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 of other suitably qualified person. You are strongly advised to refer to the Bat Mitigation Guidelines[1], 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.

Contact Details

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Method Statement Title:	Coed Derwen – Method Statement
Method Statement Version Number:	1.0
Method Statement Issue Date:	03/06/2025
Site Address:	Coed Derwen, Erbistock, LL13 0DN

[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

To support a planning proposal for the part demolition and part conversion of a barn at Coed Derwen, a daytime PEA with inclusive PRA was carried out by Andy Harmer Ecology Services (see associated documents submitted in support of the application), which determined that the main barn on site (noted as Building 1 in the PEA) pertained to 'Moderate' bat roost suitability, based on the presence of "prey remains (Lepidoptera wings) and low numbers of scattered bat droppings, including both desiccated and fresh droppings".

Based on the above categorisation, two further dusk emergence surveys were carried out within May & June 2024, thus within the 2024 active season of bats; the surveys recorded the emergence of a single brown long-eared bat and a single soprano pipistrelle.

The proposed works are considered to present a risk of impacting upon both of the bat species present on site; in the absence of suitable mitigation measures this would result in a site level impact for both of the species recorded as roosting within the barn.

Both of the identified roosts will be destroyed during the works; mitigation measures will be integrated into the fabric of the new building which will ensure the long term retention of roosting provision. When considered in tandem with the erection and retention of two receptor roosts on site, the works will result in a net-neutral – positive impact for bats.

B Introduction

B.1 Background to activity/development

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

Proposals are understood to involve the extension and conversion of the barn to dwelling and erection of new detached garage. Currently, five agricultural structures are present on site, in varying states of disrepair and disuse, and should they not be subject to remedial works there is a high likelihood that the structures would continue to degrade until their eventual collapse; renovation of the structure will, therefore, ensure the retention of the building (and in turn the bat roosts) for years to come.

The site associated documents, including the Planning Statement (NSC Planning Limited, December 2023), provide a myriad of information as to the necessity and benefits of the proposals in line with national and local policy. Section 7.0 of the planning statements includes the following extracts:

"The proposal is fully compliant with national and local policy, particularly H3 and H5 of the UDP. The proposal offers an attractive, well-maintained property within the countryside which will greatly improve the character of the local area. The new measurements of the extension are smaller than what currently exists, and there will be even less harm done to the visual outlook of neighbouring properties and the road adjacent to the site.

The site is suitably located within walking distance of several key services, as well as accessible public transport links which connect the site to Wrexham, where there are even more services and amenities on offer.

The removal of the rundown side buildings will benefit the appeal of the site, and the overall footprint of the site will be greatly reduced. The proposed garage block is well hidden from the street scene by hedgerows and newly planted trees to complement its development. The Garage block will hold up to 3 vehicles and offer an electric vehicle charging point, ensuring that the site is sustainable.

The new proposal aligns with both national and local policy. Of relevance is policy EC4 and EC5 of the UDP. The site will be materially smaller once development has finished, and there will be more green space which will enhance the local ecology and biodiversity. The demolition of the rusted outbuildings will improve the

conservation area status of the site and its overall attractiveness. Should a bat survey be required this can be conditioned as part of the application and full mitigation can be provided should bats be found present.

The current state of the site offers very little to the overall appeal of the area. The new proposal offers a design which uses local characteristics to its benefit, whilst being respectful of the rural properties in the nearby area. It will not look out of place once completed.

The visual outlook of neighbouring properties is not harmed by the proposal, and, from a highway's perspective, the proposal will not cause harm to the adopted bike and traffic lanes near to the site.

Overall, it is politely requested the council consider all the information within this statement, as well as the supporting documents, and grant approval for this planning application in favour of policy H3 and H5 of the UDP and in favour of sustainable development."

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 proposals entail the conversion of the existing residential barn, which will include the destruction of the existing locations of the bat roosts; in addition, works could constitute disturbance if carried out without suitable ecological mitigation measures.

Full planning consent has been granted by Cyngor Bwrdeistref Sirol Wrecsam / Wrexham County Borough Council on 19th December 2024 under reference number P/2024/1336.

Condition 8 of the decision notice states:

"8. No development shall commence until a Bat Conservation Plan has been submitted to and approved in writing by the Local Planning Authority. The Conservation Plan shall include, but not necessarily be limited to:

• Build upon the principles outlined in the ecological report;
• The submission of further details including plans of all bat roost retention and compensation proposals. Plans shall clearly illustrate the locations of all retained and proposed entrance/exit points;
• The submission of further details concerning the prevention of injury or killing of bats during construction and post-construction;
• Details of timing, phasing and duration of construction activities and conservation measures;
• Timetable for implementation and demonstrating that works are aligned with the proposed phasing of the development;
• Actions to be taken in the event that previously unidentified species of bat are found;
• The submission and implementation of an approved ecological compliance audit (ECA) scheme to the satisfaction of the LPA. Given the significance of the roost, we advise that the ECA is carried out by an external body. The purpose of the ECA is to evidence compliant implementation of all ecological avoidance, mitigation and compensation works, either proposed or subject to the provisions of reserved matters conditions. The ECA shall identify Key Performance Indicators (KPI's) that are to be used for the purposes of assessing and evidencing compliant implementation of proposals;
• Persons responsible for implementing the works;
• Post-construction monitoring and record dissemination for a period of not less than 5 years;
• Submission of details including plans concerning external lighting together with any light spillage originating from internal locations. This component requirement shall include plans illustrating projected or retained bat emergence points; together with retained or proposed features such as existing and proposed landscaping and vegetation that currently or are planned to be functionally used by bats for foraging/dispersal purposes.

Provisions of the scheme shall accord with the provisions of the Institution of Lighting Professionals and Bat Conservation Trust: Guidance Note 08/18: Bats and Artificial Lighting in the UK. The Conservation Plan shall be carried out in accordance with the approved details."

Whilst neither the above nor the informative / notes to applicant located towards the end does not specifically discuss the need for a bat licence, it is considered that it is necessary in order to legally impact upon two places used for day roosting purposes by two species of bat. The licence and associated documentation is also considered to satisfy all of the necessary points listed in relation to the Bat Conservation Plan.

B.3 Actions requiring licensing,

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

Licensable actions will include potential disturbance of two bat species, the brown long-eared (*Plecotus auritus*) and the soprano pipistrelle (*Pipistrellus pygmaeus*), the capture of a single member of both of the listed species of bat, as well as the destruction of two places used as a day roost, one for brown long-eared and the other for soprano pipistrelle. This will allow the conversion of the structure which will ensure the retention of an agricultural and rural asset, as well as ensuring the long-term establishment of dedicated roosting provision.

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)

A Preliminary Ecological Appraisal (PEA) was carried out in 2024 by Andy Harmer Ecology Services (see associated documents submitted in support of the application), which determined that the main barn on site (noted as Building 1 in the PEA) pertained to 'Moderate' bat roost suitability, based on the presence of "*prey remains (Lepidoptera wings) and low numbers of scattered bat droppings, including both desiccated and fresh droppings*".

Based on the above categorisation, two further dusk emergence surveys were carried out within May & June 2024, thus within the 2024 active season of bats; the surveys recorded the emergence of a single brown long-eared bat and a single soprano pipistrelle, alongside foraging and commuting behaviour by both of these species alongside common pipistrelle (*Pipistrellus pipistrellus*), noctule (*Nyctalus noctula*) and natterers (*Myotis nattereri*) bats. Along with the 2024 survey work, an Extended Phase 1 Habitat Survey was undertaken by Andy Harmer Ecology Services in 2021.

Given that a large amount of survey work has been previously undertaken at the application site, it is considered unnecessary to commission a commercial data search. A search of LERC submitted data records held by Tyrer Ecological Consultants Ltd revealed the presence of a single confirmed bat roost within 2.0km, located at a distance of 700m to the north-west of Coed Derwen. This record pertains to a structure host to three soprano pipistrelle day roosts, as well as activity records for noctule, serotine (*Eptesicus serotinus*), Daubenton's (*Myotis daubentonii*), natterers and common pipistrelle bats.

Based on analysis of the proposals and suggested mitigation, the proposals are considered highly unlikely to result in a detrimental impact to local bat populations.

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

A single designated site with multiple designations is present within 2.0km of the site; the River Dee and Bala Lake / Afon Dyfrdwy a Llyn Tegid SAC and the Afon Dyfrdwy (River Dee) SSSI. Neirther of these appear to be notified for their bat interest, though given that the species present at Coed Derwen are not listed on Annex II of the Habitats Directive they would not individually be a constituent of the designation features.

It is acknowledged, however, that these designated sites, and their associated riverine habitats including open water, dense woodland and floodplains, provide high value foraging and commuting habitats for the bat species identified as being present within the application site.

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 aims of the survey were to determine the presence / absence of bats at the building, and, if present, identify the species and population size, and determine the status of the roost(s) e.g., maternity, hibernation, day, transitional, night roosts; foraging commuting or swarming sites.

The survey also aimed to locate all of the roost information, including the dimensions, access points, atmospheric and structural conditions (where possible), to ensure that mitigation measures can be designed to ensure that the bat colony present will not be adversely impacted upon by the proposed works.

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.



Figure C4.1 – Location of the application site (red boundary) in the context of the wider environment at a scale of 1:25,000

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).

Habitat / Geographical Context

Coed Derwen is located off the A528, 6km east of Wrexham. The site currently comprises a number of dilapidated agricultural structures, gardens and disused land. It sits within a pastoral landscape, close to the River Dee. The site is surrounded by habitats such as ponds, woodland and pasture, with hedgerows and tree belts. Many of the streams and river corridors in the vicinity are flanked with deciduous woodland. See **Figure C5.1** overleaf for a satellite image showing the landscape context.

Building 1

Building 1 is an amalgam of structures with multiple compartments. The walls are a mix of brick, natural stone, wood and concrete. The roof is a wooden framework supporting corrugated tin and slates. The structures are dilapidated, with gaps in the exterior throughout (see associated bat survey report for annotated photographs). Prey remains (Lepidoptera wings) and low numbers of scattered bat droppings, including both desiccated and fresh droppings, were located in Building 1.



Figure C5.1 – Location of the application site (red boundary) in the context of the immediate environment at a scale of 1:5000, showing clear connectivity via hedgerows, tree lines and areas of deciduous woodland flanking the River Dee

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.

The following is extracted from the PEA report:

"Andy Harmer, Principal Ecologist, and Sam Harmer, Senior Ecologist, undertook the survey on 3rd May 2024. Andy Harmer has over twenty years of experience of habitat and protected species surveys and holds protected species licences. Sam Harmer has been undertaking protected species surveys for many years. The entire site could be surveyed. There were no constraints to the survey."

The following is extracted from the Bat Survey report:

"Two dusk emergence surveys were undertaken. Four surveyors and three cameras (two infra-red and one thermal) were used to monitor the building, to ensure adequate coverage of the building to observe any emerging bats.

The dusk emergence surveys began at least 10 minutes before dusk and continued for at least 60 minutes after dusk. The surveyors used three Anabat bat detectors (a Chorus (which was used inside the building as a static detector), an Express and a Walkabout), and two Echometer bat detectors, to record the echolocations of any emerging bats. The cameras used for infra-red monitoring were Sony Handycams; these have an infrared facility where it can see in complete darkness. A bank of four, and a single large illuminator, were used to survey a section of the building. A Thermal Imaging Camera (Helion pulsar 2) was also used if light conditions required it.

The two dusk emergence surveys were undertaken on 19th May 2024, and 10th June 2024. May and June are optimum months within which to carry out bat activity surveys. Two surveys were considered enough to robustly determine the roost type.

Andy Harmer (Principal Ecologist) and assistants carried out the activity surveys. Andy has over twenty years of experience of protected species surveys, including bat surveys and assessments. Andy Harmer is an accredited agent of Joel Hacking, licensed by Nature Resources Wales (NRW) under licence no.: S091063/1. Andy has also held a Class 2 Natural England bat survey licence for over six years (reference: 2017-28547-CLSCLS).

All buildings were accessible and there were no impediments to the activity surveys, therefore there were no constraints to the surveys."

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.

The following is extracted from the Bat Survey report:

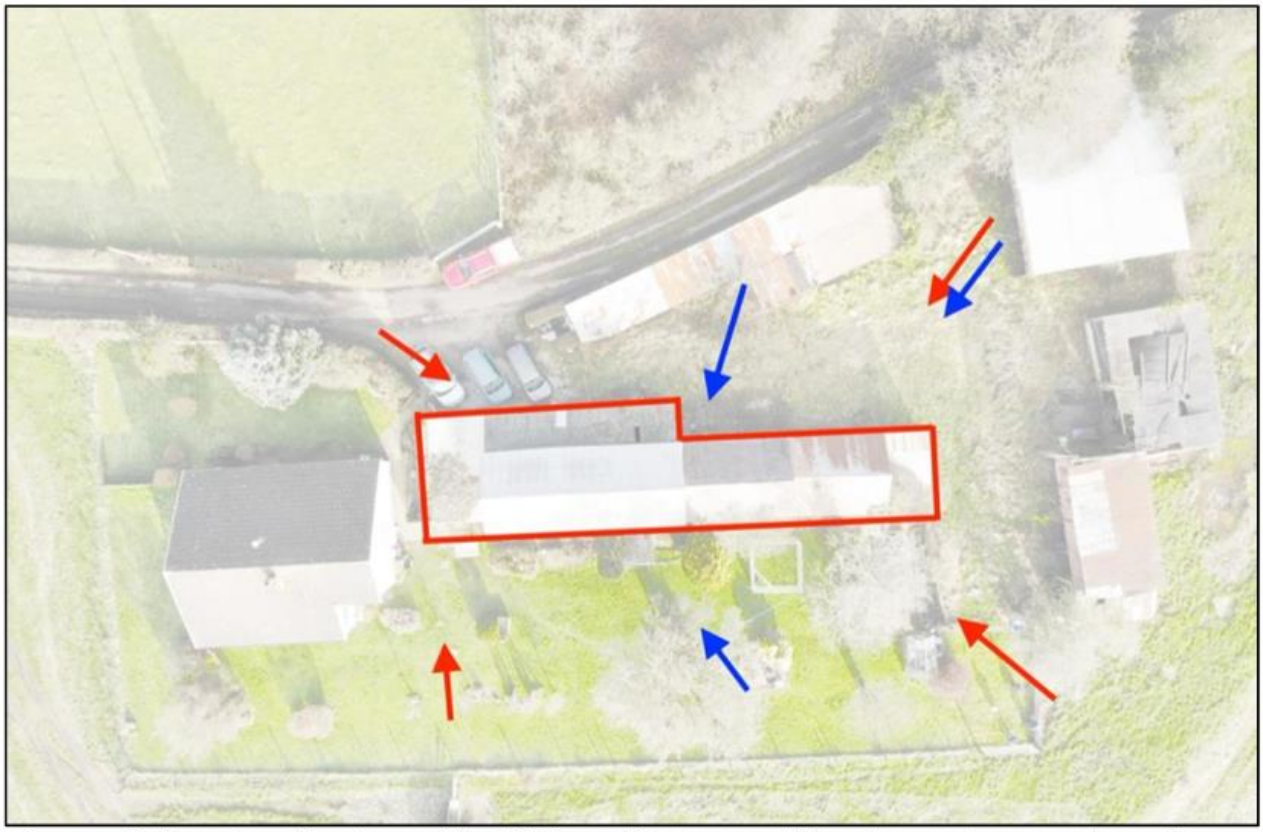


Figure 3 showing the target building within a red line boundary and positions that bat workers stood (red arrows) and cameras positioned (blue arrows).

"A maximum of one Brown Long-eared Bat Plecotus auritus and one Soprano Pipistrelle Pipistrellus pygmaeus emerged from Building 1 during the dusk emergence surveys.

A small amount of foraging and commuting bat activity was recorded throughout the surveys. Common Pipistrelle Pipistrellus pipistrellus, Soprano Pipistrelle Pipistrellus pygmaeus, Noctule Bat Nyctalus noctula and a single Natterer's Bat Myotis nattereri was recorded. These were all recorded, and sometimes observed, foraging and commuting over the site and adjacent road and farmland."

	Table 1. Bat activity and timings during the survey on 19/05/24
1.	Brown Long-eared Bat calls recorded from static detector inside of Building 1 at 21:25 for a period of ten minutes
2.	Common Pipistrelle Bats foraging regularly over the site and farmland between 21:13 and 22:00.
3.	Several Soprano Pipistrelle Bats foraged over the site and adjacent hedgerows infrequently between 21:15 and 22:03.
4.	Noctule Bat recorded commuting overhead at 21:04

Table 2. Weather conditions during the survey 19/05/2024	
Sunset:	21:12 (21:00 – 22:20)
Temperature (low):	15°C
Beaufort Scale:	2
Weather:	Partly cloudy

	Table 3. Bat activity and timings during the survey on 10/06/24
1.	1 x Brown Long-eared Bat emerged from a gap roughly halfway along building 1 where the roof sits on the wall hole. Emergence was at 22:04
2.	Common Pipistrelle Bats foraged over the site and adjacent road and farmland regularly between 2155 and the end of the survey
3.	A single Soprano Pipistrelle Bat emerged at 2149 from above a wooden door under the eaves of building 1.
4.	1 x Natterer's Bat recorded over site at 22:16

Table 4. Weather conditions during the survey 10/06/24	
Sunset:	21:39 (21:25 – 22:50)
Temperature (low):	12°C
Beaufort Scale:	3
Weather:	Mostly cloudy

The Bat Survey Report states the following:

"The bats emerged and re-entered Building 1 at the apex of the eastern gable end (see Photograph 9)."

However, this is understood to be incorrect based on the descriptions listed previously within Table 1 & 3 above, and also based on Photograph 9 as below:



Photograph 9 showing the bat emergence points for the Brown Long-eared Bat (red arrow) and the Soprano Pipistrelle (blue arrow).

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).

The following is extracted from the Bat Survey report:

"During the bat activity surveys (two dusk emergence surveys), a maximum of one Brown Long-eared bat and a maximum of one Soprano Pipistrelle bat were observed emerging from Building 1. It can be considered that Building 1 supports a day roost for these two bat species."

The structure is therefore ascertained to be host to two day roosts; one of which is host to a single brown long-eared bat, and the other host to a single soprano pipistrelle bat.

In the absence of any further information within the bat survey report as to the location of the roosts, it is considered that the brown long-eared day roost is located within the wall plate on the northern elevation, and the soprano pipistrelle day roost is located within a crevice above the timber shutter on the northern elevation.

See **Figure C8.1** overleaf for the locations of the roosts on a satellite image to further aid in understanding.



Figure C8.1 – Location of identified roosts © Google Earth Pro 2024/25

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.

Based on the scope of the proposed works, there is a likelihood that disturbance would occur in the absence of mitigation that will be implemented as a feature of this licence. Any works in proximity to the roost locations, or high disturbance works in general at the site, could lead to disturbance via noise, vibration, dust and lighting, and pre-demolition works could also lead to noise, vibration and dust disturbance. Any scaffolding erected could obstruct access to the roost location, and if an ecologist was not present during any works at the identified roost locations, then contractors may not be fully conversant with the type of places that bats can access and utilise, and what to do in the event that a bat is located. All of the above could result in a site level impact for both of the bat species identified at the site.

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.

In the absence of mitigation, the roost would be destroyed without any appropriate mitigation put in place; thus potential modification impacts are not considered applicable.

[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.3 Long-term impacts: roost loss.
Impact on different species populations to be taken into account at local, regional, and national level.

Without the implementation of mitigation measures in the newly constructed building on site, both of the roosts will be destroyed. Both of these species are common and widespread both locally in Gwynedd and nationally throughout Wales, and the roost type (Day roost) for both species is of generally lower conservation status (Bat Mitigation Guidelines, 2023[3]). Given the species and roost type present, it is considered that, in the absence of mitigation measures, the proposals would result in a site level impact for both soprano pipistrelle and brown long-eared bats.

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.

If proposals were altered to result in the destruction of commuting pathways with no supplementary planting proposed, then it could lead to the severance of commuting pathways leading to and from the roosts and areas in proximity to the site with greater foraging potential, then this could lead to roost abandonment which, as above when considered under roost destruction, could result in a site level impact to the species encountered.

D.5 Post-development interference impacts.
E.g. extra street lighting, use of loft space as storage.

If lighting were to be increased and directed at either roost access points or key flight lines, it could prevent bats from being able to access the roost via long standing flight paths, and reduce the accessibility of the roost from surrounding areas of suitable habitat. This could lead to the eventual abandonment of the roost, which as previously discussed would lead to a site level impact to the species encountered.

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

Without the implementation of the mitigation and avoidance measures as described within this licence application, there would be the potential for a site-level adverse impact upon the bat species present within the structure, as well as the roost locations, access points and commuting and foraging habitat in proximity to the site.

With the recommendations for safe working practices as described, there is considered to be a low-level risk of disturbing individual bats. Whilst the existing roosts will be subject to destruction, it is considered that the integration of new roosting provision in locations on site in close proximity to the confirmed roost locations will ensure the roosting potential will be present post-works, and thus the works will result in a net-neutral impact. When considered in tandem with the erection and permanent retention of two receptor roosts within the site, the recommended lighting plan and the retention commuting pathways to facilitate movement of bats around the site, the proposals will result in a net-positive impact.

With the proposed mitigation measures, the impact upon commuting and foraging habitat is considered to be net positive; see **Figures D6.1 – D6.2** below for the location of key commuting and foraging assets.

[3] See: https://cieem.net/resource/uk-bat-mitigation-guidelines-2023/



Figure D6.1 – Location of roosts, commuting pathways and foraging areas within site at a scale of 1:500

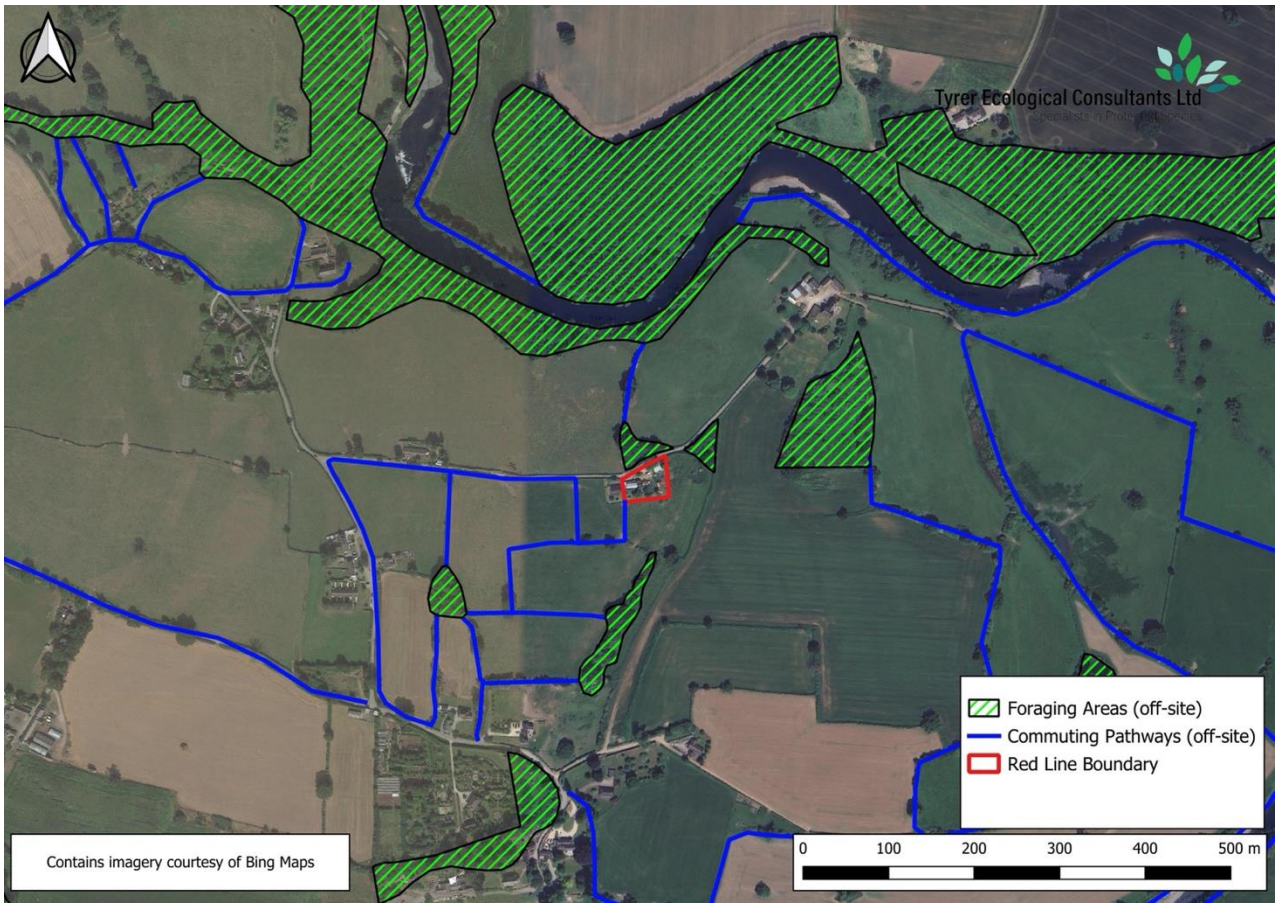


Figure D6.2 – Location of commuting pathways and foraging areas around site at a scale of 1:5000

Through the integration of mitigation measures into the replacement structure post-works, no post-development interference impacts will occur.

Based on the combination of the above impact assessments, the predicted scale of impact upon the species present at the site is considered to be neutral – positive; commuting pathways will be retained, where possible and reconstituted post-development if this is not the case, no lighting will be directed at mitigation measures or key flight lines, mitigation will be integrated back into the structure at locations near to where the existing roosts are located and demolition will occur under ecological supervision.

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

The Ecologist will provide an induction (toolbox talk) on possible bat presence to the contractors prior to works commencing on site. The NRW Mitigation Licence will be kept on site for the duration of the work. Prior to any work being undertaken the presence / absence bats will be established by a bat licensed (or accredited agent) ecologist named on the licence application, undertaking a detailed investigation of features which have/may be used by bats, which will include endoscopic examinations wherever opportunities for bats exist. This will extend away from the specific roost locations to other areas where there is a moderate risk that bats may be encountered.

Two tree-mounted bat boxes will be erected at suitable locations within the site; see **Figure E1** below for the proposed location of the receptor roosts on the existing site plan.



Figure E1 – Proposed location of receptor roosts [ ] over the existing site plan © Willacy Horsewood Architects

Works understood to pose a risk of impacts to bats include: erection of scaffolding around roost locations, by-hand deconstruction of the roost locations, full demolition of the structure host to a bat roost, and high level disturbance internal works carried out prior to demolition, and any vegetation clearance in proximity to the receptor roosts.

A lighting plan has been recommended within the site-associated decision notice; this should take into account the proposed roost provision and commuting pathways and should be signed off by a suitably qualified and licenced bat ecologist.

The demolition of the structure and erection of a replacement building with integrated mitigation measures will ensure that roost provision is maintained well into the future.

The measures proposed will ensure that the favourable conservation status of the species in question is maintained and roost provision will be ensured for years to come. All measures are subject to NRW agreement and will be dedicated for bats and permanent.

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.

Given the roost type and species present (widespread roost type and species), there is no necessity to carry out the works within a certain time period and no constraints are present in relation to Maternity colonies or a Hibernation roost.

Any works to the confirmed roost areas or to other areas of potential will only occur in suitable weather conditions on the advice of the ecologist; this is typically temperatures over 9 degrees Celsius and in suitable wind and precipitation levels.

Given that works may be carried out within the active season of bats, there is potential for bats to be present during the time that works are proposed.

Once the licence is in place, prior to deconstruction of the roost the contractor will provide a safe means of access e.g., cherry picker or scaffolding to allow the ecologist to investigate all roost potential for bat presence within the building. Where crevices are extensive, or where it cannot be conclusively ascertained that bats are absent from a crevice, exclusion devices may be fitted for a period of 3 days and 3 nights, no longer, at the Ecologist's discretion – this is where material is placed over the entrance area(s) of a roost allowing bats a means of escape whilst preventing them from re-accessing. This method will only be adopted if necessary, and exclusion fitted cavities will only be filled in following this process. Further precautionary measures will take place by way of supervision of any works to areas which are known to be or could be used by bats in any part of the buildings by the licenced bat ecologist (or accredited agent).

If bat/s is/are present, if they are the species and numbers contained within the licence, and will be impacted by the proposed works if left in situ, it/they will be hand captured by the ecologist, who will be wearing appropriate gloves, bat/s will be handled to an absolute minimum and immediately placed into a small animal box that is secure and of a type that is used by bat carers/handlers to retrieve and transport bats. Within the box a soft cloth will be provided for bat(s) to shelter, and it/they will be immediately transferred into the respective tree-mounted receptor bat box that will have previously been erected as per Figure E1 previous. Each species of bat will be assigned one of the two receptor roosts; at no time will multiple species be placed in the same receptor roost.

Once it has been established by the ecologist that bat(s) are absent, the deconstruction of the areas of roosting potential will be carried out by hand / hand tools only. Only once these areas have been removed will the structure be allowed to be demolished.

In the unlikely event that bats are found outside of the ecologist's supervision time then the work will immediately cease, and the named ecologist contacted for further advice; contractors will be informed that they should not handle bats or encourage it/them to move. The procedure for safely moving bats as

previously described will then take place by the ecologist; If bat(s) is/are found and it/they are in poor condition or injured it/they will be taken into temporary care by the named ecologist and when fit and healthy subsequently released at the site during favourable weather conditions.

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.

N/A

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..

N/A

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.

Prior to deconstruction of the roost location using hand-tools only, the receptor roosts will be erected as per **Figure E1** previous.

New roosting provision will be integrated into the new structure in the form of two Habibat Integrated Bat Boxes, notably the Habibat 001 Bespoke Brick Facing, to ensure that the provision matches the design and character of the proposed building. These measures will effectively replicate the existing provision which is being lost, and will be installed in locations in close proximity to the existing roost locations to encourage uptake by the bat species identified as being present. See **Figure E2.3.1** for the suggested roost provision.

The roosts will be permanent and dedicated for bats; they cannot be used for any other purpose. Management requirements for the roost(s) are considered to be absent, though it will be the Licensee's responsibility to ensure all new roost access points and building condition remains in favourable condition post-development. The lighting plan will ensure that increased lighting will not be directed at or close to the roost areas nor will it affect nearby foraging places or flight lines. **Figures E.2.3.2 – E2.3.3** indicate the location of the proposed roost provision on the proposed elevation drawings as well as the proposed site plan.

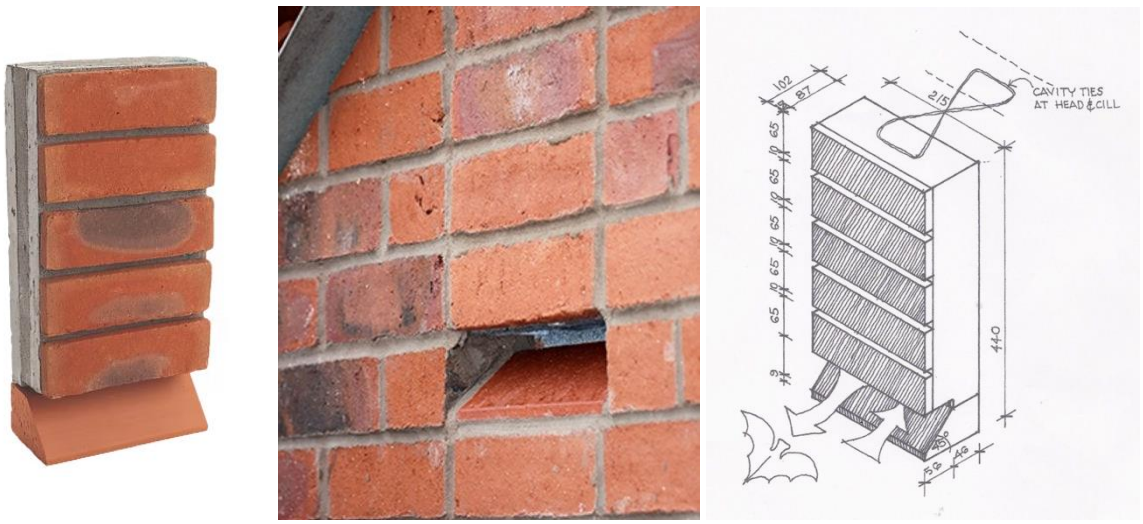


Figure E2.3.1 – Proposed roosting provision © Habibat[4]

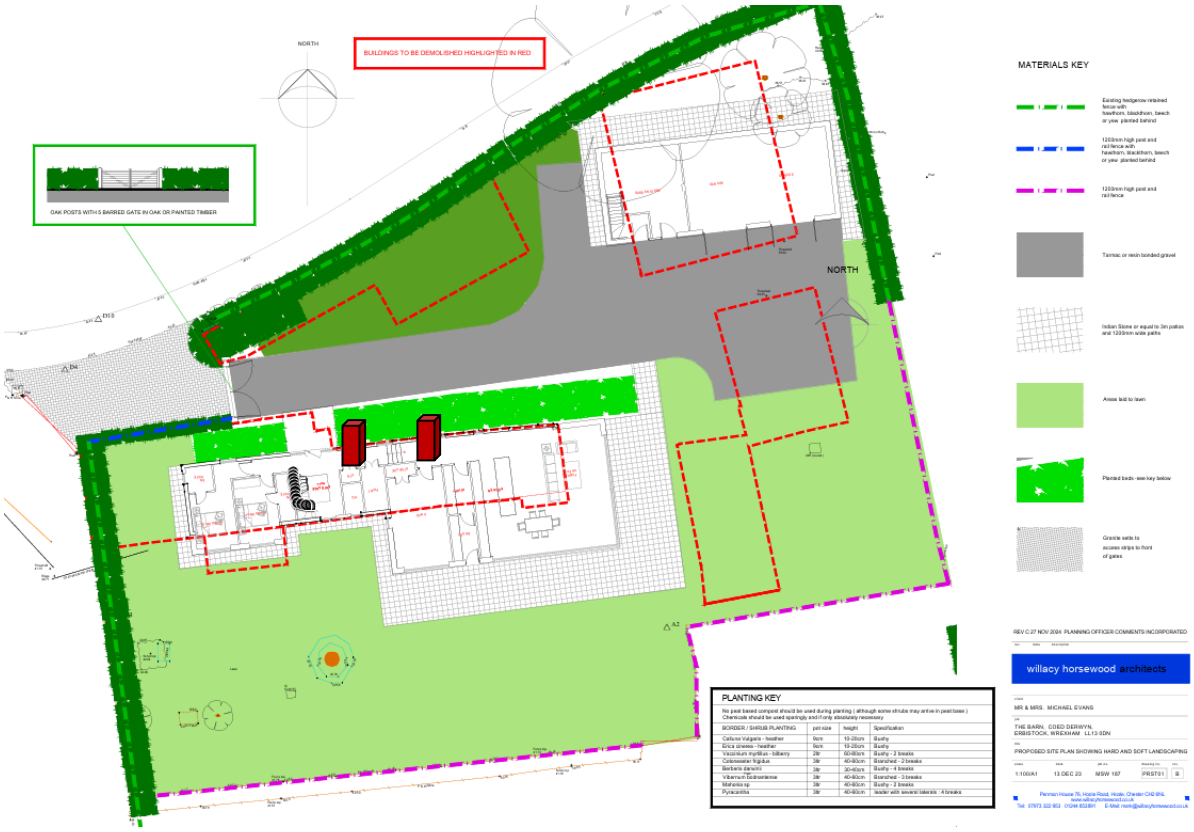


Figure E2.3.2 – Location of Habibat Bat Boxes [ ] over Proposed Site Plan © Willacy Horsewood Architects

[4] https://www.habibat.co.uk/bat-boxes

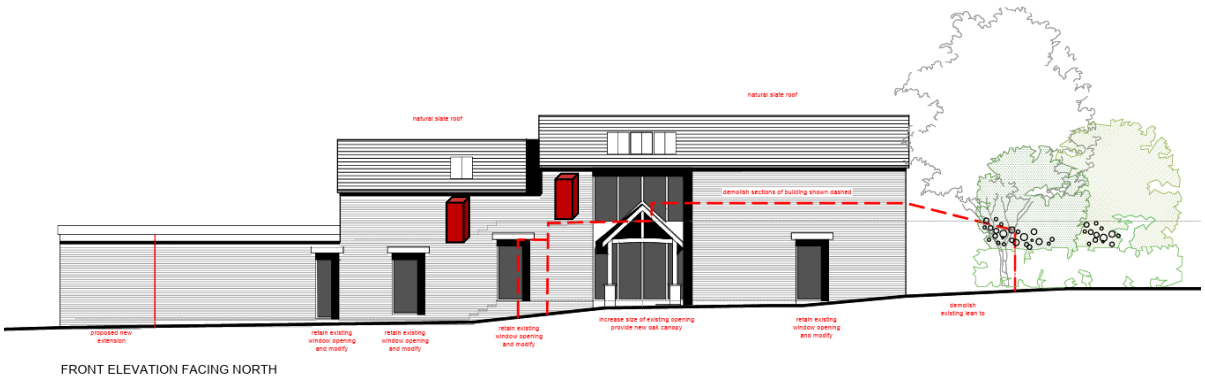


Figure E2.3.3 – Location of Habibat Bat Boxes [▯] over Proposed Site Elevations © Willacy Horsewood Architects

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.

As per **Section D.6**, minimal habitat loss will occur, and key commuting pathways are being retained in the form of the existing hedgerows along the northern boundary. Based on the proposed location of the roost, there will be no increase in the distance between the roosts and areas of favourable foraging habitat, and similar flight paths will be able to be used by bats using the roost provision. As such, no impacts are considered likely to the high value commuting pathways near to site.

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.

See site associated documents (submitted in support of the application on the online application form) as well as the previous Figures **D6.1 – 6.2**, **E1 & E2.3.1 – E2.3.3** for scaled maps of commuting / foraging areas, receptor roosts and proposed mitigation measures.

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

Include measures to ensure compliance with this method statement

Full planning consent has been granted by Cyngor Bwrdeistref Sirol Wrecsam / Wrexham County Borough Council on 19th December 2024 under reference number P/2024/1336.

Condition 8 of the decision notice states:

"8. No development shall commence until a Bat Conservation Plan has been submitted to and approved in writing by the Local Planning Authority. The Conservation Plan shall include, but not necessarily be limited to:

• Build upon the principles outlined in the ecological report;
• The submission of further details including plans of all bat roost retention and compensation proposals. Plans shall clearly illustrate the locations of all retained and proposed entrance/exit points;

• The submission of further details concerning the prevention of injury or killing of bats during construction and post-construction;
• Details of timing, phasing and duration of construction activities and conservation measures;
• Timetable for implementation and demonstrating that works are aligned with the proposed phasing of the development;
• Actions to be taken in the event that previously unidentified species of bat are found;
• The submission and implementation of an approved ecological compliance audit (ECA) scheme to the satisfaction of the LPA. Given the significance of the roost, we advise that the ECA is carried out by an external body. The purpose of the ECA is to evidence compliant implementation of all ecological avoidance, mitigation and compensation works, either proposed or subject to the provisions of reserved matters conditions. The ECA shall identify Key Performance Indicators (KPI's) that are to be used for the purposes of assessing and evidencing compliant implementation of proposals;
• Persons responsible for implementing the works;
• Post-construction monitoring and record dissemination for a period of not less than 5 years;
•Submission of details including plans concerning external lighting together with any light spillage originating from internal locations. This component requirement shall include plans illustrating projected or retained bat emergence points; together with retained or proposed features such as existing and proposed landscaping and vegetation that currently or are planned to be functionally used by bats for foraging/dispersal purposes.

Provisions of the scheme shall accord with the provisions of the Institution of Lighting Professionals and Bat Conservation Trust: Guidance Note 08/18: Bats and Artificial Lighting in the UK. The Conservation Plan shall be carried out in accordance with the approved details."

The above essentially recommends a EPS licence be applied from NRW; the licence and associated documentation is also considered to satisfy all of the necessary points listed in relation to the Bat Conservation Plan. This ensures and legally secures the delivery of mitigation and compensation measures.

Monitoring of the site for a period of two years minimum post-works will be carried out, in line with NRW guidance, secured via the legally binding terms of this EPS licence.

E.4 Mitigation contingencies

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

If at any time the status of the buildings value relative to bats is considered to be higher, then the mitigation will be reviewed and upgraded, NRW will be consulted prior to such amendments being implemented using the appropriate application procedure.

The two receptor roosts proposed to be erected within the suitable trees as detailed previously will act as roosting provision for bats in the event that timescales extend beyond those proposed in Section G.

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

In terms of the risk of transfer of Covid-19 or white nose syndrome (WNS) to bats, measures will be taken to ensure any bats handled during the demolition works are not exposed. This will include ensuring the licenced bat handler and anyone in the immediate vicinity of the existing bat roosts will not be suffering symptoms of Covid-19 or have been recently exposed to people who have recently suffered symptoms.

All will be wearing a mask and clean gloves. This is accordance with guidance issued by CIEEM and The Bat Conservation Trust (October 2020).

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..

If maintenance is required at or near to any roost locations then the owners will be responsible for maintaining access for bats and all associated features; however, if maintenance is required at or close to the roosts then the owners of the building will seek advice from Natural Resources Wales or a bat consultant before undertaking such work.

If the building is to be sold, then mention of the bat roost should be made at all stages, and a copy of the licence should be provided to any tenants or new owners. This will be secured within the deeds of the new properties at handover.

F.2 Population monitoring, roost usage etc.

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

One dusk survey will be undertaken within the period of May – August for a total of two years following the implementation of mitigation. Only licenced surveyors or those accredited on an NRW licence will carry out the updated surveys, and they will utilise suitable equipment (i.e. full spectrum bat detectors, IR camera equipment).

F.3 Post-development mitigation contingencies

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

N/A

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.

Monitoring is secured legally via the licence application; details of the roosts and owner responsibilities will be provided within the property deeds at point of sale.

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.

Based on information provided by the applicant, works to the structure will begin ASAP following granting of the licence. Firstly, this will include the erection of the receptor roost in late June / early July; once this has been erected work will begin to remove the roosting features by hand / using hand tools only in July 2025. Once all areas of roosting potential have been removed under ecological supervision, the structure will be demolished. Following demolition the new building will be constructed, including the integrated mitigation measures proposed. The programme of works has been estimated to take a period of 12 – 18 months.

Following completion of the works, monitoring surveys will be undertaken in the following two years. Based on the programme of works, these will be carried out in May – August 2027 & 2028.

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 – the ownership will not change after works. If the site is sold at any point in the future, then the mitigation will be secured via the legal agreement within this EPS licence as well as by the conditions secured within the planning consent.

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**	 On behalf of Mr Evans	**Date**	3/06/2025
For electronic submissions please insert an electronic signature above or place an x in the box opposite to confirm agreement with the declarations above.			☐
Full name in BLOCK LETTERS	AMY RAINSFORD NSC Planning on behalf of Michael Evans		
Signature of the **Ecologist**		**Date**	03/06/2025
For electronic submissions please insert an electronic signature above or place an x in the box opposite to confirm agreement with the declarations above.			X
Full name in BLOCK LETTERS	KYLEE WILDING		

J References

Credits for source information.

K Annexes

K.1 Pre-existing survey reports
K.2 Raw survey data.