Bat survey and Bird Assessment

at Cefn Mawr Police Station, Cae Gwilym Lane, Wrexham LL14 3LT

Demolition of building

March 13th 2025



Produced by Wildbanks Conservation

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REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

Report Version	Date	Completed by:	Approved by:	Date
Draft	10/03/2025	Tanya Cobb	Mick Smith	13/03/25

The information we have prepared is true and we confirm that the opinions expressed are our true and professional bona fide opinions.

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1.0 INTRODUCTION

1.1 Background

1.1.1 Wildbanks Conservation was commissioned by Wrexham County Borough Council (WCBC) to undertake a Preliminary Roost Assessment (PRA) of Cefn Mawr Police Station, Cae Gwilym Lane, Wrexham LL14 3LT (Approximate OS Grid Ref. SJ 27744 42031).

1.1.2 The PRA was required to establish the presence or potential presence of roosting bats at Cefn Mawr Police Station (the Site), identify potential constraints to the proposal and outline the requirement for further surveys and/or mitigation measures where relevant. If bat/s or their roost/place of rest/shelter is identified and subsequently affected by the work then a European Protected Species Development Licence, issued by Natural Resources Wales (NRW) would be required to proceed with the development.

1.1.3 The existing building was also investigated and assessed for its suitability to provide nesting opportunities for birds and recent or historic signs of nesting birds.

1.2 The Proposal

1.2.1 It is proposed to demolish the Police Station building and replace with residential flats. No formal plans have been provided to Wildbanks Conservation at this time.

2.0 SITE DESCRIPTION

2.1 Survey Area

2.1.1 The Site is located within a residential area of Cefn Mawr town. The immediate habitat is dominated by areas of residential development with associated infrastructure and sporadic green spaces. Occasional trees are also present in the vicinity of the survey site including a small woodland copse to the south of the Site. This immediate habitat surrounding the site is considered to be of low value to bats.

2.2.2 The wider landscape incorporates small towns, woodland, farmland, the River Dee and Llangollen canal. The habitat in the wider landscape is considered to be of high potential value for bats.

2.2.3 The location of Cefn Mawr Police Station and the immediate surrounding habitat is shown on the aerial photograph below (Figure 1).



Figure 1: The Site is shown by the red line. Approximate only. Base Image © Google 2025.

2.2 Statutory and Non-Statutory Designated Sites

2.2.1 There is one statutory designated site within 1km of the Site: River Dee and Bala Lake (SSSI/SAC), designated for its water course vegetation and value to Atlantic Salmon. The River Dee is a known commuting route for bats and at slow moving portions of the river, may facilitate bat foraging.

3.0 METHODOLOGY

3.1 Preliminary Roost Assessment

3.1.1 The building was assessed for any signs of bats; with the aid of binoculars and borescope, features such as small gaps under barge/soffit/fascia boards, raised or missing roof/ridge tiles or gaps at gable ends, which have the potential for use as access points, were sought. Evidence that bats actively used these potential access points would include staining within the gaps, or bat droppings or urine staining under gaps; a note being made wherever these were present. The presence of cobwebs and / or general detritus within and around potential access points was used as an indicator that bats had not recently used the area to access the building. Photographic evidence was taken where necessary.

3.1.2 The building inspection was carried out on 10th March 2025 by Mick Smith, Wildbanks Conservation, (NRW bat license S092489/1), and assisted by Tanya Cobb, Wildbanks Conservation. Where deemed necessary Potential Roost Feature (PRF) assessments were

carried out following best practice guidelines, and the building was categorised into negligible, low, moderate or high potential to host roosting bats (Collins, 2023).

3.1.3 All trees on Site were also assessed for their potential roost features, in line with current guidelines (Collins, 2023).

3.2 Nesting Bird Assessment

3.2.1 The building and immediately surrounding habitat were assessed for its potential to support nesting birds. The exterior elevations of the building were inspected for historic and current signs of nesting bird, particularly historic nests.

3.3 Limitations

3.3.1 There were no significant limitations to the assessment. All areas of the building could be accessed; however, as the assessment was carried out in March, outside the main activity season for bats (May to August), signs of bat activity from the previous year's bat season may have been washed away by weather and signs from this years activity may not have built up sufficient to aid the identification of roost locations.

3.3.2 There was no access to the loft space in the garage during the assessment as no loft hatch is present, however, as no PRFs or access points were found within the external of the building, ie under roof slates or ridge tiles or from the internal garage, it is considered unlikely that bats are able to use the loft space and it is therefore, not considered further in this report.

3.3.3 The assessment was carried out within the main activity season for birds (March to September). As such any signs of bird activity would be visible.

3.3.4 It is considered that there are no significant limitations that would reduce the veracity of the conclusions or recommendations detailed within this Report.

4.0 SURVEY RESULTS

4.1 Building Descriptions

4.1.1 The Site comprises a two-storey detached building with two single storey, flat roof extensions to the North and East and a detached double garage to the east. The building is recently unused (circa 2 years) but previously used as a police station.

4.1.2 A hard-standing carpark lies to the southwest of the property, and amenity grassland to the northeast. The property is bounded by fence lines on all four sides, with occasional shrubs along the southwestern perimeter with bird nesting potential.

4.1.3 No trees were found on Site, however, adjacent to the Southeast is an area of scrub with semi mature trees, including two immature Ash trees that overhang the property boundary that may require felling during the demolition works. No PRFs were observed in either of these two Ash trees. No other trees within the adjacent area will be effected by the development, therefore, they will not be considered further within this report with regards to bats.

4.1.4 The external and internal descriptions of the building are detailed in *Table 1*.

Table 1 – Building Descriptions

External Description	External Photo	Internal Description	Internal Photo
<u>Police station building</u> The building is brick built and painted. Majority of the building is two-storey except for two extensions to the north and south, which are both one storey. The walls are very well sealed and in good condition. The pitched tiled roof is in great condition and appears to have been replaced in recent years. Mortar around ridge tiles appear mostly intact. The flat roof areas are roofing felt with lead flashing connected directly to brickwork. All doors and windows are PVC and well-sealed into the brick walls.	 Northeast elevation  Northwest elevation  Southwest elevation	Internal ground and upper floor office spaces are well sealed and in great condition. A loft space is present within the pitched roof and shows new, modern style, roofing membrane atop wooden rafters. Access to the loft is through a hatch in one of the upper floor rooms.	 Upper floor room  Ground floor room  Loft space

	 Southeast elavation		
<u>Detached Garage</u> The double garage is brick built with a pitched tiled roof. The walls are very well sealed and in good condition. The pitched tiles roof is in great condition. All doors are well-sealed into the brick walls.	 Southwest elevation  Northwest elevation	The internal garages are breezeblock walls and separated into two separate rooms with internal doorway access. The ceiling has been boarded but the loft space is well sealed and inaccessible.	

4.2 Potential Roost Assessment Results

4.2.1 No evidence of bat use was found within the building during the assessment of the Site. Evidence would have included, live bats, droppings, staining or feeding remains.

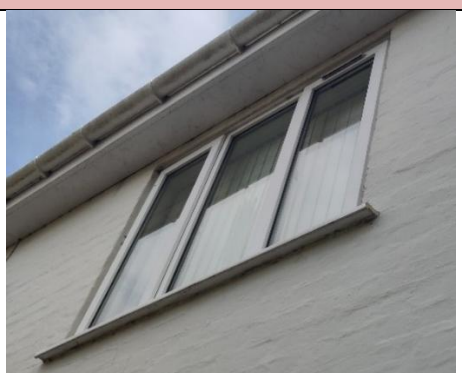
4.2.2 The building and garage are very well maintained and sealed to bats and birds. The brick walls are painted and well-sealed providing no access into the buildings or roosting opportunities within the brick wall itself. The windows and doors also provide no cracks or gaps around them suitable for hosting roosting bats or providing potential access into the brick wall cavity. The pitched and flat roof areas are in very good condition, with no raised or broken tiles or raised roofing felt. Any gaps between the lead flashing and brick walls were superficial and did not lead to a cavity big enough to host roosting bats. The mortar around the ridge tiles was largely intact except for one tile along the ridge beam where a 50mm section was missing mortar.

4.2.3 The loft space within the former police station was well sealed and insulated making the room very warm with a stable thermal regime to host roosting bats. However, no access for bats was present. There was no light ingress through the roof, which looked recently replaced and in great condition. Modern underfelt was present throughout in excellent condition.

4.2.4 Table 2 below provides details of the building and likely locations of PRF's within the building that then show no access points are present.

Table 2 – Potential Roost Features

Feature Description	Example Photos
Joins between soffit box and brick walls were well-sealed and intact. Few gaps were present where the fascia board had lifted from brickwork, but all gaps were two narrow to offer bat access and too shallow to provide suitable shelter for bat roosting.	 

Feature Description	Example Photos
The windows and doors are well-sealed with no gaps.	
The pitched roof is in great condition with all mortar intact except for one ridge tile facing northeast. The depth of this potential roost feature (photo top right) could not be ascertained from the ground, but due to the recent replacement of the roof and its structure including roofing membrane, it is unlikely that any roosting bat will be able to travel along the ridge beam. These type of ridge tiles sit directly on the roof slates on abed or mortar. For a gap to be present under the ridge tile the ridge tile would have to be damaged or the mortar missing. The felt roof is in good condition with no raised or broken areas. A gap between the lead flashing and brickwork was identified but ruled out as a potential roost feature due to no access to any cavity and the hole being too shallow to maintain constant temperature.	 
All garage doors were well sealed to the brickwork, as well as the soffit box all around the perimeter of the building. The soffit box has ventilation gaps (photo top right); however, these were too small for a bat to fit through. No access for bats was present. One gap on the underside of the soffit box at its apex on the front of the garage was identified (bottom right). Upon inspection it was found to be completely covered in cobwebs showing no use by bats.	 

4.3 Nesting Bird Assessment

4.3.1 The building lacks any features that provide opportunities for any bird species. There are no holes or cracks that could be utilised by small bird such as blue tits or larger openings that could be used by robins or blackbirds. Opportunities for swifts do no exist either and no evidence of house martin nests was identified.

4.3.2 The shrubs situated to the west of the property and the ivy covering the boundary fence to the southeast and northwest could provide nesting possible places for bird to nest. No evidence of birds nesting within these shrubs was seen. Table 3 provides details of these.

Table 3 – Potential bird nesting habitat

Feature Description	Photos
Shrubs situated to the west of the property and bounding the property from the road (top right). Ivy covering the boundary fence to the southeast (middle right) and northwest (bottom right) with potential to host nesting birds.	 

Feature Description	Photos
	

5.0 DISCUSSION AND RECOMMENDATIONS

5.1 This Site has been subject to a bat Preliminary Roost Assessment on the 10th March 2025. No evidence of bats using the Site or features that could potentially be used by bats were identified during the assessment.

5.2 Habitat within the Site consist of parking and a small garden with small shrubs that offer no potential for roosting bats. Adjacent to the Site is a strip of scrub with some trees that would offer some limited foraging potential. The trees within this area will not be effected by the development. Two small ash trees do overhang the Site and these may be removed to facilitate the development. These trees are young small barked ash trees and do not have any features that could be used by bats.

5.3 The immediate habitat surrounding the Site is predominantly residential properties with small areas of parks and trees that could be utilised by foraging bats. Overall, the habitat surrounding the Site is considered of low quality for bats. The wider habitat beyond Cefn Mawr includes areas of woodland and pasture, as well as the River Dee (SSSI/SAC), which consists of excellent habitat for bats for commuting and foraging. Therefore, the wider landscape is considered to be of high potential value for bats.

5.4 The building is very well sealed and maintained, the roof was in excellent condition and all windows and doors did not have any suitable bat access points or potential features suitable for bats. One small gap under a ridge tile was identified as a potential roost feature. However, due to its less than optimal, north facing access point, the small chance that a roost exists beyond this access point due to the construction of the ridge tile and the likelihood of more desirable roosting habitat within woodland blocks up to 1km from the Site, it is considered unlikely that this access point would be utilised by roosting bats. Therefore, the overall building is considered to have **negligible potential for roosting bats.**

5.4 The building also has no opportunities for nesting birds, however, potential nesting habitat was identified within the shrubs to the west of the building and the ivy-covered fences to the northwest and southeast. No evidence of birds using this was seen during the survey.

5.6 Recommendations; bats

5.6.1 All buildings have been categorised as having negligible bat roosting potential. As such no further survey work is recommended for bats and the works can proceed without Reasonable Avoidance Measures (RAMs). If works to the buildings does not commence within 2 years from the date of this report a re-assessment of the building for its suitability for bats should be carried out.

5.6.2 As bats were not found to be using the buildings then **a European Protected species license will <u>not</u> be required** for the works. The demolition and clearance of the site can be carried out at any time of year (subject to nesting bird restrictions – *paragraph 5.7.1*).

5.7 Recommendations; birds

5.7.1 The disturbance and/or destruction of bird nests is prohibited under the *Wildlife and Countryside Act 1981* (as amended). If demolition works commence during the nesting bird season (March-August inclusive), there is potential for nesting birds to be disturbed and nests to be destroyed during the process. To avoid impacts on nesting birds, a pre-works nesting bird check of the Site should be undertaken by a qualified ecologist prior to any works taking place. If nests are identified, the nests must remain intact and undisturbed until young have fledged.

6.0 MITIGATION AND ENHANCEMENT MEASURES

6.1 Bats

6.1.1 Planning Policy Wales (PPW12) requires development to provide a Net Benefit to Biodiversity (NBB). I.E. a better outcome than if the site would be left undeveloped. Although loss of habitat on Site will be minimal and be isolated to a loss of small lawn area and some shrubs habitat improvements should be incorporated into the new development. Details of the future development of the Site have not been finalised yet and so the inclusion of integrated bat boxes can not at this time be guaranteed or the best location for them known.

6.1.2 With this mind and in order to enhance the wider area for bats and meet the PPW12 legislation, we would recommend installing two bat boxes, suitable for crevice dwelling bats, onto trees within other Wrexham County Borough Council owned land in the vicinity of the Site. Please refer to paragraph 6.3 below for potential box locations.

6.1.2 Bat box installation as per recommendations in Bat Mitigation Guidelines, 2016 and between 3-4m in height and positioned two per tree with clear flight path orientated between East and West.

- 2 x Schweglar 2F bat box

6.2 Birds

6.2.1 To compensate for the loss of bird nesting habitat in the demolition and clearance of the Site, and to enhance the area for birds, we recommend new bird nesting opportunities be installed onto trees within other Wrexham County Borough Council owned land in the vicinity of the Site. A minimum of four boxes suitable for small birds will be erected. Please refer to paragraph 6.3 below for potential box locations.

- 2 x 1B Schweglar 26mm diameter entrance hole boxes or similar
- 2 x 1B Schweglar 32mm diameter entrance hole boxes or similar

6.3 Potential bat/bird box locations

6.3.1 It is not known if suitable habitat or structures to install mitigation/enhancement bat or bird boxes will be present within the Site after the development. Few other green spaces are present in the vicinity of the Site. Therefore, we suggest contacting a Wrexham Council-owned local school with grounds and suitable trees to install the above six boxes. Following a desktop search of the local area, Cefn Mawr Primary School may be suitable with trees located approximately 300m from the Site to the southeast (approximate grid reference: SJ 28005 41996). These trees have not been scoped for their suitability or the school contacted to gauge their willingness to have these boxes within their grounds so other sites may be considered in consultation with Wrexham Council.

7.0 LEGISLATION

7.1 Bats

The *Wildlife and Countryside Act* (WCA) *1981* (as amended)[1] forms the key legislation protecting habitats and species in the UK. All UK bat species are fully protected under the 1981 Act through inclusion on *Schedule 5*. All bats are also listed under *Schedule 2* of the *Conservation of Habitats and Species Regulations (2017)*[2,3] which transcribes the EC Habitats Directive into UK law. In combination, this legislation makes it an offence to:

- Deliberately or recklessly take, injure or kill a bat;
- Deliberately or recklessly damage or destroy a place or structure used by bats for shelter or protection;
- Deliberately or recklessly obstruct access to a bat roost; or
- Deliberately or recklessly disturb bats while occupying a roost.

Bat roosts are protected under these laws whether the animals are present at the time of survey or not. Under both laws the English Government and D.E.F.R.A. are empowered to issue licences to carry out work to bat roosts for reasons of overriding public interest. It is not illegal to tend to a disabled bat pending recovery.

7.2 Birds

In addition, under the *Wildlife and Countryside Act, 1981* (as amended) and the *Countryside and Rights of Way, 2000*, all wild birds, their nests and eggs are protected during the breeding season (typically March to August inclusive). This makes it an offence to:

- Intentionally kill, injure or take any wild bird;
- Take, damage or destroy the nest of a wild bird included in Schedule ZA1;
- Take, damage or destroy the nest of any wild bird while that nest is in use or being built;
- Take or destroy an egg of any wild bird.

[1] HMSO (1981). *The Wildlife and Countryside Act 1981*. HMSO, London.
[2] HMSO (2017). *The Conservation of Habitats and Species Regulations 2017*. HMSO, London.
[3] Updated by HMSO (2021). *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.* HMSO, London.

8.0 REFERENCES AND INFORMATION SOURCES

1. Collins, J. (ed.) (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines, (4th Edition)*. Bat Conservation Trust, London.