



BAT ACTIVITY REPORT

4 BROOK STREET, WREXHAM

LINGAR HOMES

12 AUGUST 2019

Sambrook Associates Ltd

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This report has been prepared by Sambrook Associates Ltd on behalf of Lingar Homes in connection with a proposed development at 4 Brook Street, Wrexham, and takes into account their particular instructions and requirements. It is not intended for, and should not be relied on, by any third party and no responsibility is undertaken to any third party.

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1 INTRODUCTION

1.1 Background Information

- 1.1.1 Sambrook Associates Ltd was instructed in September 2018, by Lingar Homes to undertake bat activity surveys, in relation to the proposed conversion the upper floors of a building into flats at 4 Brook Street, Wrexham.
- 1.1.2 This survey and report follows a preliminary roost inspection undertaken by Arbtech earlier in 2018. Arbtech did not find any evidence that the building is being used by bats but they did find a few features that may provide potential roosting features for individuals or small numbers of bats. Features included broken/raised slates on the roof. Their report recommended that a single activity survey should be conducted.
- 1.1.3 This report provides the results of two bat activity surveys, the first was undertaken late in the season and so a second was undertaken in June 2019; an appraisal of the results is also provided.

1.2 Site Description

- 1.2.1 The Site is located within the centre of Wrexham town centre, in a heavily built up area. Street lighting and vehicular traffic are present throughout the night. A full description of the building, including photographs can be found in the Arbtech report.
- 1.2.2 The proposed development is hereby referred to as the Site and comprises the land within the red-line boundary.

2 LEGISLATION AND PLANNING POLICY

- 2.1.1 Many sites, animals and plants are protected by European and/or UK legislation either because of their decline across Europe and the UK or due to the persecution they have placed upon them by negligent or illegal acts such as baiting or trade. Legislation is also in place to prevent the spread of introduced or non-native invasive species and harmful weeds. When undertaking an appraisal of a proposed development, such legislation is taken into account as follows.
- **European:** Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive'); and Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds (codified version of Directive 79/409/EEC as amended) (the 'Birds Directive').
 - **UK (England & Wales):** • The Conservation of Habitats and Species Regulations 2010, as amended (the 'Habitat Regulations') which transposes the Habitats Directive in UK law; The Wildlife and Countryside Act 1981 (as amended); the Countryside and Rights of Way Act (CRoW) 2000; the Protection of Badgers Act 1992; the Natural Environment and Rural Communities Act (NERC) (2006) and the Environmental Protection Act (EPA) 1990.
- 2.1.2 Species such as bats, great crested newts, otter, water vole, birds, reptiles and badgers are all protected to varying degrees under this legislation.
- 2.1.3 In addition to legislation, there are also national and local planning policies pertaining to the protection of biodiversity. The National Planning Policy Framework (Department for Communities and Local Government, 2012) states that local planning authorities should "promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan."
- 2.1.4 Under the NERC Act, local authorities (and other public bodies) have a duty to conserve biodiversity the local authority must take the protection of the priority habitat into consideration when it is making a planning decision.

3 METHODOLOGY

3.1 Introduction

- 3.1.1 A bat activity survey was conducted in September 2018 and a follow up survey conducted in June 2019. The surveys followed the methodology set out in the Bat Conservation Trust Handbook *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (Collins, 2016).
- 3.1.2 The first survey was undertaken at dawn on the 25 September 2018 and commenced 1.5 hours before sunrise until 15 minutes after. The second survey was undertaken at dusk on the 05 June 2019 and commenced 15 minutes before sunset until 2 hours after.
- 3.1.3 All of the surveyors are experienced in bat activity surveys; Rebecca Sambrook BSc (Hons) MCIEEM (lead surveyor), Jack Halpin BSc (Hons), Mark Benson and Tim Green. Three surveyors were positioned strategically so that good coverage of the building was achieved; one to the front on Brook Street (JH), one to the side on Bridge Street (TG) and one to the rear within the Site compound (RS/MB). The lead surveyor, Rebecca is a Full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and adheres to that organisation's Code of Professional Conduct. Rebecca has been designing and conducting bat surveys, assessing impacts and designing appropriate mitigation for over 16 years, involving hundreds of projects.
- 3.1.4 The surveyors each used a Wildlife Acoustics' EM Touch detector.
- 3.1.5 The following table provides details of the surveys.

Table 3.1: Survey Data

Date	Sunrise/Sunset	Time started	Time completed	Temperature during survey	Weather conditions
25/09/2018	07:02	05:30	07:17	6-9°	Dry, cool, still. Previous dusk temperature - 12°
05/06/2019	21:34	21:19	23:34	10-12°	Warm, clear, still

3.2 Limitations

- 3.2.1 The temperatures during the 2018 survey were slightly lower than anticipated.

4 RESULTS

4.1 Introduction

- 4.1.1 This section provides a commentary on the data collected during the activity surveys undertaken in 2018/19.
- 4.1.2 No bats were recorded during either of the surveys and none were seen to enter into or emerge from the building.

4.2 Appraisal of Potential Effects

- 4.2.1 Overall, the Site offers limited potential for bats. Although the building offers some potential roosting features, the location of the building is suboptimal, being in the centre of a large, busy town and although urban locations do not preclude the potential for bats, their suitability is generally somewhat reduced. The building is brightly lit by street lighting throughout the night which is not generally conducive to roosting bats. Part of the back of the building is in shadows but the area adjacent to this part is also brightly lit which would preclude many light-avoiding bat species.
- 4.2.2 Given the location of the building and the fact it is lit, it is considered that the results obtained are a true reflection of the status of bats at this site.
- 4.2.3 Effects on bats during the course of construction are not anticipated. However, as a highly precautionary approach, it is recommended that initial tile removal is undertaken by hand and if in the unlikely event a bat is found, work must stop immediately, and an appropriately experienced ecologist contacted for advice.
- 4.2.4 The addition of low-level lighting (where required for health and safety reasons during occupancy) will not give rise to a significant increase in potential for effects on bats, due to the existing street lighting.

5 CONCLUSION AND RECOMMENDATIONS

- 5.1.1 The Site has been the subject of surveys and assessment in 2018/19 which have revealed that the Site is generally of low value to bats, with no bats recorded around the building during the activity surveys.
- 5.1.2 It is considered that the proposed building work is highly unlikely to affect bats and so can be undertaken without the need for further survey or detailed mitigation.
- 5.1.3 Developers, site contractors, their agents, directors and other personnel are reminded that bats and their habitats are protected by law, and to kill, injure or harm such species and their habitats is a criminal offence. Custodial sentences and/or large financial penalties are expected if you break the law.
- 5.1.1 Therefore, as a highly precautionary approach, the following is recommended:
- **Recommendation:** The removal of the existing roof (if required) is to commence outside of the two most vulnerable periods; breeding (late April to September) and hibernation (November to February), initial slates are to be stripped by hand. If a bat is discovered, work must stop immediately and an appropriately qualified ecologist contacted for advice.
 - **Reason:** to avoid the potential for impacts on roosting bats, although it is highly unlikely they are present.

6 REFERENCES

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