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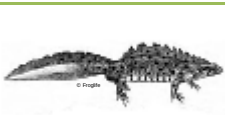
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Inspection and Assessment in Relation to Bats and Birds

October 2020

4-6 Regent Street
Wrexham
LL11 1SA

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4-6 Regent Street, Wrexham, LL11 1SA
Inspection & Assessment in Relation to Bats & Breeding Birds

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Executive Summary

As part of a planning application regarding a disused former shop and office at 4-6 Regent Street, Wrexham, a daytime inspection and assessment in relation to bats and breeding birds was undertaken by Tyrer Ecological Consultants Ltd during October 2020. The survey was commissioned by D.S. Jones & Co. and it is understood that proposals entail the redevelopment of the existing structure into 14 new apartments.

The following key ecological features and associated recommendations have been identified:

Bats: Due to the construction of the property and significant visual limitations, it was not possible to categorise the building's potential for bats in accordance with current Bat Conservation Trust (BCT) guidelines. Instead a set of precautionary Reasonable Avoidance Measures (RAM's) involving a professional ecologist supervising the dismantling of any Potential Roost Features (PRFs) that may be present is recommended. *Should any evidence of bats be identified by the attending ecologist, works must cease immediately and a Natural England EPSML may be required.*

Breeding Birds: Opportunities could be present on the roof suitable for use by common bird species. *The report will recommend that all demolition/clearance operations are undertaken outside the nesting season (March-August inclusive), unless it can be conclusively demonstrated by a competent ecologist that nesting birds are absent.*

Biodiversity Net Gain: A series of biodiversity enhancement measures are recommended within Appendix II which entail enhancement for nesting birds, bats, and invertebrates.
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1.0 Introduction & Reason for Survey

- 1.1 As part of a planning application regarding a disused former shop and office at 4-6 Regent Street, Wrexham, a daytime inspection and assessment in relation to bats and breeding birds was undertaken by Tyrer Ecological Consultants Ltd during October 2020. The survey was commissioned by D.S. Jones & Co. and it is understood that proposals entail the redevelopment of the existing structure into 14 new apartments (Figure 1).
- 1.2 As part of the Local Authority's Planning Policies ecological surveys are generally required, particularly where a specially protected species is or may be present and could be affected by the proposals for which the application seeks consent.
- 1.3 The aim of the inspection was to ascertain if the building is of value to bats and breeding birds; if they were found to be suitable for bats or signs of use was located then more detailed surveys would be recommended i.e. dusk/dawn emergence/re-entry surveys during the main active season of bats which is May – August. If bat/s or their roost/place of rest/shelter is subsequently affected by the work, then a European Protected Species Mitigation Licence would be required to proceed with the development.
- 1.4 The optimum time to investigate buildings for evidence of a bat roost is May – August, however that is not to say they cannot be inspected and assessed outside of that time and frequently the results can be conclusive, which can save time and expense for planning applicants but it should be borne in mind that equally the inspection can be inconclusive.
- 1.5 In addition to bats the site was assessed for its potential to offer nesting provision for breeding birds; if the survey results indicate that such species may be affected by the proposals then recommendations would be made accordingly.
- 1.6 If additional surveys are required following the initial site visit the report will outline the details of those further requirements.

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Figure 1: Existing site layout (top) and proposed layout (bottom (©D.S. Jones & Co.))

2.0 Legislation & Policy

- 2.1 Planning Policy Wales, 10th Edition (2018) is the Welsh Government's policy document and it describes the land use context for using land sustainably. The document supports every strategy published by the Welsh Government and it is supplemented by a variety of Technical Advice Notes (TAN's) and any circulars.

- 2.2 There are several plans, strategies and national, sub-regional and local policy statements which provide a framework for development in the Plan area. The Planning and Compulsory Purchase Act (2004) makes it a requirement for local planning authorities in Wales to prepare a Local Development Plan (LDP) for their areas.

Wrexham Borough Council prepared a plan, namely the 'Wrexham Unitary Development Plan (1996 – 2011)', which was formally adopted in February 2005 and supersedes any previous development plans for the area. A new plan, the 'Wrexham Local Development Plan 2 (2013 - 2028)', which will replace the current adopted plan, is currently under review. Until this new plan is adopted, the Wrexham Unitary Development Plan remains in effect.

- 2.3 Planning authorities must therefore follow a step-wise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, or minimized, or mitigated, and as a last resort compensated for; enhancement must be secured wherever possible.
- 2.4 The first priority for planning authorities is therefore to avoid damage to biodiversity and ecosystem functioning. Where there may be harmful environmental effects, planning authorities will need to be satisfied that any reasonable alternative sites that would result in less harm, no harm or pro-gain have been fully considered.
- 2.5 Planning authorities should ensure that features and elements of biodiversity value are retained on site, and enhanced or created where ever possible, by adopting best practice site design and green infrastructure principles. The provision of up to date ecological survey information will assist in this process. Where necessary, planning authorities should seek to modify the development proposal through discussion with the applicant at the earliest possible stage. Biodiversity and green infrastructure modifications should draw on the issues and opportunities identified in a preliminary assessment. In some circumstances, it will be appropriate to attach planning conditions, obligations or advisory notes to a permission, to secure biodiversity outcomes.
- 2.6 When all other options have been exhausted, and where modifications, alternative sites, conditions or obligations are not sufficient to secure biodiversity outcomes, offsite compensation for unavoidable damage must be sought. This should normally take the form of habitat creation, or the provision of long-term management arrangements to enhance existing habitats and deliver a net benefit for biodiversity.

Where the adverse effect on the environment clearly outweighs other material considerations, the development should be refused.

- 2.7 The Environment (Wales) Act 2016 ("the Act") - requires local planning authorities to have regard to area statements in the development of Local Development Plans.

Part 1 of the Act promotes sustainable management of natural resources, and in Part 1 section 6 states:

“A public authority must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions.”

- 2.8 This is supported by Policy EC6 of the Wrexham Unitary Development Plan, which states:

“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.”

- 2.9 All British bats and their ****roosts** are afforded protection under Schedule 5 of the Wildlife & Countryside Act (1981) (as amended) and are listed in Schedule 2 of the Conservation of Habitats & Species Regulations 2017. When dealing with cases where a European Protected Species (all UK bats) may be affected, a planning authority is a competent authority within the meaning of the Regulation 7 of the 2017 Regulations and therefore has a statutory duty to have due regard to the provisions of the Regulations in the exercise of its functions.

- 2.10 The presence of a species protected under European or UK legislation, or under Section 7 of the Environment (Wales) Act 2016 is a material consideration when a planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat and to ensure that the range and population of the species is sustained.

- 2.11 Use of Buildings by Bats

- a) Summer breeding roost
- b) Hibernation roost
- c) Transitional or temporary roost

Roost selection is often closely correlated to suitable foraging habitat within a reasonable commuting distance from the roost and different sites are used depending upon insect densities and abundance, climatic conditions can also affect their ability to successfully forage. All British bats are insectivorous.

****** The term roost is generically referred to as a place that bat/s use for the any of the above reasons, however it should be noted that under the Conservation of Habitats & Species Regulations 2017 (Regulation 43 (d) the term roost is not used but refers to “a *breeding site or resting place of such an animal*” and is afforded legal protection. The roost, breeding site or resting place of bats, which ever terminology is used is legally protected whether or not bats are in occupation.

- 2.12 All wild birds no matter how common, their eggs, young and nests whilst being built or occupied are protected under both the Wildlife and Countryside Act (1981) and Natural Environment and Rural Communities Act (NERC Act 2006). Any work that would damage an occupied nest, eggs or young of breeding birds must be avoided and any damage to nests that may occur as a result of the development should be outside of the main breeding bird season (March-August) as long as it can be conclusively established by a suitably experienced ecologist that the nest/s is/are no longer in use. On occasions nests can become unoccupied during the main breeding season but the status of the nest/s should be determined by a suitably experienced ecologist before any damage takes place.

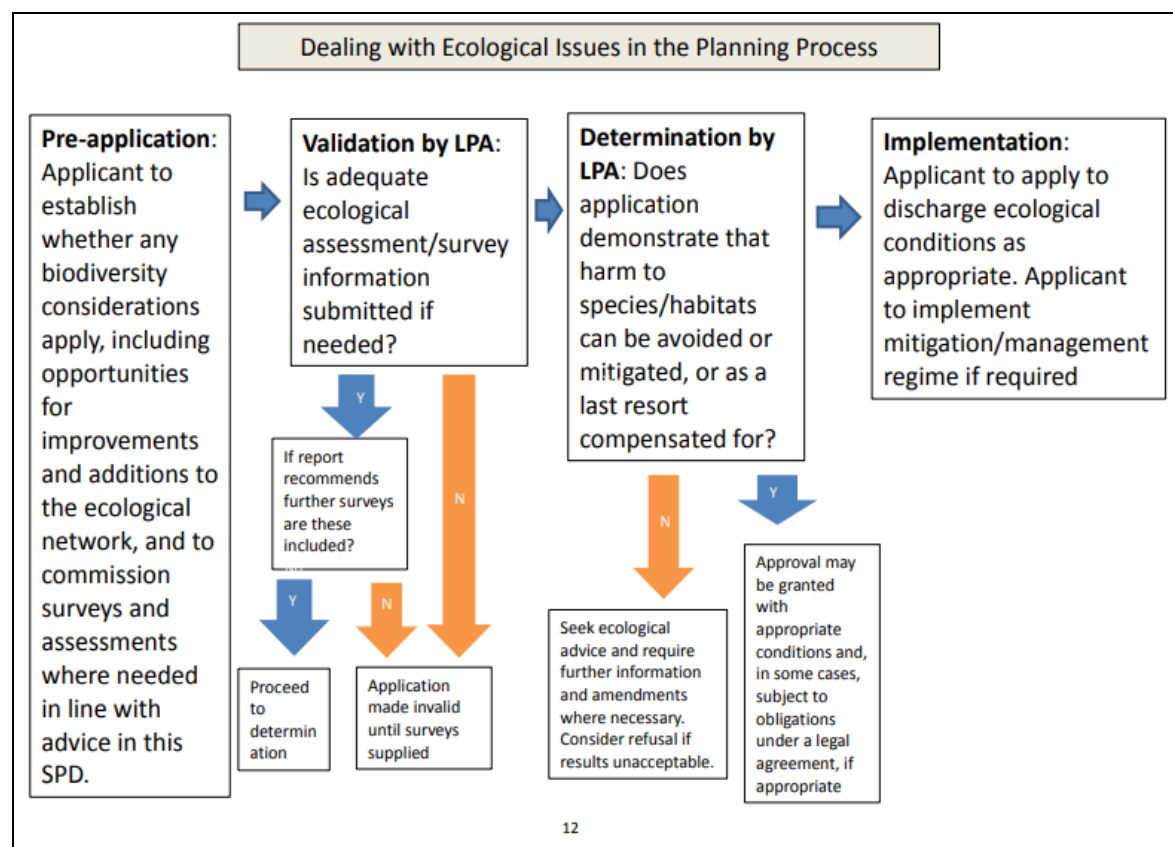


Figure 2: Dealing with ecological issues in the planning process (©Chorley Council et al, 2015)

3.0 Protected Species in Wrexham

- 3.1 Up to eleven bat species have been recorded in Wrexham, many of which use built structures for roosting. A variety of building types and features are utilised by bat species at different times of year ranging from occupied residential dwellings to disused barns and bridges. The most frequently encountered species is the common pipistrelle bat (*Pipistrellus pipistrellus*); its abundant status in Wrexham is mirrored throughout the UK.
- 3.2 The number of breeding Barn owls (*Tyto alba*) within rural parts of Wrexham is moderately high across areas of countryside where suitable environs exist; they are constantly under threat from loss of habitat and nesting opportunities.

4.0 Survey Methods

- 4.1 BCT Bat Conservation Trust 'Bat Surveys: Good Practice Guidelines' 3rd edition (2016) state:-

"The guidance should be interpreted and adapted on a case-by-case basis, according to the expert judgement of those involved. There is no substitute for knowledge and experience in survey planning, methodology and interpretation of findings, and these guidelines are intended to support these. Where examples are given they are descriptive rather than prescriptive."

Desktop Study

- 4.2 Prior to a site visit a desktop study was conducted using online resources to obtain information pertaining to any sites afforded statutory (e.g. SSSI) and non-statutory (e.g. LWS) designations within 2.0km of the site boundary. To do so, the Multi Agency Geographic Information for the Countryside (MAGIC – provided by Defra) was accessed to gather such information; this particular interactive mapping service was also used to locate any locally granted European Protected Species Mitigation Licenses (EPSML) to further inform conclusions concerning such species in the context of the study site and its proposed development.
- 4.3 Satellite imagery was reviewed using sources such as Google Earth (© 2019/20) to determine the nature of adjoining and extending habitats; such information aids in the understanding of how the site might interact with its surroundings ecologically and its value in that context, and how the development may impact at a wider scale.

Field Survey

- 4.4 The daytime survey was conducted on 13th October 2020 when the building to be converted was inspected for potential places that may be of value to bats and to determine if evidence of use was present. An internal investigation into the building was conducted with the employment of high-powered torchlight. Where possible, an external assessment was undertaken whereby external facets were inspected for viable ingress/egress opportunities for loft or crevice-dwelling bats. The building would subsequently be assessed for its suitability for bats in line with the previously mentioned Bat Conservation Trust 'Good Practice Guidelines'
- 4.5 No trees are to be affected under the proposed works.
- 4.6 The criteria for roost assessment is based upon the Bat Conservation Trust 'Bat Surveys: Good Practice Guidelines' 3rd edition (2016) (see Figure 3).

Table 4.1 Guidelines for assessing the potential suitability of proposed development sites for bats, based on the presence of habitat features within the landscape, to be applied using professional judgement.		
Suitability	Description Roosting habitats	Commuting and foraging habitats
Negligible	Negligible habitat features on site likely to be used by roosting bats.	Negligible habitat features on site likely to be used by commuting or foraging bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions ^a and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation ^b). A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential. ^c	Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions ^a and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions ^a and surrounding habitat.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

^a For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance.

^b Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments (Korsten *et al.*, 2015). This phenomenon requires some research in the UK but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in large buildings in highly urbanised environments.

^c This system of categorisation aligns with BS 8596:2015 Surveying for bats in trees and woodland (BSI, 2015).

Figure 3: BCT guidelines extract

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- 4.7 The survey was conducted at a time when bats are now outside of their main active season (May-August inclusive) and entering a transition period prior to hibernation season by the following surveyor:

Table 1: Surveyor credentials

Name	Description
Jonathan Pescod BSc. MRes	Junior Ecologist with three years' experience undertaking a variety of survey types. Mr Pescod is also an accredited agent on the Class 2 Natural Resources Wales bat license of Mrs. K. Wilding (S086297/1).

- 4.8 The UK Guidelines for Accessing and Using Biodiversity Data (CIEEM, 2020) stipulates that *"In some cases, it may be acceptable to not undertake a data search with the LERC or other relevant NSS or local interest groups. For example: ii) Situations where the data search would be extremely unlikely to provide information needed to inform the assessment, due to the scale and location of the proposed development. The appropriateness of excluding a data search will need to be judged on a case-by-case basis as, in most situations, it will be essential to carry out such a search even if the development is very small or is likely to have a low impact. It can be very difficult to demonstrate that a data search would not have provided relevant information without obtaining and reviewing those data"*.

Given the nature of the proposed development and outcomes of the assessment, it has been deemed unnecessary to conduct a data search for protected species or designated sites in the vicinity. Species/habitat information relevant to 4-6 Regent Street, and its immediate environs was obtained at the time of the survey from habitat information; furthermore, taking into consideration the nature of the immediate habitat bat species that are likely to be present can be anticipated.

- 4.9 The results, conclusions and recommendations are based on multiple factors including:
- Practical experience of surveyor
 - Knowledge of bat/bird species relevant to the site location and geographical range
 - Nature of the immediate and surrounding habitat in relation to foraging/hunting opportunities
 - Condition of the building
 - Presence/absence of roost/nesting potential
 - Value of roost/nesting potential – if present
- 4.10 An assessment of the building and developmental footprint in relation to breeding birds was conducted in tandem with the investigation for bats, when birds are outside of their main breeding season (March-August inclusive). Both interior and exterior elevations of the buildings were inspected for historic signs of birds that show a high dependency upon built structures, of which some of these species are in a state of decline. These might include the following:
- **Starling (*Sturnus vulgaris*):** Birds of Conservation Concern (BoCC) red status
 - **House sparrow (*Passer domesticus*):** BoCC red status
 - **House martin (*Delichon urbica*):** BoCC amber status
 - **Swift (*Apus apus*):** BoCC amber status
- 4.11 Additional to the capacity to support common species of bird for breeding purposes, the application site was also subject to an assessment for its ability to support particularly notable species. This includes specially protected species such as Barn owl (*Tyto alba*), protected under Schedule 1 of the Wildlife & Countryside Act (1981) (as amended).

5.0 Limitations

- 5.1 No areas of the roof were visible from ground level due to the built up area the building is located; this has been taken into account in the recommendations provided within this report.
- 5.3 It is considered that there were limitations to the site investigation; however, it is considered that the gathering of information on which to base conclusions and recommendations could still be established.

6.0 Desk Study Results

- 6.1 The proposed development site is located in the centre of Wrexham town, on the pedestrianised eastern end of Regent Street. The immediate habitat consists of the heavily urbanised town-centre, with businesses and access roads surrounding to all directions (Figure 3).
- 6.2 The contiguous landscape to all aspects continues in similarity to that of the immediate, with Wrexham extending in all directions, characterised by a combination of industrial, residential, and retail buildings interspersed with occasional modest parklands and small private gardens, with agricultural fields at the town's borders. The built up areas are intersected by main roads and a dual carriageway, with a network of smaller access roads between. The previously identified habitats that occur in proximity to the survey area can be considered as being of (broadly) low ecological value for the species for which the survey was undertaken (i.e. bats and breeding birds), subject to them being present in the locality. Where good quality habitat is present close to buildings, the percentage use of those buildings by bats/birds increases given that roost/nest opportunities are available and vice versa.



Figure 4: Position of the study site within the contiguous landscape

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- 6.3 One designated site lies within 2.0km of the application site (see Table 2); however, despite 4-6 Regent Street falling within the impact risk zone (IRZ), the prospective development is unlikely to have any direct impact upon it, or its interest features.

Where no impact to Sites of Special Scientific Interest is predicted however, Natural England issues the following advice within their standing advice on SSSI impact zones (NE, 2019): *“It is important to note that the SSSI IRZs only indicate Natural England’s assessment of likely risk to the notified features of SSSIs. Where they indicate such a risk is unlikely, this does not mean that there are no potential impacts on biodiversity or the wider natural environment.”*

- 6.4 An online search of Magic Maps revealed no European Protected Species Mitigation Licences (EPSMLs) within a 2.0km radius of the application site (Figure 5); a search of records held by Tyrer Ecological Consultants Ltd revealed no bat records within 2.0km.

Table 2: Designated sites in proximity to the survey area

Site name	Designation type	Interest features
Gatewen Marsh	Site of Special Scientific Interest	A marshland resting on alluvium deposits, containing a mixture of grassland, marshland, woodland, and flowing water habitats. The site supports a variety of invertebrates including Caddisfly, Beetles and Millipedes.

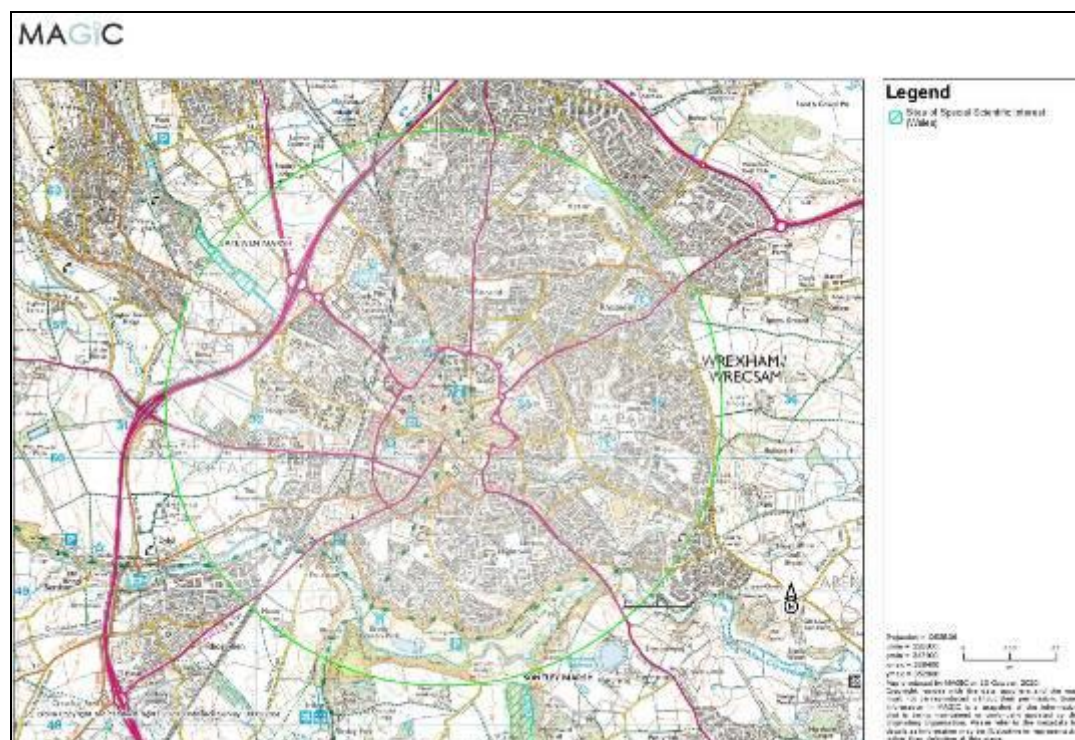


Figure 5: Magic map 2.0km radius search (MAGiC Maps 2020)

7.0 Field Study Results

Bats

- 7.1 The building at 4-6 Regent Street, Wrexham, consists of a three-storey unoccupied former shop and office with a modest yard to the rear. The building is absent of all former function, but appears in reasonably good aesthetic condition despite being disused for a minimum of five years. The building is brick built with a slate-hipped roof on the central three-storey section, with a flat roofed single-storey extension to the front and rear; the entire structure is to the approximate maximum dimensions of 27m x 16m x 20m.
- 7.2 Internally the second floor was found to be absent of a ceiling and as such open to the extensive loft space which follows the full footprint of the central area of the building, to the approximate dimensions of 9m x 16m x 4m. The loft space was found to be cold but draught-free, and fully illuminated by the large windows on the second floor. The space is open with the exception of two chimney stacks and a number of roofing timbers running through, which were found in places to be heavily cobwebbed which may suggest an absence of loft-dwelling bats which would disturb the cobwebs if present. The loft space thus does not meet the breeding requirements of loft-dwelling bat species such as the brown long-eared (*Plecotus auritus*), which is a species that prefers warm, unrestrictive, dark and non-draughty loft spaces which allow free flight and have consistent thermal qualities, however this does not necessarily discount the building for purposes other than breeding, but given the built up urban environment their presence is considered highly unlikely.
- 7.3 Bitumen underfelt is present immediately beneath the roofing slates; where present or similar lining is present beneath roof coverings, the probability of occupancy by crevice-dwelling species of bat such as the Common pipistrelle (*Pipistrellus pipistrellus*) is significantly increased, whereby bats are able to roost between external materials and underfelt, provided external access opportunities exist.

NB: The breeding roosts of Pipistrelle bats are proportionally higher in occupied residential dwellings where the warm, dry conditions favour the requirements of a maternity colony, but other structures are also used, especially for hibernation or by male bats which do not need the same conditions as a maternity colony.

During the investigation, no current or historic evidence of crevice- or loft-dwelling bat species (i.e. droppings or feeding remains) was found anywhere within the building despite a meticulous search. No loft space is present within the single-storey, flat-roofed areas of the building.

- 7.4 Where it could be assessed, the external investigation of the building found it to be generally well sealed and absent of potential roost features (PRF's) with the exception of some damage around the guttering on the north-east corner of the three-storey section, to the rear of the building. It was not possible to determine whether features typically used by bats for ingress or roosting (e.g. cracks and crevices in brickwork, lifted or missing slates) are present within at roof level of the three-storey section of the building due to an absence of visibility from ground level.

Birds

Breeding birds

- 7.5 Due to the aforementioned restrictions in relation to bats, the assessment similarly in respect to breeding birds is also limited. Whilst no evidence of current or historic nesting by birds was identified anywhere within the building, opportunities that favour the nesting habits of various bird species may exist at roof level of 4-6 Regent Street, most notably on top of the roof by the chimney stacks. The presence of nesting birds at the building within the nesting period (March-August inclusive) is thus considered to be possible.
- 7.6 No areas considered to be suitable for the breeding requirements of any Schedule 1 WCA-listed species were identified on site and no evidence of such species was located across the full extent of the survey area.

8.0 Conclusions & Recommendations

- 8.1 Due to the visual access constraints of the roof from ground level, it has not been possible to categorise 4-6 Regent Street in relation to bat roost potential in accordance with Bat Conservation Trust (BCT) Guidelines, therefore, a precautionary approach of Risk Avoidance Measures (RAMs) is recommended in line with the Bat Workers Manual (Mitchell-Jones, 1987), whereby prior to any work being undertaken the presence/absence of bats as far as is possible will be established by a professional ecologist undertaking a detailed investigation into all areas identified at the ecologists discretion as offering roost access or potential once a safe means of access has been provided. Any identified areas to be removed under the proposed works will subsequently be carefully dismantled by the contractor under the supervision of the attending ecologist.
- 8.2 In the event that evidence of bat use is identified, works must stop immediately and a Natural Resources Wales European Protected Species Mitigation Licence (EPSML) sought following further surveys.
- 8.3 Natural Resources Wales provide online information and guidance concerning the requirement for EPSML's and the following extract is included in that guidance:

When would works require a licence?

"A licence is required for anything that would be an offence under the Regulations (covered in section 2.9 of this report). For example, this could include works which would disturb (as defined in the legislation) bats, damage a bat roost, or damage or destroy a breeding site.

NRW can only grant a licence if the following three tests are met:

- 1) The purpose of the work is for preserving public health or public safety or other imperative reasons of over-riding public interest (IROPI) including those of a social or economic nature and beneficial consequences of primary importance for the environment,
- 2) There is no satisfactory alternative,
- 3) The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range; this last test might require that the work is modified to avoid or minimise adverse effects

(mitigation), or that an alternative breeding site/resting place or habitat is provided instead to safeguard the FCS (compensation). Either way, you will need the advice of an ecological consultant. Along with filling in the licence application form, the ecological consultant will need to write a method statement (within the EPSML) explaining how the work will be done to minimise any detrimental effects.

If the consultant ecologist, on the basis of survey information and specialist knowledge of the species concerned, considers that on balance the proposed activity is reasonably unlikely to result in an offence being committed then no licence is required. However, in these circumstances Natural Resources Wales would urge that reasonable precautions be taken to minimise the effect on European protected species should they be found during the course of the activity. If protected species are found, cease the work until you have assessed whether you can proceed without committing an offence.

When might I work without a licence?

There might be situations in which you could continue without a licence. If the work can be organised in such a way that there would be no offences committed (i.e. no damage or destruction of a breeding site/resting place, no capturing, killing or injuring of individuals) then there is no need for a licence. This is a difficult area legally and your ecological consultant will be able to advise you further.

Developers should be aware that if work is held up or modified and there is a possibility that animals will be disturbed, or a breeding site / resting place will be unavailable to them (even if only temporarily), they should apply for a licence in good time.

Example: If a building with a bat roost requires re-roofing or repair work, you would not need a licence if:

- the existing materials are replaced like-for-like (i.e. similar type of roofing slates, similar felt or membrane),
- the same access points are retained and there are no structural changes made to the roost,
- the work is done whilst bats are absent and is completed before they would normally return to the roost.

NB: Where more detailed bat surveys are recommended, following an initial investigation, then Local Authorities on the advice of their ecological advisors, may not determine the application until such time that all relevant information is gathered, i.e. by conducting dusk/dawn surveys. The advice that is provided by the ecological advisors is also in accordance with the obligations placed upon Local Authorities by way of its duties under the Conservation of Habitats & Species Regulations 2017. Therefore it would be prudent to make enquiries to the relevant departmental Planning Officer before submitting a Planning Application that includes an ecological survey report that recommends more detailed surveys.

- 8.4 Whilst no current or historic nests were identified during the survey, suitable bird nesting platforms are considered highly likely to exist at the surveyed site, namely on the roof of the building. Therefore, it is recommended that works are undertaken outside the main nesting season (March-August inclusive), unless it can be conclusively identified by a professional ecologist that nesting birds are absent.

Point 3.24 of the British Standards Publication 42020:2013 defines a professional ecologist as “a *person who has, through relevant education, training or experience, gained recognised qualifications and expertise in the field of ecology and environmental management.*”

- 8.5 To improve opportunities for breeding birds on site, enhancement for nesting birds is recommended to be incorporated into the new development as per Appendix II.
- 8.6 Biodiversity enhancement relative to invertebrates and bats is also recommended within Appendix II.

9.0 Bibliography

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Appendix I: Site Photographs



Plate 1: Front elevation of 4-6 Regent Street



Plate 2: Rear elevation of the building



Plate 3: Internal character of the ground floor



Plate 4: Internal character of the first floor



Plate 5: Internal character of the second floor with exposed loft



Plate 6: Minor damage on the north-east corner of the building at the roof verge

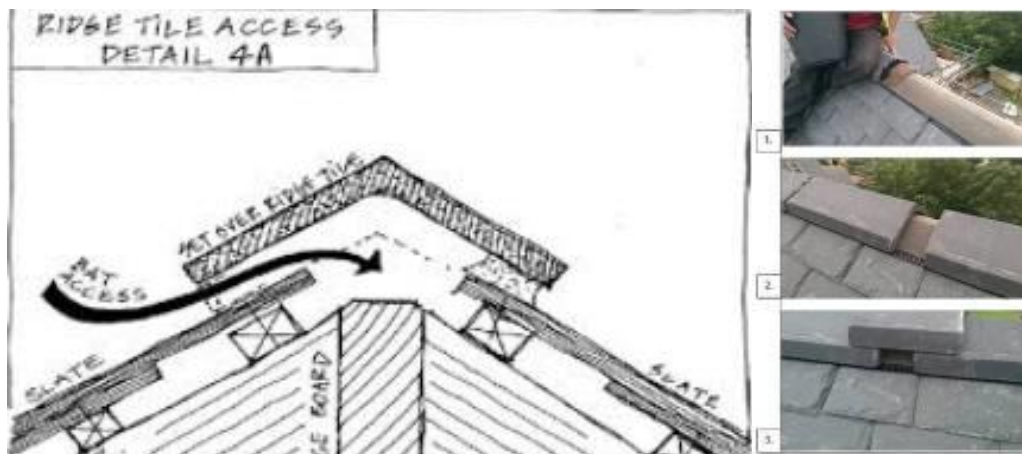
Appendix II: Biodiversity Enhancement

Enhancement

Bats

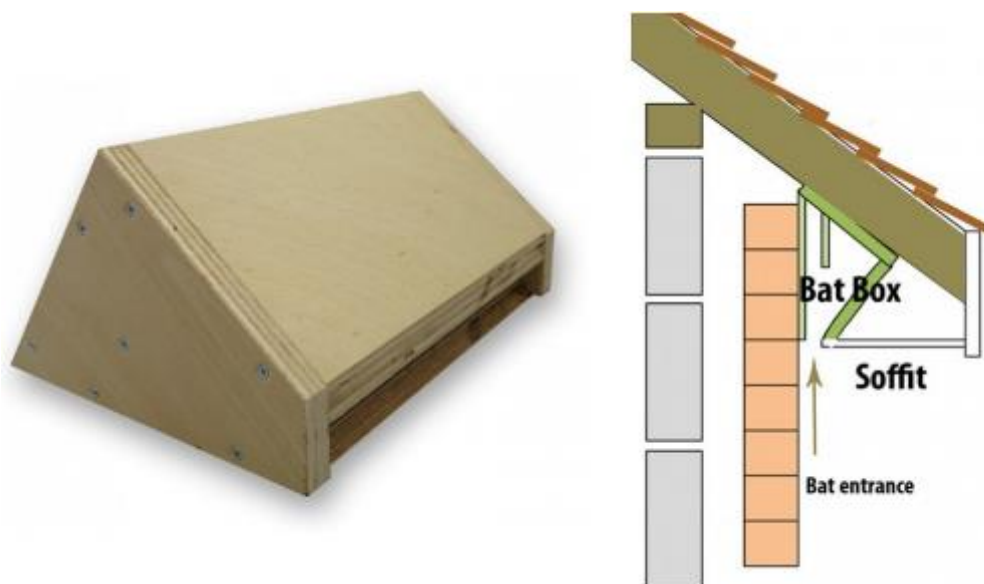
Ridge access

Where appropriated, ridge tile access should be made with the incorporation of traditional Bitumen 1F underfelt immediately beneath ridge tiles. Breathable BRM membrane can cause significant problems where bats are in contact with it, whereby their fine claws become entangled within the fibres of the membrane, entrapping and killing bats.



Soffit access

Where soffits are instated at gable elevations, roost provision may be instated in the form of a soffit bat box with internal roosting space.



Externally fitted boxes

A large number of externally fitted box models for bats exist for buildings and trees. Suitable models for both buildings and trees which may include the Beaumaris, low profile woodstone, or Schewelglar bat boxes.



House sparrow

The 'Sparrow Terrace' has been designed to help redress the balance of falling house sparrow numbers. The current UK population is half what it was in 1980 and this is thought to be due to habitat destruction and lack of suitable nesting spaces. Sparrows are social birds and like to nest in company, therefore, this terrace provides ideal nesting opportunities for three families.

The terrace can be fixed on to the surface of a suitable wall or incorporated into the wall. It is suitable for all types of agricultural buildings such as barns under eaves or overhanging roofs on a North - North East elevation

<http://www.nhbs.com/title/174850/1sp-schwegler-sparrow-terrace>



Swift

The type of entrance possessed by the WoodStone Swift Nest Box is preferred by swifts and discourages competing species such as house sparrows.

This box should be installed at least five metres above ground level, ensuring that there is unobstructed access for birds entering and leaving, preferably being placed in a sheltered locality under eaves or overhanging roofs on a North- North East elevation



<https://www.nhbs.com/woodstone-swift-nest-box>

Invertebrates

Bee and Bug Houses will provide valuable habitat on site for solitary bees and other insects. At a time when many of our native insects are struggling, this is a fantastic way to give them a helping hand. Top chambers can feature wooden nesting tubes in wooden blocks, together with bamboo tubes of various sizes. Alternatively holes can be drilled into existing timber to create novel designs - perfect for attracting ladybirds, earwigs and lacewings. Other chambers can be filled with miscellaneous items such as pine cones to provide nooks and crannies for insects, aiding to provide habitat for insects that predate natural garden pests such as aphids. Natural materials, such as straw or bark, will provide an excellent winter habitat for lacewings, ladybirds, woodlice, earwigs and many other bugs. A range of other novel ideas can be used.

For example, see link - www.nhbs.com/bee-and-bug-biome

