



Formby Business Centre, 42 Duke Street, Formby, Merseyside, L37 4AT

www.facebook.com/ecologicalsurvey
www.linkedin.com/company/tyrer-ecological-consultants-ltd

Tel: 01704 875781

Email: kylee@tyrer-ecologicalconsultants.co.uk
enquiries@tyrer-ecologicalconsultants.co.uk

VAT REGISTRATION NO: 290 0603 30

Date: 12/12/2019

Site: Mill Cottage, Marchwiell Hall, Wrexham, LL13 0SS

National Grid Reference: SJ 34060 48269

Re: Letter in Respect to Proposed Mitigation at Mill Cottage

In reference to the report submitted on 22nd August 2019 by Tyrer Ecological Consultants in respect to bats which also incorporates indicative mitigation, the following information is provided to ensure clarity relating to bat roost provision.

Wrexham Council with their validation requirements have provided the following comments in respect to ecology:

Ecology: *The survey results demonstrate that the Mill complex is of high importance for bats. In these circumstances it would be preferable to keep the areas used for roosting in the building and draw up a scheme of renovation which incorporates these areas, without disturbance. Creation of separate mitigation roosts should be a last resort, as such the applicant must properly demonstrate that the mitigation hierarchy has been followed and give clear reasoning for this. Should a separate roost be required, it must be for the sole use of bats and not as dual use for vehicles. It must be shown to have the same thermal properties as the existing roost and be in position, prior to work commencing on the building.*

At this time it must be reiterated, as also specified within the submitted report that: "...as proposed site plan / elevation drawings are not yet available, the following mitigation proposals are indicative only".

In order to address the comment by WBC I refer to section 10.14 with the Tyrer Ecological Consultants report which specifies that: "Soffit and barge access shall be re-instated across areas currently used by Pipistrelle, Whiskered/Brandt's and Brown long-eared bats and will allow access back into the existing loft voids at Mill cottage".

This will thus address concerns in relation to a separate stand-alone roost as the areas currently used by bats will be retained and available to use during future breeding seasons. It is appreciated however, that due to the condition of Mill Cottage it is understood that a significant level of work will be required to restore the structure to a habitable condition and invariably disturbance to these features will be incurred. However, all work will be subject to a NRW development license and will be timed outside of the breeding season to avoid disturbance at a sensitive time of year. The timings and procedure will subsequently be outlined with a license application and method statement when plans/elevations drawings have been provided / finalised.

The stand-alone feature which will be utilised as a garage will contain a loft space; the loft area will be dedicated for bats and for no other purpose such as storage; access will not be permitted into this area unless under direction from a licensed bat ecologist. This feature is purely aimed at providing an area for the Lesser Horseshoe bat to replication the same purpose that the current dilapidated outbuilding is providing at the site, i.e. a day roost.

Use of the ground floor for vehicles will not impact upon the loft space above as it will be a sealed unit from the area beneath; furthermore, the current outbuilding is not heated or currently being used as a maternity roost and therefore, the loft area above the garage will not require a heat source as its aim is to provide a like for like provision (i.e. day roost) following the loss of the outbuilding.

The additional provision and information provided within the report was as specified as being indicative as at the time of issue site plans / elevation drawings were not available. In respect to cladding to the gable elevation, this feature has been recommended purely as an enhancement for bats to use as alternative roost provision should this be acceptable by the client. Measurements included within the indicative mitigation have been based upon an average size garage and are not reflective of the dimensions that would be required by a single Lesser Horseshoe bat as a day roost – it is understood the proposed garage will be of smaller scale, approximately 5.5 metres x 4.5 metres x 3 metres (L x W x H) which is more than adequate for this purpose. Traditional 1FE roofing felt will need to be installed as opposed to a breathable membrane as specified with the submitted report.

Access for Lesser Horseshoe bats will need to be provided into the loft area above the garage as specified within the submitted report (figure 9); in addition this an internal baffle would also be of benefit to ensure the loft area is not accessed by birds such as pigeons (see indicative design below):



Kind regards

Kylee Wilding

Director
Tyrer Ecological Consultants Ltd

T: 01704 875781 | E: enquiries@tyrer-ecologicalconsultants.co.uk | W: www.tyrer-ecologicalconsultants.co.uk

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