



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:	Conversion of Former Public House and outbuilding into dwellings at Oak Tree Inn
Method Statement Version Number:	1
Method Statement Issue Date:	11/11/2019
Site Address:	Oak Tree Inn, Ruabon Road, Acton, Wrexham LL13 7PL

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

The site of

- Oak Tree Inn, Ruabon Road, Acton, Wrexham LL13 7PL

Has been granted full planning permission for

- [The] Conversion of Former Public House And Associated Flat Into 3 No. Two-Storey Dwellings
And Conversion And Extension Of Outbuilding To Form 3 No. New Detached Dwellings

[Wrexham County Borough Council, P/2019/0348].

Ecological surveys of the site were completed by Pearce Environment Ltd:

- Preliminary ecological appraisal survey (PEA) on 27th March 2019
- Phase 2 bat surveys completed between May and July 2019.

These surveys confirmed the presence of:

- A transitional roost with one (1) common pipistrelle under a tile on the western elevation of B3;
- A transitional roost with one (1) BLE in the eastern half of B3.

In one of the outbuildings on site, designated as B3.

The common pipistrelle brown long-eared bat roosts will be destroyed when building B3 is converted and extended into dwellings for the proposed development.

B Introduction

B.1 Background to activity/development

Include a brief summary of what the proposed activity is and why it is necessary.

The conversion and extension of the existing outbuilding (B3), which will destroy transitional roosts used by a maximum of 1 common pipistrelle and 1 brown long-eared bat.

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

Please ensure sufficient detail is provided on the proposed works e.g. barn/loft conversion to new dwelling, demolition of buildings, re-pointing of bridges and tunnels, lime kilns etc. Include the current status of planning permission or other consents (if applicable) and any outstanding conditions/reserved matters. Include timescales and order of work.

The proposed works has been granted full planning permission for:

[The] conversion of former public house and associated flat into 3 no. two-storey dwellings and conversion and extension of outbuilding to form 3 no. new detached dwellings [Wrexham County Borough Council, P/2019/0348].

The current timescale for this is:

Project Start date 25/10/19 end date 20/08/20

Site clearance, including Inn 25/10/19 -10/11/19

Barn clearance 05/11/19-15/11/19

First fix barn and pub 15/11/19 – 15/02/20

Extension of barn 15/12/19-20/04/20

Second fix barn and pub 15/01/20 – 20/06/20

B.3 Actions requiring licensing,

Eg disturb, capture, damage or destroy breeding site or resting place. Briefly explain why these actions are necessary.

The destruction of resting sites of 1x common pipistrelle and 1x brown long eared bats for the proposed development.

C Survey and site assessment

C.1 Existing information on the bat species at the survey site.

Provide records from local environmental records centres, local bat groups, and previous survey work by the applicant or others. Include records from within 2km (or a larger area depending on the scale of the scheme & the species involved - see Bat Survey Guidelines 3rd Ed)

The previous survey work on site concluded transitional roosts of:

- Common pipistrelle (*Pipistrellus pipistrellus*)
- Brown long-eared bat (*Plecotus auritus*)

A COFNOD database search of a 1km radius surrounding the site, from the previous ecology surveys in 2019 returned the following bat species:

- Soprano pipistrelle (*Pipistrellus pygmaeus*)
- Common pipistrelle (*Pipistrellus pipistrellus*)
- Noctule (*Nyctalus noctula*)
- Brown long-eared bat (*Plecotus auritus*)
- Myotis bat species (*Myotis* spp.).

Eleven records for these five bat species were returned within 1km of the site, the nearest of which originate ~0.33km northwest of the site and records date from as recently as 2016.

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

The following statutory sites SSSIs or SACs within 10km of the site were checked for bat notifications where possible on magic.defra.gov.uk, and None had any bat notifications.

River Dee (England) SSSI

Dee Cliffs, Farndon SSSI

River Dee and Bala Lake SAC

None of the following sites could be checked due to a lack of information on magic.defra.gov.uk, although many are thought to be of geological interest only.

Afon Dyfrdwy (river dee) SSSI

Chwarel Singret SSSI

Cloy Brook Pastures SSSI

Gatewen Marsh SSSI

Llay Bog SSSI

Sontley Marsh SSSI

Coedwig Ffossil Brymbo Fossil Forest SSSI

Marford Quarry SSSI

Stryt Las A'r Hafod SSSI

Nant-y-belan and Prynela Woods SSSI

Vicarage Moss SSSI

Coed Talon Marsh SSSI

Ruabon/Llantysilio Mountains And Minera SSSI

Johnstown Newt Sites Sac SSSI

Berwyn a Mynyddoedd De Clwyd / Berwyn And South Clwyd Mountains Sac SSSI

C.3 Objectives of the survey.

E.g. to determine presence/absence of bats, bat usage of site (e.g. maternity, hibernation, night roosts; foraging, commuting, swarming sites).

The previous ecological surveys on site aimed to determine the presence/absence of bats, and to characterise the bat usage of site including species and numbers, and the type of roost(s) if present.

C.4 Scaled plan/map of survey area

This should be of appropriate scale and orientation with integral or separate location map at 1:50,000 or 1:25,000 scale and aerial photographs.

Included in the application as separate figures C.4.1 (site) and C.4.2 (landscape).

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

This should be based on daytime visits (to include description of roost and habitat relevant to bat commuting/foraging behaviour). Include annotated photographs if applicable and aerial photographs if available (to show habitat connectivity).

Built Structure(s)

The site contains four (4) built structures, summarised below:

- B1 – The Oak Tree Inn – a public house (currently in use) adjoined to a dwelling, set upon hardstanding and constituting the northern portion of the site, at SJ 33116 49686



- B2 – A small outbuilding associated with B1, set upon hardstanding within the central portion of the site, at SJ 33128 49680



- B3 – A large outbuilding located to the rear of the existing carpark, set upon hardstanding in the southeast portion of the site, at SJ 33143 49670



- B4 – A block of timber-built sheds set upon hardstanding along the western site boundary, at SJ 33121 49659



Of these four buildings, only B3 has bat habitat value and is described further:

B3 (large outbuilding)

- B3 (SJ 33143 49670; Image 3.25; Image 3.26) is a large, two-storey outbuilding – possibly a former coach house. B3 is constructed from brick throughout, with a timber truss and a combined of a pitched/ hipped roof with slate tiles. A corrugated lean-to appears to adjoin to the southern aspect (off-site).
- Externally, B3 is in good condition overall. The brickwork and roof are tight throughout. No potential bat roost features were noted on the exterior of B3 during the PRA.
- Internally, B3 is in good condition overall. The first-floor level is split into four approximate sections via internal partition walls – open door/ window frames within two (2) of the partition walls potentially allows free movement between the two (2) eastern-most sections and between the two (2) western-most sections (Image 3.27; Image 3.28). The timber truss is in good condition and the roof is lined with bitumastic felt (Image 3.29). A small number of potential bat roost features and ingress/ egress points were noted within the interior of B1 during the PRA, and are evaluated below:
 - Several sags within the bitumastic felt lining within the roof of B3;
 - Three (3) open window frames on the northern and southern elevations of B3 allow potential access into all sections of this building, along with a significant gap above a shutter (Image 3.30).

Image 3.25 Western elevation of B3



Image 3.26 Northern elevation of B3



Image 3.27 A typical view within the first-floor level of B3



Image 3.28 A typical view within the first-floor level of B3 – showing partition wall with open gap



Image 3.29 Bitumastic felt roof lining within B3, with occasional sags noted



Image 3.30 Gap above a shutter on the first-floor level of B3 presenting a potential access opportunity



Limited evidence of bat ingress was found within [B3] during the PRA, summarised below:

- Approximately twelve (~12) scattered bat droppings around the western half of the first floor of B3, mostly 2+ seasons old, and commensurate with those of brown long-eared and pipistrelle species – given the open nature of this building, these could be attributed to foraging behaviour
- [B3] is considered to offer overall 'low' bat roosting potential for roof-void dwelling bat species, but is not deemed to offer hibernation opportunities.

Foraging/ Commuting

- The site itself offers average potential foraging and commuting habitat for a common assemblage of bat species, given the presence of grassland and potential indoor foraging areas, but owing to the lack of trees and/ or significant vegetative features.
- It was mentioned by the pub landlord during the survey that he has seen bats flying around the site (verb. comms., 27/03/2019).

C.6 Field survey(s).

Include survey method (emergence counts, dawn surveys, site inspections), timings (day/evening), weather conditions (wind, rain, temperature – tabulated for multiple survey visits), personnel involved (provide individual licence numbers, if held) and details of experience/competence in this type of work, and equipment used (type of bat detectors and logging equipment). Also include any constraints and justifications for departures from best practice.

Method

Three (3) Phase 2 bat activity surveys (emergence and re-entry counts) were undertaken by Pearce Environmental Ltd. on B3 (large outbuilding) – deemed to offer 'low' bat roosting potential during the PRA.

Timings (day/evening),

2nd May 2019 – Emergence Survey (dusk)

23rd May 2019 – Emergence Survey (dusk)

2nd July 2019 – Emergence Survey (dusk)

Weather conditions (wind, rain, temperature – tabulated for multiple survey visits),

Table 2.2 Climatic conditions and timings of detailed bat activity survey(s)

Date	Start/ Finish Time	Sunset/ Sunrise	Cloud coverage (%)	Wind (mph)	Temperature (°C) Start/ Finish
02/05/2019	20:25 / 21:50	20:42	50	0	12/ 10
23/05/2019	21:00 / 22:35	21:12	15	1	16/ 14
02/07/2019	03:15 / 05:05	04:51	15	1	12/ 12

Personnel involved (provide individual licence numbers, if held)

- A minimum of two (2) experienced bat surveyors were present during each survey to ensure complete visual coverage of the building(s), as illustrated in Appendix 7:

- Jonathan Molesworth BSc (Hons) Grad CIEEM.

- Ben Jones BSc (hons) MSc, who has 4 years' experience conducting environmental appraisals and holds a degree in Marine and Freshwater Biology, a Master's degree in 'Managing the Environment' and NE/ NRW licenses for bats (licence numbers: 2017-29112-CLS-CLS and 76324:OTH:CSAB:2017) and great crested newt (licence numbers: 2016-25209-CLS-CLS and 78716:OTH:SA:2018).

- Charlotte Pearce, an experienced surveyor with over 5 years' experience, and holder of a NE class licence for great crested newt.

- Phil Playford BSc (Hons) Grad CIEEM, a conservation worker with over 7 years' experience in undertaking surveys for protected species, who holds a first-class degree in Physical Geography and Applied Environmental Science from Keele University and volunteer for the Cheshire and Warwickshire Wildlife Trusts.

equipment used (type of bat detectors and logging equipment).

canon XA20 video camera with infrared capability was utilised, as required, to aid surveyors in identifying bat roost location(s).

- Surveyors were equipped with Echo Meter Touch 2 bat detectors and recorded observations of the time, location and activity of all bats seen or heard. A static bat detector (Anabat Express) was deployed, as appropriate, to provide digital recordings to further record and aid with species identification using AnalookW (version 4.2n).

- Bats were identified on the basis of their characteristic echolocation calls using the relevant computer sonogram analysis software with reference to published bat call parameter data⁶. Species of *Myotis* (*Myotis* spp.) and long-eared bats (*Plecotus* spp.), where recorded, were identified to the genus level on the basis of the inherent difficulty in distinguishing between species solely from their echolocation calls.

constraints and justifications for departures from best practice.

Phase 2 bat activity survey(s) were undertaken during the bat active season (May – August inclusive). No significant change in the conditions/ habitats on the site were noted during bat activity surveys; therefore, the survey(s) are not considered to have been limited by seasonal or

climatic factors. Although no dawn survey was undertaken, this is not thought to affect the survey results significantly.

C.7 Survey Results.

Summarise findings in table form (if appropriate); provide clear, annotated and cross-referenced maps/plans/photographs to show roost locations, flight lines, access points, dimensions of existing roosts etc.). Raw data must be appended, including samples of sonograms, results of DNA analysis of droppings.

2nd May 2019 – Emergence Survey

The first bat pass was observed at 21:06 hrs (24 minutes after sunset); a common pipistrelle which flew from south of the site and briefly foraged around an adjacent walled garden.

- One (1) common pipistrelle emerged from underneath a tile on the hipped roof on the western elevation of B3, where the hip joins the ridge, at 21:18 (Image 3.32). No further bat emergences were recorded.

Image 3.32 Pipistrelle roosting location (indicated in red)



Occasional foraging and commuting bat activity ensued throughout the survey – all from common pipistrelles – mostly foraging to the south/ west of the site (over adjacent gardens) and commuting across the car park, along the northern aspect of B3.

- Brown long-eared bat(s) were recorded briefly echolocating at 21:04, 21:16, 21:18 and 21:28; however, none were visualised.

23rd May 2019 – Emergence Survey

The first bat pass was observed at 21:27 hrs (15 minutes after sunset); a common pipistrelle which emerged from underneath a tile on the hipped roof on the western elevation of B3 (Image 3.32).

- A single brown long-eared bat (BLE) emerged from B3 at 21:42, which flew out of the eastern-most open window on the northern elevation – this individual flew back inside and then immediately flew out again before commuting to the west (Image 3.33).

Image 3.33 Open window on the northern elevation of B3, from which a BLE emerged (indicated)



Regular foraging and commuting bat activity ensued throughout the remainder of the survey:

- Regular common and soprano pipistrelle foraging/ commuting activity around the site and to/ from adjoining gardens/ properties (particularly to the east and west);
- Noctule commuting and foraging activity high over the site

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2nd July 2019 – Emergence Survey

- The first bat pass was observed at 03:20 hrs (1 hr 31 minutes before sunrise); a common pipistrelle which was foraging along the northern elevation of B3.
- No further bat activity of any kind was observed throughout the remainder of the survey and no bats were observed re-entering B3.

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

Provide count/estimate of bat numbers, status of site (e.g. hibernation, maternity or feeding roost, swarming site etc), roost significance, constraints on survey (e.g. time of year, cold weather, access problems – justify as necessary).

Bats

- The presence of low numbers of common species of bat is confirmed roosting within B3 (large outbuilding) following Phase 2 bat activity surveys:

- A transitional roost with one (1) common pipistrelle under a tile on the western elevation of B3;
- A transitional roost with one (1) BLE in the eastern half of B3.

- B1 (Oak Tree Inn), B2 (small outbuilding) and B4 (timber sheds) are all considered to provide 'negligible' bat roosting potential.

- The site itself offers average commuting and foraging habitat for common bat species – supported by observations made during Phase 2 bat activity surveys.

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

E.g. noise, vibration, dust, lighting, access, or obstruction due to scaffolding and plastic sheeting.

N/A The roosts will be destroyed when the building (B3) is renovated and extended into dwellings.

D.2 Long-term impacts: roost modification

E.g. new entrances (including human access e.g. for servicing/maintenance), change in size of roost space, changes in airflow etc., temperature, and humidity. Note that impacts can be positive or negative as this is in absence of mitigation.

N/A The roosts will be destroyed when the building (B3) is renovated and extended into dwellings.

D.3 Long-term impacts: roost loss.

Impact on different species populations to be taken into account at local, regional, and national level.

The roosts will be destroyed when the building (B3) is renovated and extended into dwellings.

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

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

E.g. loss of linear features such as hedges, tree lines, increased lighting, severance of flight lines by roads/rail lines.

No loss of linear features is to occur during the development.

D.5 Post-development interference impacts.

E.g. extra street lighting, use of loft space as storage.

Extra lighting during the use of the site could impact on bat use of the site for roosting or commuting if left unmitigated.

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

Include a scaled plan/s showing location and extent of vegetation to be cleared in the context of the current site, results of the survey information, bat exit points and flight routes etc

Transitional roosts impacted only at a site level. There are no impacts on the county or regional scale.
No vegetation to be cleared aside from beer garden.

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).

Timings, effort, methods to be employed, care of bats, release sites etc. Include diagrams to show capture/exclusion apparatus if non-standard techniques are proposed. The method statement should also include contingency plans for dealing with any bats found during the course of the works.

The site ecologist will supervise the soft strip of the tiled roof areas, and any internal timbers. If bats are encountered, the ecologist will capture bats by hand and transfer them to the safety of boxes on a retained tree (see below). Handling and release will be in accordance with good practice as set out in the Bat Workers Manual.

E.2 Bat roosts and habitat

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

Provide details of all re-roofing works for example, replacement of tile type, specification of roofing membrane, use of insect guards, timber treatment; also include addition or changes in insulation and any impact on temperature/humidity. Explain how roost entrances will be retained and if purpose built entrances are required a scaled drawing of their design is required. Any enhancements to the roosts such as crevice provision should also be detailed.

No roosts retained in-situ.

E.2.2 Modification of existing roost(s)

Include dimension details, scale drawings of the roost and access points, orientation. State which services will be incorporated in the roost that might require regular servicing, for example, lift winding gear, electrical or plumbing services, gas boilers; partitioning of voids where a large property is being converted to a number of units, etc..

No roosts modified.

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

Include dimension details including access points, location details, materials to be used e.g., timber, sarking felt, etc., aspect, justify variation from the original roost. Diagrams of widely available standard bat box designs are not required; just refer to bat box name and reference number, e.g., FF 1 Schwegler.

The transitional common pipistrelle and brown long eared roosts will be relocated into boxes installed on retained tree in the southern corner of the site before the commencement of works, to act as temporary roosts.

- Schwegler 2F bat box
- Schwegler improved cavity bat box

These will be 3-5m high on the south or south-western side, with clear flight paths to the entrances. Pruning may be required to accommodate this.

In addition, 2x integrated 1FR box bat tubes will be built into the south-western elevation wall of the renovated/extended B3 during the works, to act as new permeant provision.

Once the works are complete on the buildings, then the bat boxes on the tree will be moved under the supervision of an ecologist (after checking for presence) to be affixed to the walls of the new buildings on site, on the south-eastern or south-western elevations with clear flight paths.

No voids are required for brown long eared, as there was no evidence of a maternity roost.

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

Include details of measures to ensure that existing bat habitat (e.g. vegetation features close to roosts and/or used as flightlines; foraging habitat) will be retained and not damaged during construction. For new or modified habitat, specify design, habitat type, planting schemes & locations, provenance of imported plants, consideration of biosecurity impacts.

No external habitat is impacted

E.2.5 Scaled maps/plans

To show proposals/mitigation outlined above in relation to existing and proposed habitat features. A GIS data layer may be included with your application to illustrate locations of roosts and features in E.2.1 to E.2.3.

Included in application as as figures E.2.1 (existing site roosts) and E.2.3 (proposed site measures)

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

Include measures to ensure compliance with this method statement

The supervision for the work will be arranged immediately with the client on receipt of bat licence.

E.4 Mitigation contingencies

Describe any contingency proposals including circumstances when the contingencies will be instigated.

If different species or substantially more bats are discovered during the works, all development will stop and the ecologist consulted for further advice, which may include a licence modification.

E.5 Biosecurity risk assessment

Consider presence of non-native species and disease on site and actions to be undertaken that will prevent their spread onto or off the site

No known biosecurity risks for the development. No invasive plants were recorded in the previous preliminary ecological appraisal from 2019.

F Post-development site safeguard

F.1 Habitat/site management and maintenance

Include ongoing land management proposals, details of who will be responsible for management and maintenance, on going running costs, site/structure ownership and monitoring development of new habitats.

The client retains responsibility for the ongoing management of the site.

F.2 Population monitoring, roost usage etc.

Include details of monitoring effort, timing, personnel involved and equipment to be used.

No monitoring required for the non-maternity roost, of low conservation value.

F.3 Post-development mitigation contingencies

Describe the action that you will take if monitoring results are unfavourable.

No monitoring required for the non-maternity roost, of low conservation value.

The Applicant has agreed to maintain the bat boxes and that they understand that the provision and maintenance of replacement roosts is an important requirement of the licence.

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

As appropriate e.g. Section 106 Agreement, to include details of who will undertake the work and reporting details, other covenants, contractual agreements or wardening schemes.

N/A

G Timetable of works.

Include timings of exclusion operations, demolition and construction works, creation of mitigation measures, timing of other post development works and monitoring.

Project Start October 2019

Installation of bat boxes on a retained tree on site pre-development – November 2019

Pre-Inspection works by the ecologist or accredited agent – November 2019

Capture exercise by soft strip of roof tiles and internal works November – December 2019

Extension of the outbuilding, with the installation of Schwegler 1FR bat tube wall boxes in the south-western elevation at 3-5m high.

Movement of bat boxes from tree onto a permanent building on site i.e the former inn, on the south-eastern or south-western elevation under ecological supervision – July 2020

Removal of tree to form new landscaping area – July 2020

Project end August 2020

H Land Ownership – Mitigation Site

H.1 Mitigation Site/Compensation Site Ownership

If mitigation is to be undertaken at a location not owned by the applicant, you must provide the written consent of the relevant land owner(s). You must also provide details of how the mitigation is to be maintained in the long term (e.g. a legal agreement).

N/A

H.2 Mitigation Site/Compensation Ownership post construction

If the ownership of the mitigation site will change after construction please confirm the identity of the prospective owners/occupiers together with timescales associated with transfer of occupancy or other forms of legal interest. You must also provide details of how the mitigation is to be maintained in the long term (e.g. a legal agreement)

N/A

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		Date	11/11/2019
<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>			X
Full name in BLOCK LETTERS	MR BRIAN WAUDBY		
Signature of the Ecologist		Date	11/11/2019
<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>			X
Full name in BLOCK LETTERS	MR CHRIS FORMAGGIA		

J References

Credits for source information.

K Annexes

K.1 Pre-existing survey reports (attached separately)

K.2 Raw survey data (see previous preliminary ecological appraisal/phase 2 bat survey report by Pearce Environment Ltd).