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3-4 Charles Street, Wrexham, LL13 8BD

Grid Reference-SJ 33674 50256

Inspection & Assessment in Relation to Bats

Prepared for:

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Summary

A planning application regarding the terraced properties referred to as 3-4 Charles Street proposes significant repair works for safety reasons due to on going issues with vandalism and antisocial behaviour to the rear of the premises. The work will include renovation and extending the existing buildings to bring them up to modern energy efficient standards and in doing so provide residential accommodation. The Tyrer Partnership was therefore commissioned to undertake a daytime assessment of the properties in relation to bats which was conducted during March 2017.

The internal inspection revealed that the buildings do not feature true loft spaces; as a consequence of this the building are considered as being highly unfavourable for utilisation by void dwelling bats such as the Lesser Horseshoe (*Rhinolophus hipposideros*) or Brown long-eared bat (*Plecotus auritus*), which are species' that favour large, undisturbed and sufficiently dark spaces that allow free flight – particularly in terms of a maternity roost. No evidence of use was found that would suggest use of the building by these species during the inspection.

Underfelt was found to be absent beneath some of the roof slates but bitumen lining and sarking boards were present in the other due to the construction of the roofs, dating back to its mixed previous use and its staggered extension. The presence of such insulating materials – most often underfelt beneath roof slates/tiles can provide opportunity for crevice dwelling species, whereby they often roost between tiles/slates and roof lining materials, provided external access exists.

During the external assessment it was noted that numerous opportunities for ingress by bat species such as the Pipistrelle are present at the roof slates, gaps in brickwork where a former section has collapsed, under deteriorating fascia boards and at lead flashing. In spite of the heavily urbanised locality, features such as immature trees and patches of scrub feature in the locality; these attributes can be utilised by species such as the generalist Pipistrelle bat which are adapted to such environments.

In conclusion the 3-4 Charles Street is concluded to possess low-moderate potential for crevice dwelling bats. This would usually instigate the requirement for further surveys to be undertaken during the active season of bats (Good Practice Guidelines 2016 3rd edition). Notwithstanding this, and taking into consideration the location of the building, which is in a highly constricted urbanised setting which does not allow clear vantage points to view many of the roost potential features combined with the ongoing, acts of vandalism and antisocial behaviour at the site, dusk surveys will not be recommended. This is justified by the understanding that further damage will occur the longer the building remains as it is, which in turn will thus demise and compromise the potential present. Additionally there are factors raising concern for the safety of surveyors during the hours of darkness.

In lieu of dusk surveys a program of supervision work will be necessary whereby a licensed bat ecologist should supervise the careful and controlled removal of the features identified within paragraph 6.7. If, in the event that bat/s and/or evidence of use is found during those procedures the area/s will need to be made good to its/their original condition and the bat/s left in situ; further advice will then be provided by the bat ecologist.

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1.0 Introduction & Reason for Survey

- 1.1 A planning application regarding the terraced properties referred to as 3-4 Charles Street proposes significant repair works for safety reasons due to on going issues with vandalism and antisocial behaviour to the rear of the premises. The work will include renovation and extending the existing buildings to bring them up to modern energy efficient standards and in doing so provide residential accommodation. The Tyrer Partnership was therefore commissioned to undertake a daytime assessment of the properties in relation to bats which was conducted during March 2017. 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.



Site plan

- 1.2 The aim of the inspection was to initially ascertain if 3-4 Charles Street is of value to bats; if they were found to be suitable for bats. If bat/s or their roost/place of rest/shelter will be subsequently affected by the work then a Natural Resources Wales Development Licence would be required to legally proceed with the development.
- 1.3 The optimum time to investigate any structure 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.

2.0 Protected Species

- 2.1 All British bats and their **roosts are afforded protection under the 1981 Wildlife & Countryside Act (as amended) and are listed in Schedule 2 of the Conservation of Habitats & Species Regulations 2010 (as amended). 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 2010 Regulations and therefore has a statutory duty to have due regard to the provisions of the Regulations in the exercise of its functions.
- 2.2 *Planning Policy Wales* (PPW) (2002) sets out the land use planning policies of the Welsh Government (WG). It is supplemented by a series of Technical Advice Notes (TANs). Procedural advice is given in National Assembly for Wales / Welsh Office circulars. PPW, Ministerial Interim Planning Policy Statements (MIPPS), the TANs and circulars together comprise national planning policy to which local planning authorities in Wales must have regard in the preparation of development plans.
- 2.3 Detailed advice on the preparation of unitary development plans (UDPs) is contained in *Unitary Development Plans Wales*, 2001. Detailed advice on the preparation of Local Development Plans (LDPs) under the Planning and Compulsory Purchase Act 2004 is given in *Local Development Plans Wales*, 2005.
- 2.4 Technical Advice Note (TAN 5 2009) provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.
This guidance note should be read in conjunction with *Planning Policy Wales* (2002), in particular with Chapter 5 *Conserving and Improving the Natural Heritage and Coast* which sets out the Assembly Government's objectives for the natural heritage and the land use planning policies which support these.

When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:-

If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused

2.5 Use of Buildings by Bats

- a) Summer breeding roost.
- b) Hibernation.
- 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 2010 (Regulation 41) 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.

3.0 Protected Species in North Wales

- 3.1 Up to eleven bat species have been recorded in North Wales, most of which use built structures, notably occupied residential properties, for roosting. The most frequently encountered species is the Pipistrelle bat (*Pipistrellus*) and its abundant status in North Wales reflected throughout the UK.

4.0 Survey Methodology

- 4.1 BCT Survey Good Practice Survey Guidelines 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.

- 4.2 In context with the above the survey was conducted by Ms K. Swift MSc Conservation Management, an experienced ecologist and bat surveyor, who holds a Class 2 Natural England Bat Licence (22801-CLS) but more relevant the site is an accredited agent on the NRW bat licence held by Mr S Irwin. (73156: OTH:CSAB:2016. The results, conclusions, and recommendations have been assessed by Mr Irwin who is director of The Tyrer Partnership and his assessment concurs with that of Ms Swift.

- 4.3 The daytime survey was conducted on the 27th March 2017 when 3-4 Charles Street was inspected for potential places that may be of value to bats and if evidence of use was present. The external elevations were investigated from ground floor level with close focussing binoculars for places that are frequently used by bats as roosts or ingress points providing access into roost chambers. The buildings do not feature true loft spaces or any accessible voids however all upper storey internal features were inspected using a high powered torch where necessary.

- 4.4 The results, conclusions and recommendations are based on a number of factors i.e.

Practical experience of surveyor

Knowledge of bat species relevant to the site location

Nature of the immediate and surrounding habitat in relation to foraging opportunities

Condition of the structure

Presence/absence of roost potential

Value of roost potential – if present

- 4.5 During the survey the surrounding habitat was evaluated in relation to bats as very often roost selection is closely correlated with the surrounding habitat.

5.0 Constraints

- 5.1 The daytime survey was conducted just outside of the active period and breeding season, when bats are at their latter stages of hibernation although infrequent activity can be recorded within these early spring months when they emerge from torpor to feed or drink but maternity colonies are not formed. Due to this seasonal timing evidence of use by bats on the exterior of buildings is often absent, having been removed by weather elements.
- 5.2 Most internal/external features at the building could be assessed with the exception of some areas where the confined parameters of the building combined with its height restricted viewing. However; an appraisal was achievable in relation to assessing the level of bat roost potential that may exist based on the visible attributes of the building.

6.0 Results

- 6.1 The sizeable building comprises of two mid terraced properties which feature extensions in the form of commercial/industrial buildings to the rear. The terraced properties are entirely open internally acting as one building but are referred to as 3-4 Charles Street. Located within the busy, expanding and highly urbanised town of Wrexham the terraces are to the end of Charles Street, a narrow traditional, pedestrian street, featuring numerous buildings of similar character and largely used for commercial purposes.
- 6.2 Natural and semi natural features are extremely sparse within the vicinity with the only patch of mature broadleaved trees located within the grounds of a nearby church 180 metres west of the site. Some amenity features within the wider locality can provide a low level of semi-natural cover which comprises broadleaved scattered trees and amenity grass, the closest of which is Bellevue Park 500 metres west. Significantly further south west at a distance of 1.7 kilometres from the site the landscape changes from urban to predominantly rural with the River Clywedog and the extensive mature grounds of Erddig Hall. Both feature numerous attributes anticipated to be productive for foraging bats including expansive areas of mature broadleaved tree and established gardens. However, the environs immediate to the site are largely isolated from this wider long-established local ecological network which is highly likely to provide a valuable resource by offering suitable habitat and access to the further landscape.
- 6.3 The habitat as described immediate to the site and its poor connectivity to more productive areas within the wider ecological network is not considered to be of high value for the species for which the survey was undertaken i.e. bats. With the immediate environs to the site considered only likely to be productive for species more adapted to urbanised environments such as the Pipistrelle. Where such habitat is present close to built structures then the percentage use of those structures, by bats increases, given that roost opportunities are available and vice versa.



Location of 3-4 Charles Street amid the surrounding landscape

- 6.4 The building referred to as 3-4 Charles Street comprises two three storey traditional terraced buildings which are united internally forming one large building; it is of brick construction with partial render finish and slate covered pitched roof which runs parallel to Charles Street and stone masonry features to the front (south facing) elevation. The front three storey section is currently in use and as such it is good condition and constantly heated, although signs of water ingress are apparent in some areas, the interior features vaulted ceilings and as such loft spaces are absent. To the rear elevation a number of commercial extensions exist, all are brick built single two storey with a largely transparent roof although some of the extensions possess pitched slate covered roofs. The extensions have been largely unoccupied but used for storage purposes for a significant amount of time without any form of integrated heating system. Internally they are open to the ridge where a combination of roof linings are present although in places lining is entirely absent.
- 6.5 The presence of lining beneath a primary roof covering can provide opportunities for crevice dwelling species, whereby they often roost between tiles/slates and roof lining materials such as the felt and sarking present on the site, provided external access exists. 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 historic or recent evidence that would suggest the presence of this or any other crevice dwelling species was not located, however, this can often be the case due to their preference for crevice situations where droppings are often confined within the constricted space utilised by the bat.
- 6.6 From the combination of the buildings internal attributes i.e. lack of productive features for loft dwelling bats within the surveyed building it is deemed to be unfavourable for such species and no evidence of use was found by these bat species during the inspection to suggest their presence. Furthermore the localised habitat is unsuitable for their specific foraging requirements.

- 6.7 During the external assessment it was noted that the building features numerous areas at which ingress opportunity and roosting opportunities for crevice dwelling bat species are present. In several areas mortar has deteriorated under the ridge tiles additionally across all visible roof areas raised slates are noted. Furthermore to the upper stories on all elevations there are places where mortar is absent between the bricks and around window lintels. Other typical external facets favoured by crevice dwelling bats such as fascia boards are present to the east elevations and north elevations only at which in several places gaps are evident. To the north of the building where previous wall collapse has occurred the exposed brickwork features numerous crevices.

7.0 Conclusions

- 7.1 From the survey results it can be concluded that the buildings would not meet the typical requirements of loft dwelling species and the surrounding habitat is not suitable to meet the specific foraging requirements of these species. No recent or historic evidence of use was identified internally or externally and incentive and opportunity is conclusively absent thus the proposals will not impact on loft dwelling bat species.
- 7.2 From ground floor level potential appears to be present in numerous places across all roof structures for roost opportunities for crevice dwelling bats. Taking into consideration the relatively poor nature of the localised habitat and the bat roost potential that is present the classification of the building, relative to bats, is categorised as low to moderate bat roost. This classification would usually instigate recommendations for dusk/dawn surveys to be undertaken at the property prior to its demolition, however, significant constraints are considered to be present in respect to this action; therefore the following recommendations will be applicable.

8.0 Daytime Survey Recommendations

- 8.1 The location of 3-4 Charles Street prevents viable vantage points for dusk/dawn surveys and in combination with the anti social behaviour that is evident at the site, which may be detrimental to the safety of surveyors during the hours of darkness, dusk/dawn surveys will not be recommended.
- 8.2 In lieu of dusk surveys precautionary measures will be necessary whereby a licensed bat ecologist should supervise the careful and controlled removal of the features identified as containing bat roost potential within the survey results. However; prior to removal of those features the ecologist will check all such places for the presence of bat droppings. The building contractor will be required to provide a safe means of access for the ecologist to undertake inspection followed by the supervised dismantling of any areas within the work scheme that have been identified as containing places that could be used by bats. If, in the event that bat/s and/or evidence of use is found before or during those procedures the area/s will need to remain/be made good to its/their original condition and the bat/s, if present left in situ; further advice will then be provided by the bat ecologist.

- 8.3 It should be noted that where bat/s or their roost/place of rest/shelter will be affected by the proposed works, then to allow work at the site to legally continue, an application for a Natural Resources Wales Development Licence will be required. In the absence of dusk/dawn surveys the ecologist would make an informed appraisal about the species and roost status. Notwithstanding the granting of a licence works that would affect a roost cannot take place if a maternity colony is in occupation. It should also be noted that before a licence can be applied for all Planning issues including Consent and any pre-commencement Planning Conditions relative to bats should be resolved.
- 8.4 As part of Wrexham Councils biodiversity strategy provisions and in line with Technical Advice Note (TAN 5 2009) which provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. Provision for the crevice dwelling Pipistrelle bat should be incorporated into the new development as compensation for loss of bat roost potential and subject to proposed elevation drawings being made available suggestions for this purpose can be provided by the ecologist.

**APPENDIX I –
Site Photographs**



Gaps to the verge at the rear elevation



Rear elevation where partial collapse has occurred



Gaps at lintel



Side elevation of three storey section at the rear



Vaulted roofs



Area where sarking boards are present



Open nature of lower rear section



Interior of glass roofed section