable end at 20:50, approximately 19 minutes after sunset. A total of four soprano pipistrelles were seen emerging from the southwest gable end of the bungalow and one was seen re-entering. The peak count of soprano pipistrelles roosting in the gable end was four. Other activity included and noctules commuting over site and Daubenton's bats foraging around the garden.					
01/09/2020	19:45-21:30	Soprano pipistrelle (12)	Maternity	Bungalow	Southwest gable end	At least four different access points under hanging tiles, including gap under ridge and missing tile above flat roof
Notes/ Observations:	A total of 12 soprano pipistrelles were seen emerging from the southwest gable end of the bungalow. Four different access points were used. The first bat recorded was a noctule at 20:03, approximately 3 minutes after sunset. Other activity included a common pipistrelle commuting across the site and a lesser horseshoe bat foraging around the western hedgerow.					

Summary: A peak count of twelve soprano pipistrelle bats were identified during the third activity survey. These were all seen to emerge from the southwest gable from four distinct access points were used. All bats flew south after emergence, to forage in the garden and around the mature trees.

Other activity included foraging soprano pipistrelles, brown long-eared bats, noctule bats, Daubenton's bats, common pipistrelles and lesser horseshoe bats.



	Roost location
	Droppings location
	Flight paths

Figure 8. Survey results showing roost and dropping location and flight path



Emergence points

Figure 9. Emergence points on southwest gable

C.8 Interpretation/evaluation of survey results (See Bat Mitigation Guidelines section 5.8 and Bat Survey Guidelines Ch11)

The results show that there is a small maternity roost of soprano pipistrelle bats occupying the southwest gable end. Four access points were identified across the gable end, ranging from beneath the apex to beneath the hanging tiles. This number of individuals found of this common species are consistent with a maternity roost. Figure 4 on page 39 of the Bat Mitigation Guidelines (Jan 2004) shows that this is of moderate conservation significance. Timing constraints are therefore necessary for the demolition of the building. Bats are not to be left without a roost and must be given time to find a replacement. Monitoring for two years is preferred but is not a strict requirement, the council has requested monitoring over three years.

D Impact assessment – potential impacts in absence of mitigation/compensation. See Bat Mitigation Guidelines (section 6.2) and Wray et al (2010) ²

D.1 Short-term impacts: disturbance

Short-term impacts include the obstruction of flight paths by scaffolding or other means to access the roof. The development would cause disturbance via dust, noise, and vibrations.

Without mitigation soprano pipistrelles could be left without a roost in the locality and may be killed or injured during the demolition of the building.

D.2 Long-term impacts: roost modification

There will be no modification of the roost as the roost is to be lost.

D.3 Long-term impacts: roost loss.

The development would lead to the permanent loss of a roost via the demolition of the entire bungalow. This is a moderate impact at a local level and low impact at a regional and national level. The maternity roost of twelve soprano pipistrelles (which are a common species) is of moderate conservation significance.

D.4 Long-term impacts: fragmentation and isolation.

No changes in the surrounding habitats are expected. None of the boundaries are to be removed during the development and the proposed new dwelling and garage are to replace the existing buildings within the same location, therefore flight paths used for foraging and commuting are to remain.

D.5 Post-development interference impacts.

Per the recommendations in section 6.3.2 of the ecology report 20-07 192.1R by Greenscape Environmental Ltd, any new artificial lighting erected during and post-development is to be directed away from the site boundaries, trees and hedges. The lighting will also be directed away from any enhancements erected for roosting bats, including the recommended bat box which is to be erected. Additionally, there will be no direct illumination of the SSSI located immediately to the west of the development site. All domestic lighting will be below 10 lux, orientated towards the ground and controlled by PIR (Passive Infra-red), set on a short timer.

² Wray, S., Welss, D., Long, E. & Mitchell-Jones, T. (2010) Valuing bats in ecological impact assessment. In Practice, No 70, Institute of Ecology and Environmental Management

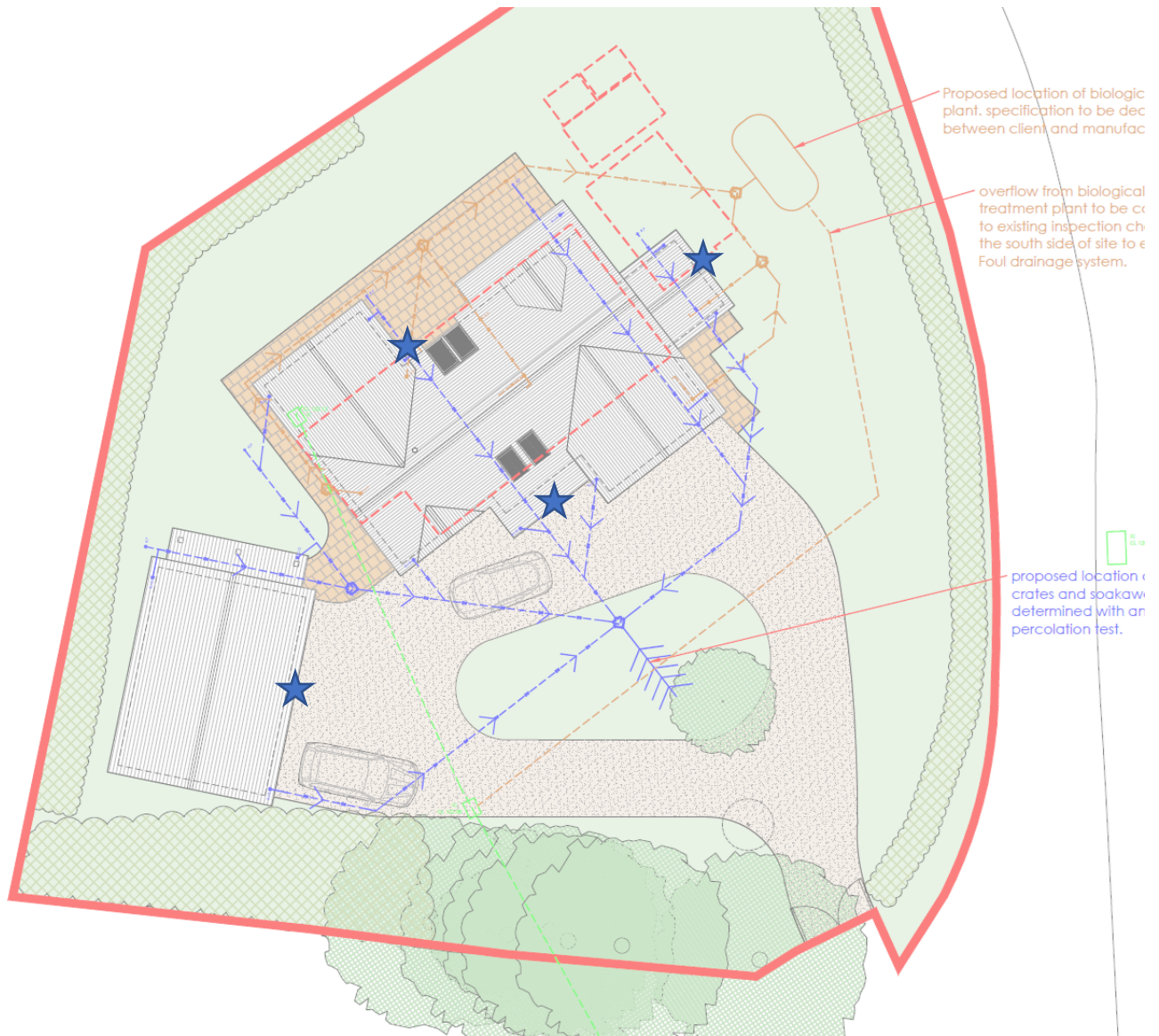


Figure 10. Location of lighting over front door, back door, boot room door and garage

D.6 Predicted scale of impact on species status at the site, local county and regional levels.

The development may have a moderate impact at a site level, as twelve soprano pipistrelle bats were identified, determining the roost to be a maternity roost. The loss of a roost of this size is of low significance at a county and regional level.

The favourable status of the species is unlikely to be reduced by the development, due to the appropriate mitigation and compensation that will be followed during the development. The type of roost identified has been determined to be of moderate conservation status following the guidance of the Bat Mitigation Guidelines.

A bat box suitable for maternity roosts will be erected pre-development, which will provide suitable compensation during the development. Additionally, to this an integral bat box will be installed, which will provide permanent appropriate roosting opportunities for bats post-development.

Delivery Information – Mitigation, compensation and monitoring

Description of how the impacts will be addressed in order to ensure no detriment to the maintenance of the population at a favourable conservation status.

E Works to be undertaken

Please identify which works will be undertaken or supervised by a licensed ecologist

E.1 Capture and exclusion (if applicable).

A suitably licence and experienced ecologist will be employed as an ecological clerk of works (ECoW) to oversee the removal of the hanging tiles where the roost access points have been identified. The ECoW will also be available for support should a bat be found at any point during works. The ECoW will capture the bat before checking it for health and releasing if appropriate.

Once the tiles are removed the bats will be effectively excluded, as the roost and access points will have been destroyed. The work is being timed to avoid peak maternity season, so one-way exclusion measures are not considered appropriate. The work to demolish the bungalow will take place after 1st October when the ECoW has established the maternity roost has dispersed. The demolition will be completed before the end of April.

E.2 Bat roosts and habitat

E.2.1 In-situ retention of roost(s)

There will be no retention of the current roost.

E.2.2 Modification of existing roost(s)

As the bungalow is to be demolished there will be no modification of the existing roost.

E.2.3 New roost creation (including bat houses and bat boxes)

As detailed in section 6.3.2 of report 20-07 192.1R by Greenscape Environmental Ltd. a woodcrete maternity bat box, Schwegler 3FF (or equivalent) will be erected in a nearby tree. This will be installed at a height of 3-4m in a southerly or westerly facing direction. The bat box will be erected prior to the soft demolition of the bungalow and will be kept in place for as long as practically possible or a minimum of five years. The ECoW will be on site to oversee the erection of the bat box prior to the works.



Figure 11. Schwegler 3FF

An integral bat box will also be installed beneath the timber cladding, which will extend over the box to disguise the box. One timber cladding board will be raised by at least 15mm to allow bats entry. This will be at a height of 3-4 m on the western gable end. Lining beneath the roost area will be bitumen hessian to ensure bats cannot come into contact with modern breathable membrane.



Figure 12. Integral bat box



Figure 13. Approximate bat box location

E.2.4 Maintenance &/or modification of new and existing habitat

The development as proposed will not include the removal of any vegetation. The existing boundaries to the property (that are within the control of the applicant), will be retained as part of this and any future developments.

Any new artificial lighting during and post-development is to be directed away from the site boundaries, trees and hedges, and away from the newly installed bat boxes and the SSSI immediately west. All future external lighting will be controlled by Passive Infra-Red, set on a short timer and orientated towards the ground. This is based on guidance from ILP and BCT.

A warm white spectrum (ideally >2700Kelvin) should be adopted to reduce blue light component. Lights should feature peak wave lengths higher than 550nm to avoid the component of light most disturbing to bats. This will be achieved by using LED lights.

E.2.5 Scaled maps/plans

A bat box (blue star on the plans below) will be integrated behind the timber cladding to provide permanent roost features. A Schwegler 3FF (yellow star on the plans below) or equivalent box will be erected in the cypress trees on the southern boundary.

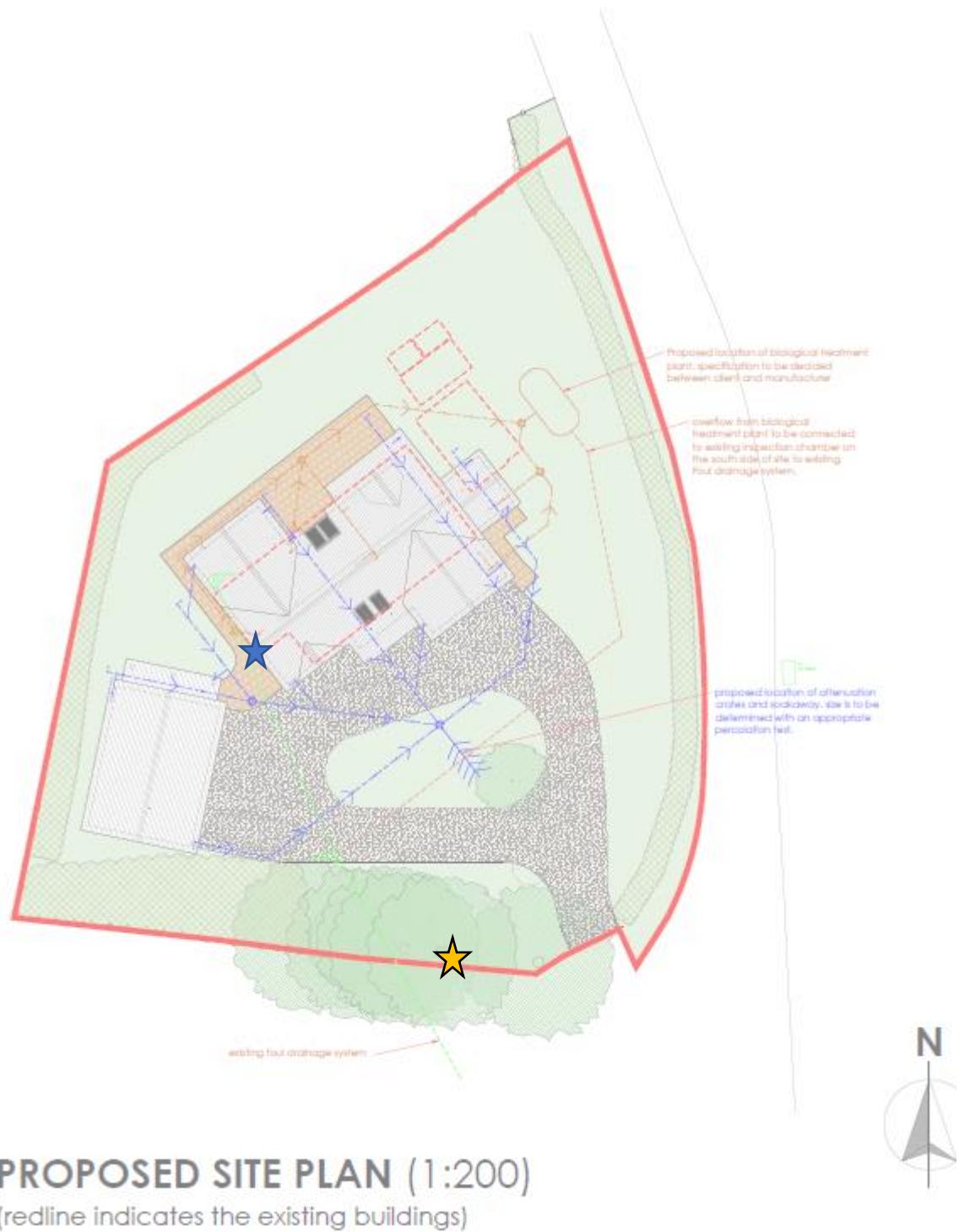


Figure 14. Site map showing enhancements for bats and birds

E.3 Mechanisms for ensuring delivery of mitigation and compensation measures

Delivery will be implemented by the owners of the site through a Natural Resources Wales European Protected Species licence, which ties them to the conditions outlined in this Method Statement document. It will be the responsibility of the owner to deliver the mitigation strategy in its entirety and to engage a suitably qualified ecologist to undertake specialist works where necessary.

To fulfil reporting obligations under the Habitat Directive the ecologist (on behalf of the applicant) will provide a report, no more than four weeks after the licence expires, detailing findings of any bats encountered during the works, together with the measures taken and outcomes in terms of recovery of and maintenance of the population.

The owner will be in regular contact with the building contractors during the construction period to ensure that the contents of the delivery and compensation plan are adhered to. Provision of the measures will be enforced by the terms of the Conservation of Habitats and Species Regulations (2017) and will be the ultimate responsibility of the licence holder (site owner).

The work on site will be audited by Peta Marshall, also an accredited agent on this licence.

E.4 Mitigation contingencies

Mitigation contingencies are considered unlikely to be necessary due to the timing of the renovation works for outside of maternity season, when the likelihood of bats being present is reduced. However, should a problem arise, an alternative solution would be sought in consultation with NRW.

If a bat species previously unidentified on site is found, work will stop and NRW consulted to modify the licence appropriately. If a bat is damaged during works, it will be nursed back to health either by the licence-holder or taken to Cuan Wildlife centre. If the bat is severely damaged beyond chance of healing it will be taken to a vet to be euthanised.

If a bat box is seen to fail within the first two years it will be replaced at cost to the developer.

E.5 Biosecurity risk assessment

All mitigation works are to be undertaken within or immediately adjacent to the site itself and there is no requirement to move bats or other species off-site. If bats are discovered (alive or dead) which have symptoms of white nose syndrome (*Geomyces destructans*) then NRW will be notified immediately, and works will cease until such times as advice has been given by NRW. All personnel, tools and equipment which has come into contact with such a bat will be treated with an appropriate anti-fungal agent.

No non-native invasive species were identified on site during the PEA conducted by Greenscape Environmental Ltd. There is therefore no risk of spread of non-naïve invasive species and disease at this site.

F Post-development site safeguard

F.1 Habitat/site management and maintenance

The site will remain in the ownership of the applicant, and all management and maintenance will remain with them.

The applicants are aware of the need to provide roost features for bats, and so these will be retained in perpetuity.

F.2 Population monitoring, roost usage etc.

As per the guidance in the Bat Mitigation Guidelines (Figure 4, Page 39), it is preferred that any enhancements for bats are monitored for 2 years. This is not a strict requirement, however, the council have requested monitoring over a period of no less than three years. This will be done by means of an activity survey. These surveys will be carried out in summer, by a suitable licenced and experienced ecologist. Result of the surveys will be submitted to NRW in the licence report.

F.3 Post-development mitigation contingencies

NRW will be contacted for advice and failing boxes or enhancements will be replaced at the cost of the developer if deterioration or damage is noted within two years post-development.

F.4 Mechanism for ensuring delivery of post-development works

There are no section 106 agreements required as ownership will remain with the applicant.

G Timetable of works.

Timing	Activity	Impacts on bats and mitigation	Record of action taken
Activities Prior to Licence Issued			
May 2021.	Licence submitted to NRW.	None.	
Prior to any building work commencing on site (Can be undertaken prior to licence being issued)	Erect bat box on tree to the south. This work will be undertaken in advance of all other work being undertaken on the site.	Provide alternative bat roost before work commences.	
Activities After Licence Issued			
Prior to works commencing on site	The licensee will advise NRW Species Officer of the start date for the works.	None.	
Prior to any work on building October 2021 – November 2023 (work start and finish dates)	All site workers will be inducted by the licensee (ECoW) or delegated accredited agent of Greenscape Environmental Ltd. This induction will cover the legal status of the species, the method of working and action to be taken if protected species are encountered.	Licencee to provide site induction/toolbox talk.	
After licence issued and site induction and immediately prior to work commencing. October 2021.	Pre-commencement check by the ECoW prior to any demolition activities around the southwest gable and roof.	None	

The Conservation of Habitats and Species Regulations 2017

As soon as licence issued, and site induction completed. October 2021 – April 2022	Watching brief – ECoW to supervise the removal of the roof and hanging tiles.	Loss of roosting opportunities. Works supervised by bat specialist to avoid harm to bats. Re-location of any bats found during works.	
October 2021 – April 2022	Demolition of the remainder of the building. Disturbance by noise, dust and lighting anticipated	ECoW available on-call, Bi-monthly visits	
March 2022 - October 2022	Bat roosting features detailed in section E.2.1 installed.	Bat specialist available on-call to provide advice to ensure that entry/ exit points are fitted correctly, and other features of roost correctly built.	
Once work is complete; latest autumn 2023	ECoW inspection upon completion of works to ensure that mitigation measures detailed in licence application have been incorporated during works.	Post-development checks by bat specialist to audit that bat mitigation and compensation features built correctly	
Post-development	Suitably licenced ecologist to conduct monitoring surveys to determine success or failure of replacement habitat	None	

H Land Ownership – Mitigation Site

H.1 Mitigation Site/Compensation Site Ownership

All mitigation will be undertaken on land owned by the applicant.

H.2 Mitigation Site/Compensation Ownership post construction

All lands used for mitigation will remain under the ownership of the applicant.

I Declaration

I declare that should a licence be granted, the work as proposed in this Method Statement will be strictly adhered to. I understand that any deviation from the works as proposed in this Method Statement without agreement from NRW would result in a breach of the licence.

NB. Applicants should note that it is an offence under regulation 59 of the Conservation of Habitats and Species Regulations 2017 to knowingly or recklessly provide false information in order to obtain a licence.

Signature of the Applicant	E A Rogers	Date	
<i>For electronic submissions please insert an electronic signature above or place an x in the box opposite to confirm agreement with the declarations above.</i>			☐
Full name in BLOCK LETTERS	EDWARD ALAN ROGERS		
Signature of the Ecologist		Date	
<i>For electronic submissions please insert an electronic signature above or place an x in the box opposite to confirm agreement with the declarations above.</i>			☐
Full name in BLOCK LETTERS	BEN JONES		

J Annexes

K.1 Pre-existing survey reports

K.2 Raw survey data.