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Dwellings at 38/40 Westminster Road, Moss. Protected Species Survey Report (Bats)

Dwellings at 38/40 Westminster Road
Moss
Wrexham
LL11 6DG

Produced by P J Ecological Solutions
on behalf of Retrospect Limited

August 2025

Version 1

Report by Paul Roberts
Reviewed by Matthew Whitehead

Executive Summary

P J Ecological Solutions were commissioned by Retrospect Limited to undertake a protected species survey of the former dwellings 30/40 Westminster Road, Moss.

The survey was commissioned to ascertain whether the proposed works thereto have the potential to affect protected species, specifically bats, and to make recommendations as appropriate. The proposals are for the demolition of the two former semi-detached dwellings and the construction of three replacement dwellings with associated parking and gardens at the site.

A detailed desk study of the surrounding area and a preliminary roost assessment and nesting bird assessment of the building has been undertaken, in addition to three bat emergence surveys. Following a review of the data recorded during the emergence surveys, several late-season further inspections of the buildings were also undertaken, and some of the droppings found within the buildings were submitted for DNA analysis (see Appendix 2).

The survey results indicate that the building to be demolished is being used as a day roost by individual common pipistrelle bats, by individual soprano pipistrelle bats, and by at least five lesser horseshoe bats, and as a night roost by lesser horseshoe bats. The lesser horseshoe roost day roost is considered likely to be a satellite roost used by the maternity colony in the neighbouring chapel building.

The proposed works will result in the destruction of these roosts and, in the absence of mitigation, have the potential to disturb or cause harm to any bats which are present at the time.

A European Protected Species Mitigation License (EPSML) from Natural Resources Wales will therefore be required before site works can commence.

As a requirement of the license, the works will need to be undertaken in accordance with pre-defined reasonable avoidance measures and suitable compensatory roosting opportunities will need to be provided for those to be lost. The reasonable avoidance measures and mitigation and compensation scheme detailed in Appendix 1 is considered suitable for the project.

As a requirement of the license, a suitably qualified ecologist will need to be appointed by the licensee as the licensed site ecologist for the duration of the project.

N.B: As the potential of the site for roosting bats may change over time, it is recommended that these surveys are updated after two years if development has not yet commenced. Should the proposals change significantly or change to affect areas outside those surveyed, further advice should be sought from a suitably qualified ecologist.

Contents

1 Introduction 3
2 Method 5
2.1 Preliminary Roost Assessment 5
2.2 Bat Emergence Surveys 5
2.3 Late-Season Further Inspections and DNA Analysis 7
3 Results 8
3.1 Preliminary Roost Assessment 8
3.2 Bat Emergence Surveys 15
3.3 Late-Season Further Inspections and DNA Analysis 17
4 Evaluation 19
5 Impact Assessment 20
6 Required Actions 21
6.1 Further Surveys 21
6.2 Mitigation, Compensation and Licensing Requirements 21
Appendix 1: Delivery Information 22
Works to be Undertaken 22
Post-Development Site Safeguard 25
Appendix 2: DNA Results

1 Introduction

P J Ecological Solutions were commissioned by Retrospect Limited to undertake a protected species survey of the former dwellings 30/40 Westminster Road, Moss, Wrexham. LL11 6DG (Grid Reference: SJ30855296; hereafter referred to as 'the site').

The survey was commissioned to ascertain whether the proposed works thereto have the potential to affect protected species, specifically bats, and to make recommendations as appropriate. The proposals are for the demolition of two former dwellings and the construction of three replacement dwellings with associated parking and gardens at the site.

The site is set within a semi-rural position, close to the village of Brynteg to the west and Moss Valley Country Park to the east. Good quality native-species hedgerows and some trees provide connectivity between the site and nearby broadleaved woodlands and watercourses in the area, which will provide good foraging and commuting opportunities for bats in the area.

A detailed desk study of the surrounding area and a preliminary roost assessment and nesting bird assessment of the building has been undertaken, in addition to three bat emergence surveys. Following a review of the data recorded during the emergence surveys, several late-season further inspections of the buildings were also undertaken, and some of the droppings found within the buildings were submitted for DNA analysis. The aim of these efforts/this appraisal is to:

- Identify potential and actual habitat and species constraints pertinent to the development proposals.

- Detail further survey requirements and/or reasonable avoidance measures which should be adhered to during the proposed works, as appropriate.

- Identify opportunities for the proposed development to provide enhancements and add to the biodiversity resource within the site.

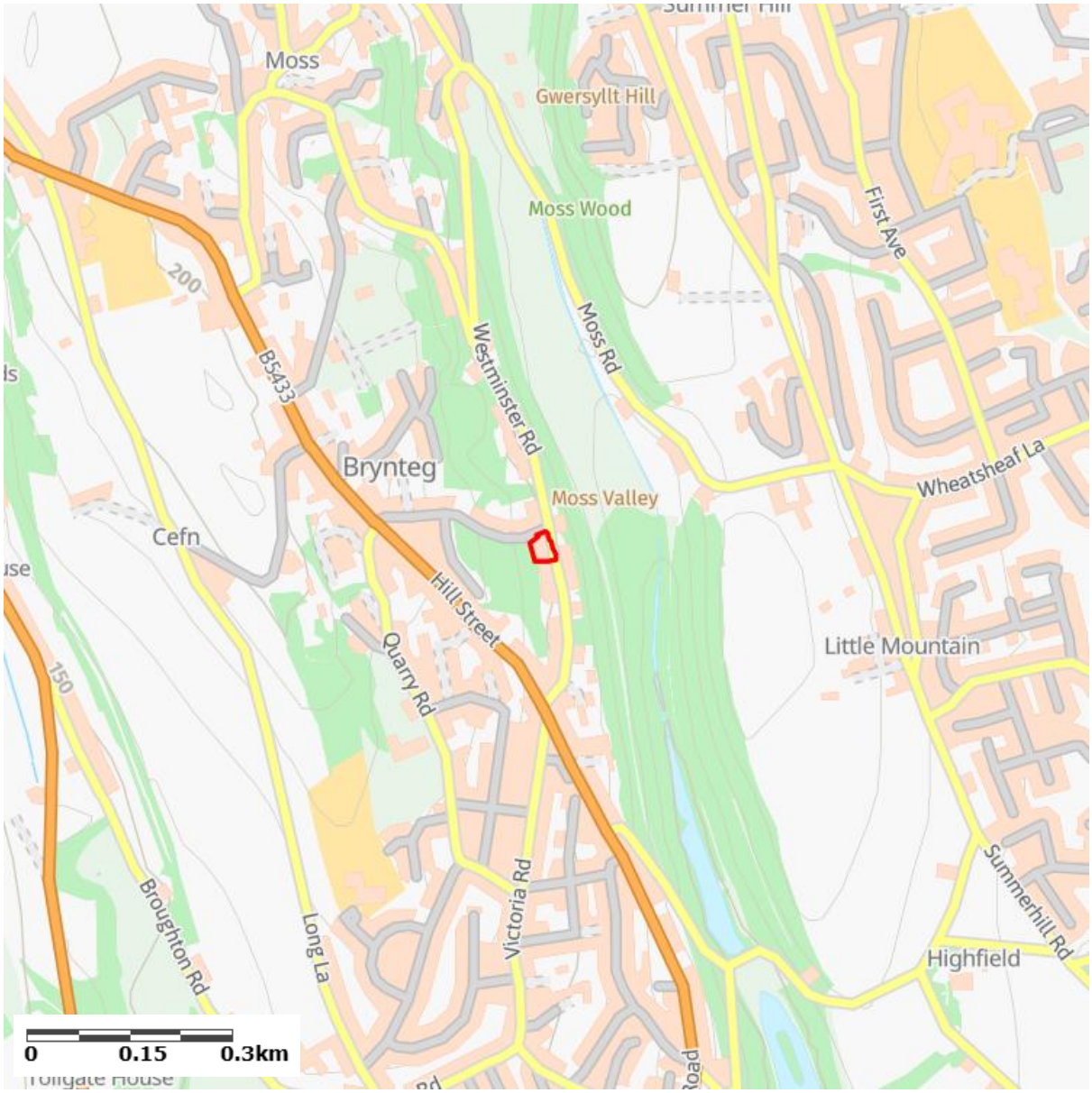


Figure 1.1: A 1:10,000 map view showing the site location and the surrounding habitats.

2 Method

2.1 Preliminary Roost Assessment

A preliminary roost assessment of the buildings was undertaken on the 27th of January 2025 by Paul Roberts UCert (NRW Bat Survey License Number: S094855/1), an experienced ecological consultant familiar with the local area. Potential roosting features were accessed using a suitably tall ladder and inspected using a Clulite CB2-L2 high-powered torch and a Eazyview Tradesman fiberscope. A detailed inspection of each building's exterior and interior was carried out in accordance with the methodology prescribed within the Bat Conservation Trust's (BCT) Good Practice Guidelines (2023). The building was then categorised in accordance with Table 4.1 of that document.

The inspection was undertaken in accordance with the advice provided in the document *Guidance on Ecological Survey and Assessment in the UK During the COVID-19 Outbreak (Version 4)*, produced by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2021).

2.2 Bat Emergence Surveys

Three bat emergence surveys were carried out in accordance with the methodology prescribed within *Bat Surveys for Professional Ecologists* (Bat Conservation Trust, 2023). The surveys were undertaken by Paul Roberts, assisted by Aidan Nicklin, using an EchoMeter Touch 2 Pro bat detectors, as well as two Sony FDR-AX100 infrared cameras, each of which was connected to a Pettersson M500-384 or Pettersson U384 bat detector (see Figures 2.1 and 2.2). The surveys were undertaken under the conditions detailed in Table 2.1.

Table 2.1: The details of the emergence surveys undertaken.

Type of Survey	Date and Time	Weather Conditions at Sunset/Sunrise
Emergence Survey	7th May 2025 20.00 – 22.50	Sunset Time: 20.51; 13.5°C, Dry, Negligible Wind, 60% Cloud Cover
Emergence Survey	17th June 2025 21.10 – 23.12	Sunset Time: 21.41. 16.5°C, Dry, Negligible Wind, 40% Cloud Cover
Emergence Survey	17th July 2025 20.45 – 23.15	Sunset Time: 21.28. 17°C, Dry, Negligible Wind,10% Cloud Cover

The emergence surveys were undertaken in May, June and July, in dry and calm conditions, when the temperature at sunset was above 10°C, all of which is in accordance with the good practive guidelines provided in Section 7 of the BCT's *Bat Surveys for Professional Ecologists* (2023). The surveys commenced at least 30 minutes before sunset and continued until at least 90 minutes after sunset. As such there are no limitations associated with the timing and weather conditions of the surveys.

N.B: Bat emergence surveys can only give a snapshot of bat behaviour at the time of the survey. As the potential of the site for roosting bats may change over time, it is recommended that bat surveys are updated after two years if development has not yet commenced.

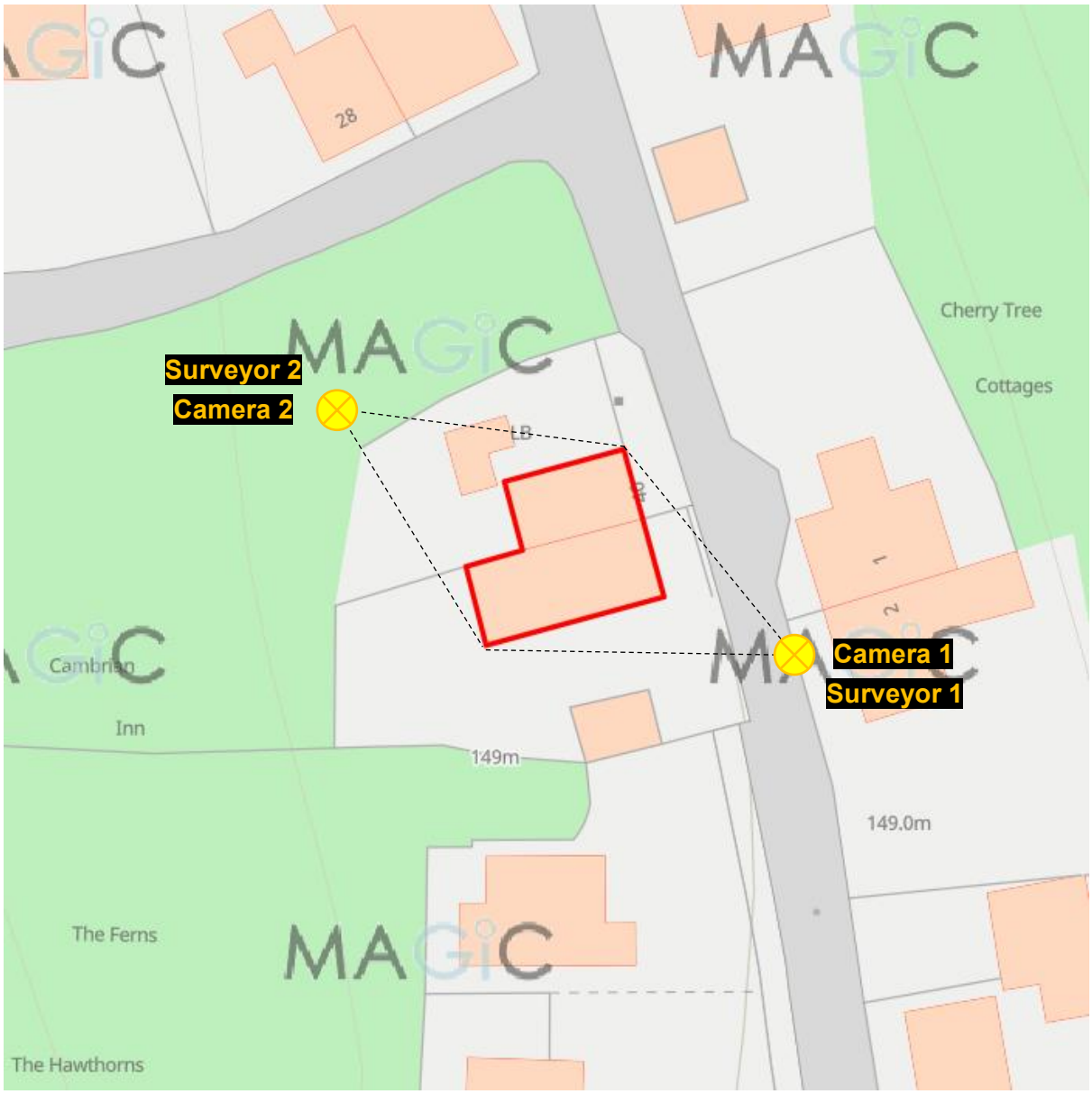


Figure 2.1: A 1:500 map view showing the positions of the surveyors/equipment during the emergence survey. The building to be demolished is shown in red; the outbuildings shown on the map are no longer present.



Figure 2.2: The field of view of each of the Sony FDR-AX100 cameras used at the darkest part of the survey. All footage was reviewed in real-time using the open-source PotPlayer software. All sonograms were manually reviewed using the SonoBat 30 UK bat call analysis software.

2.3 Late-Season Further Inspections and DNA Analysis

Following a review of the footage and bat calls recorded during the emergence surveys undertaken, it was decided that further inspections of the building were necessary. This decision was made because no lesser horseshoe bats (*Rhinolophus hipposideros*) had been observed emerging from the building during the surveys, despite a significant number of droppings, characteristic of those produced by lesser horseshoe bats, being found throughout both dwellings during the preliminary roost assessment.

The first inspection was undertaken on the 21st of August 2025, by Paul Roberts and Matthew Whitehead. The second inspection was undertaken on the 25th of August 2025 by Paul Roberts. During both inspections, the entirety of the interior spaces of both dwellings was carefully searched for evidence of roosting bats (particularly lesser horseshoe bats).

At the same time, several of the droppings within the building were collected and submitted to ADAS (RSK ADAS Ltd) for DNA Analysis (see Appendix 2 for the results).

N.B: As the building is easily accessible and has clearly been broken into previously, it was not possible to leave a static (unsupervised) bat detector on site for a period of passive monitoring in this case.

3 Results

3.1 Preliminary Roost Assessment

A description of the dwellings is provided in Table 3.1, below.

Table 3.1: The former dwellings.

Exterior Fabric and Features	
Structure	• The former dwellings – each a self-contained semi-detached house – together comprise a single building. The building is a three-storey, almost square structure, which features a symmetrically pitched hip roof. The dwellings are of like construction and in like condition, so are considered as a single building for the purpose of this description.
Walls	• The walls of the building are constructed of dressed sandstone and are generally in a good state of repair; however, some notable crevices were noted within the mortar joints along the wall tops.
Roof	• The roof of the building is constructed of slate tiles and features angled ridge and hip tiles and is in a poor state of repair, with numerous slipped and lifted tiles, several gaps in the mortar along the ridge, and an area of significant damage where a former extension to the rear (west) of the building has now been removed. There are roof lights on the rear and front of the building.
Soffits, fascias and bargeboards	• The dwelling's roofline comprises wooden fascias fitted directly to the wall surfaces, which support rainwater goods, beneath which gaps are apparent in some areas.
Windows, doors, and other points of access	• The dwelling's windows and doors are mostly present or blocked/boarded, except for a single open doorway into the rear of the more southerly dwelling, and a broken window into the first-floor area of the more northerly dwelling. Access to the building may also be achieved via the area of extensive damage where the former extension to the rear of the building has been removed.
External lighting	• There are some streetlights outside of the neighbouring dwellings which to the south of the site. The area to the north and west of the site is generally dark throughout nighttime hours.
Vegetation upon or immediate to the building	• There is no significant vegetation growth onto or immediate to any part of the building.
Interior Fabric and Features	
Structure	• The dwellings are each self-contained, with no purposeful access between the two (although gaps were noted atop the partition wall within the roof void). Each of the dwellings contain their own ground floor and first floor areas, as well as second floor areas within the slope of the hipped roof. Each of the dwellings also feature their own cellar areas and have access to one-half of the shared roof void (which sits atop the uppermost part of the roof only).
Roof Structure, Roof Lining and Roof Void	• As both dwellings feature a second floor 'room in the roof', and as the roof is hipped, the roof void atop the roof is small. The roof within the void is supported by a traditional cut timber frame and is lined with bituminous felt.
Light Penetration and Weather proofing	• There is significant natural light and draught entry into the dwellings' ground floor and first floor areas from the gaps above the boarded/open doorways and broken windows. Only limited natural light ingress could be seen within the roof void, with no obvious

	points of direct 'fly-through' access to the space apparent; however, the loft hatch to the below spaces are open or missing.
Evidence of Roosting Bats or Nesting Birds	
Evidence of bats or bat roosts	• A significant number of droppings, characteristic of those produced by lesser horseshoe bats, were found throughout both dwellings, including a large accumulation within the building's roof void area.

Summary: A significant number of droppings, characteristic of those produced by lesser horseshoe bats, were found throughout both dwellings. As such, it was considered highly likely that the building supports a day and/or night roost of that species.

Further, based upon the numerous potential roosting features present throughout the building's roof and roofline, and the numerous points via which bats could gain access to each of the building's interior spaces, the building was categorised as having high potential to support further bat species also.

Photographs showing the above features and findings are included below (see Figures 3.2 to 3.13).



Figure 3.2: The south elevation of the building.



Figure 3.3: The north elevation.



Figure 3.4: The north and west elevation of the former dwelling



Figure 3.5: A window with a gap providing access into the former dwelling.



Figure 3.6: A broken window providing a potential access point for bats.



Figure 3.7: Showing lifted tiles



Figure 3.8: Showing a broken tile.



Figure 3.9: Showing an access point to the rear of the former dwellings



Figure 3.10: Showing gaps underneath the fascias



Figure 3.11: Showing the bat droppings which suggest a feeding perch and were sent for DNA analysis.



Figure 3.12: Showing the bat droppings on the second floor of the former dwellings.



Figure 3.13: Showing scattered bat droppings on the second floor of the former dwellings.

3.2 Bat Emergence Surveys

7th of May 2025: During the first emergence survey, a single common pipistrelle (*Pipistrellus pipistrellus*) bat was observed emerging from beneath the fascia board which runs along the building's south elevation (see Figure 3.14), at 20.57, before flying eastwards towards the treeline.

In addition, a soprano pipistrelle bat (*Pipistrellus pygmaeus*) was observed emerging from beneath the fascia board which runs along the building's west elevation (see Figure 3.15), at 21.07.

No other bats were observed emerging from the building on this occasion.

During the survey, further common pipistrelle bats were recorded in the vicinity of the site, mostly amongst the treeline and within the recently cleared land to the rear of the site, at 21.11, from 21.13 until 21.16, at 21.28, at 21.37, at 21.52, at 21.53, at 21.59, at 22.03, at 22.09, and at 22.14, and further soprano pipistrelle bats were recorded in the vicinity of the site, amongst cleared land, at 21.27 and 21.48.

In addition, a common noctule bat (*Nyctalus noctula*) was recorded in the vicinity of the site at 21.59 and at 22.26, and a brief set of calls from a lesser horseshoe bat were recorded at 21.47.

No other bats were recorded or observed during the survey.

***17th of June 2025*:** During the second emergence survey, a single soprano pipistrelle bat was observed emerging from beneath the fascia board which runs along the building's west elevation (see Figure 3.15), at 22.14.

No other bats were observed emerging from the building on this occasion.

During the survey, common pipistrelle bats were recorded in the vicinity of the site, almost constantly, from 22.08 onwards, and common noctule bats were recorded in the vicinity of the site at 22.13 and at 22.41.

No other bats were recorded or observed during the survey.

***17th of July 2025*:** During the third emergence survey, a single common pipistrelle bat was observed emerging from beneath the fascia board which runs along the building's south elevation (see Figure 3.14), at 21.34, before flying eastwards towards the treeline.

In addition, a soprano pipistrelle bat (*Pipistrellus pygmaeus*) was observed emerging from beneath the fascia board which runs along the building's west elevation (see Figure 3.15), at 21.44.

No other bats were observed emerging from the building on this occasion.

During the survey, further soprano pipistrelle bats were recorded in the vicinity of the site at 22.07, at 22.13, and at 22.16; further common pipistrelle bats were recorded in the vicinity of the site from 21.41 until 21.43, at 21.58, at 22.06, and at 22.11; and lesser horseshoe bats were recorded in the vicinity of the site at 22.13, at 22.14, and at 22.30.

No other bats were recorded or observed during the survey.



Figure 3.14: The fascia board from beneath which the common pipistrelle bats were observed emerging.



Figure 3.15: The fascia board from beneath which the soprano pipistrelle bats were observed emerging.

3.3 Late-Season Further Inspections and DNA Analysis

Following a review of the footage and bat calls recorded during the emergence surveys undertaken, it was decided that further inspections of the building were necessary. This decision was made because no lesser horseshoe bats had been observed emerging from the building during the surveys, despite a significant number of droppings, characteristic of those produced by lesser horseshoe bats, being found throughout both dwellings during the preliminary roost assessment.

During the first inspection, a total of five lesser horseshoe bats were observed day roosting within the upper floors of the building, and during the second inspection, a total of four lesser horseshoe bats were observed day roosting within the upper floors of the building.

At the same time, several of the droppings within the building were collected and submitted to ADAS (RSK ADAS Ltd) for DNA Analysis. This decision was made because a collection of droppings, separate from the rest, were found within the middle floor of one of the dwellings, together with a collection of moth wings (below a light fitting located on the first floor of the southmost dwelling), which was considered indicative of a feeding perch/night roost.

Analysis of the droppings identified them as belonging to lesser horseshoe bats (see Appendix 2).

N.B: As the building is easily accessible and has clearly been broken into previously, it was not possible to leave a static (unsupervised) bat detector on site for a period of passive monitoring in this case.

4 Evaluation

All species of British bat are afforded full protection under Schedule 5, Section 9 of the *Wildlife and Countryside Act 1981* (as amended), and under Schedule 2 of the *Conservation of Habitats and Species Regulations 2010* (as amended). Under these acts, it is an offence to deliberately or recklessly disturb, capture, injure or kill bats; impair their ability to survive, breed, reproduce, hibernate or migrate; affect significantly the local distribution or abundance of the species to which they belong; or damage or destroy a breeding site or resting place of that species.

The survey results indicate that the building to be demolished is being used as a day roost by individual common pipistrelle bats, by individual soprano pipistrelle bats, and by at least five lesser horseshoe bats, and as a night roost by lesser horseshoe bats. The lesser horseshoe roost day roost is considered likely to be a satellite roost used by the maternity colony in the neighbouring chapel building.

The proposed works will result in the destruction of the identified roosts and, in the absence of mitigation, have the potential to disturb or cause harm to any bats which are present at the time. Suitable compensatory roosting opportunities will therefore need to be provided, and the works will need to be undertaken in accordance with suitable reasonable avoidance measures.

***A bat development licence from Natural Resources Wales will be required before site works can commence*.**

The surveys were not affected by any material limitations.

5 Impact Assessment

The proposed works will result in the destruction of the identified roosts and, in the absence of mitigation, have the potential to disturb or cause harm to any bats which are present at the time. Further, should any new artificial lighting associated with the development be allowed to spill onto any of the hedgerows, treelines or other linear features around the site, or onto the compensatory roosts to be created, or onto flightlines thereto/therefrom, their utility for roosting, foraging or commuting bats could be adversely affected.

Common pipistrelle bat populations and soprano pipistrelle bat populations are both showing signs of recovery across the UK, although their status is less clear in Wales specifically (NBMP, 2024). As such, and due to the low number of bats involved and the relative local abundance of the species, the loss of the identified roosts of these species, even in the absence of mitigation/compensation, would be expected to have an adverse ecological impact of only low local significance (see Bat Mitigation Guidelines, Table 6.1; English Nature, 2004).

However, whilst lesser horseshoe bat populations are showing signs of both long-term and short-term recovery across both the UK and Wales specifically (ibid), they are still considered a ‘rarer’ species and are listed within Annex II of the Habitats Directive. As such, the loss of identified roost, in the absence of mitigation, would have an adverse ecological impact of moderate local significance, although only low regional significance (see Bat Mitigation Guidelines, Table 6.1; English Nature, 2004).

6 Required Actions

6.1 Further Surveys

As the potential of the site for roosting bats/nesting birds may change over time, it is recommended that these surveys are updated after two years if development has not yet commenced. Should the proposals change significantly or change to affect areas outside those surveyed, further advice should be sought from a suitably qualified ecologist.

6.2 Mitigation, Compensation and Licensing Requirements

The survey results indicate that the building to be demolished is being used as a day roost by individual common pipistrelle bats, by individual soprano pipistrelle bats, and by at least five lesser horseshoe bats, and as a night roost by lesser horseshoe bats. The lesser horseshoe roost day roost is considered likely to be a satellite roost used by the maternity colony in the neighbouring chapel building.

The proposed works will result in the destruction of these roosts.

A European Protected Species Mitigation License (EPSML) from Natural Resources Wales will therefore be required before site works can commence.

As a requirement of the license, the works will need to be undertaken in accordance with pre-defined reasonable avoidance measures and suitable compensatory roosting opportunities will need to be provided for those to be lost. The reasonable avoidance measures and mitigation and compensation scheme detailed in Appendix 1 is considered suitable for the project.

As a requirement of the license, a suitably qualified ecologist will need to be appointed by the licensee as the licensed site ecologist for the duration of the project.

Appendix 1: Delivery Information

Works to be Undertaken

Capture and Exclusion

***Timing of Works*:** The demolition of the building will be undertaken during favourable weather conditions and outside of the bat summer roosting period (that is, during the months of October – April), when bats are less likely to be present. No works will be undertaken prior to this period, and the demolition will be completed prior to the end of this period.

To avoid encountering torpid bats in roof structures, these works will be undertaken during periods when temperatures have not dropped below 8°C over four consecutive days and nights. Alternatively, should the works to the roof and the soft strip of the building be delayed until the winter period, when such favourable conditions are unlikely, the preceding autumn period will be used to make potential hibernation sites within the works area unfavourable for winter use.

Site Induction and Toolbox Talk: The licensed ecologist or their accredited agent (hereafter referred to as 'the ecologist') will provide a 'toolbox talk' to all contractors involved with works which could affect bats, prior to the commencement of those works. All site workers will be briefed on the legal status of bats, the likely places to find them, the working practices required to minimise and avoid disturbing or causing harm to bats (e.g., the procedure required for removing roofing material, etc.) and the action to be taken if bats are encountered during the works. All site workers will be made aware that in the event of any bats being found or suspected when the ecologist is not on site, all works must cease in the affected area until appropriate expert advice has been sought from the ecologist or NRW. A copy of the NRW licence and the Bat Licence Method Statement will always remain available on site and a summary sheet of guidance will be given to the builders and contractors working on the site.

***Supervision of Works/Soft Strip*:** The ecologist will be in attendance during the removal of the building's roof, roof structure and roofline features, and during any prior works within the building's interior spaces. No other works will be undertaken within the building until the soft strip of the roof has been completed. Prior to the commencement of these works, the underside of each feature to be removed will be inspected by the ecologist using a high-powered torch and endoscope, to determine whether any bats are present, as far as is possible.

Roofing material and/or associated timbers will be lifted off vertically, rather than rolled, and checked on its underside to ensure that no bats are clinging thereto prior to discarding/storing it. This will minimise the chance of any bats present being killed/injured. This work will be undertaken using hand tools only, (i.e., picks, crowbars, slate rippers, bow saws etc.).

The ecologist will remain available on an 'on-call' basis during all subsequent stages of the works to deal with any unexpected encounters with bats.

***Bat Exclusion*:** If, during the pre-commencement inspection, any cavities are encountered within which the absence of bats cannot be confidently determined, these will be fitted with one-way exclusion devices, so that bats can only exit and not re-enter the cavities. The excluder will remain in place over seven consecutive days and nights during which temperatures have not dropped below 8°C, and then will be checked again immediately prior prised open and subsequently demolished/filled. The excluder will comprise either a plastic pipe with a 26mm bore, facing slightly downwards (to avoid water ingress), projecting at least 100mm from the wall, or a close-fitting Perspex sheet or a collapsible tube or bag fitted over

the potential roost site. The exclusion devices will be fitted between October and April, when there will be no heavily pregnant females or dependent young present.

***If Bats are Encountered*:** If bats are encountered during supervised works, works will stop allowing the bat to move of its own accord. As it is not permissible to handle lesser horseshoe bats, if a lesser horseshoe bat is found during any of the pre-commencement checks, or at any other time during the works, and fails to move away, the works will be delayed until it has done so. If any other species of bat fails to move away, the ecologist will capture it with thin-gloved hands or a hand net and place it in a draw string cloth bag. Removed bats will then be transferred into the pre-installed bat box (see above). This should allow the bat(s) to settle in a safe place for the remainder of the day, and to emerge safely in the evening. If a bat in torpor is encountered, it will be left be left undisturbed in-situ until spring if possible and only moved as a last resort. If it is necessary to move a bat in torpor, then this will be done when temperatures are above 8°C and to a hibernation box located nearby.

If a bat is discovered at other, unsupervised times when the ecologist is not present, work will cease immediately and the bat(s) will be covered by the last object removed (so long as there is no risk of crushing), and the ecologist will be consulted for advice and attendance at site. Associated and nearby coverings will also be replaced if the bat(s) is/are not completely or only just covered. Bat(s) which have not moved of their own accord by the arrival of the ecologist will be rescued by the ecologist using the method described above. If a grounded bat is found, it will be covered by a cardboard box until the ecologist arrives. Any injured bats found will be immediately taken into care. If it is not possible to contact the ecologist, the Natural Resources Wales Species Protection Officer must be contacted immediately, and their advice sought. Builders, contractors, and other unlicensed personnel are explicitly forbidden to handle bats.

Bat Roosts and Habitat

In-Situ Retention of Roost(s)

The identified roosts will be destroyed by the proposed works.

Modification of Existing Roost(s)

The identified roosts will be destroyed by the proposed works.

New Roost Creation

Compensatory roosting opportunities for those to be lost will be provided in the form of a bespoke ‘bat house’ which is to be constructed as a standalone structure to the west of the proposed dwellings. This will comprise a block-built structure which will be built into the slope of the hill which ascends to the west, which will feature a single-pitch roof, also ascending to the west.

The structure will internally measure ≥5m in length (north-to-south) x ≥3m in width (east-to-west) x ≥2m in height (from roof to floor height at the lowest part of the roof). The roof will be constructed of slate tiles, will be supported by a cut frame of rough-sawn timbers, and will be lined with 1F bituminous felt.

Bat access, suitable for lesser horseshoe bats, will be provided in the form of a ‘letterbox-style’ ‘fly-through’ access within the north-end wall, which will measure 300mm (width) x 200m (height), which will be sited 1.5m from ground level and be internally fitted with a suitable cowl or baffle to inhibit natural light or wind ingress. Human access will be provided in the form of

a short side door which will be kept locked (the whole of the building will not be used for any other purpose than to support roosting bats).

Internal crevice-roosting opportunities, suitable for use by both common pipistrelle bats and soprano pipistrelle bats (in addition to further species) will be provided via the erection of a Vivara Pro Beaumaris WoodStone Bat Box (Midi) upon the internal face of the south-facing wall (immediately below roof level). Further crevice-roosting opportunities will be provided via the incorporation of 1 No. Vivara Pro Build-In WoodStone Bat Tube into the south-facing side elevation of each of the three dwellings to be constructed.

To ensure that there is no interruption in roosting provision at the site, the compensatory roosting provision is to be delivered prior to the demolition of the dwellings.

Maintenance of and/or Modification of New and Existing Habitat

To ensure that the compensatory bat roosts to be provided and the flightlines thereto/therefrom will not be affected by any post-development interference, both a conservation plan/mitigation statement and sensitive lighting scheme will be submitted to the County Ecologist for approval prior to the commencement of works. The proposed development will then proceed in strict accordance with the approved plans.

Mechanisms for Ensuring Delivery of Mitigation and Compensation Measures

Delivery will be implemented by the owners of the site through a Natural Resources Wales European Protected Species licence, which will be issued conditional to the recommendations outlined in this report. To fulfil their reporting obligations under the Habitat Directive, the licensee will provide a report, no more than four weeks after the licence expires, detailing findings of any bats encountered during the works, together with the measures taken and outcomes in terms of recovery of and maintenance of the population.

Compliance monitoring will be undertaken by the ecologist as part of their responsibilities to the licensee. The ecologist will be responsible for (i) defining appropriate key performance indicators that will inform an inspection, (ii) defining what evidence will be required to inform inspections, (iii) determining the minimum number of assessment visits required to demonstrate compliance, and (iv) progressing required remedial or contingency actions identified during audit back to the developer and NRW. It will be the licensee's responsibility to ensure that suitable access to the site and suitable funds are made available for this work.

Mitigation Contingencies

The building will be inspected immediately prior to the works to ensure that no bats are day roosting within the works area at the time. It is considered unlikely that any bats will be found during this inspection, due to the proposed timing of the works. If any bat species not previously recorded are found during the pre-works inspection, or at any other time, discussions will take place with an NRW Species Officer with regards how to proceed and to establish whether amendments to the license or additional roosting facilities will be required.

Additionally, reasonable avoidance measures will be adopted to avoid harm to nesting wild birds. The legal status of nesting birds in Wales and the procedure to follow if an active nest is discovered during the works will be included within the toolbox talk to be provided to all site contractors. If any active nests are found at time during the works, all works within 5m of the identified nest (or which might otherwise cause disturbance of harm to its occupants) will be discontinued and a suitable no-works zone will be established around the nest until it has been established that all the chicks have fledged. The delay caused by such an occurrence may require an amendment to the license, as the timing of works may be affected.

N.B: To avoid accidental harm to bats, any new roofs to be installed will be lined with 1F bituminous felt, and not any kind of breathable roofing membrane.

Post-Development Site Safeguard

Habitat/Site Management and Maintenance

The licensee will ensure monies are secured for the site monitoring for a period of up to 5 years, and for post-development mitigation contingencies, as necessary. The licensee agrees to maintain the bat roosting features to be created. Management and maintenance (including remedial action) of the new bat roosting features will be the responsibility of the licensee. Any requirements for repairs or modifications to those features will be identified (by the ecologist) as part of the scheduled monitoring work. Should the buildings be sold, the purchasers must be made aware of the purpose of the bat roosting features and the legislation pertaining thereto. All documentation relating to the presence of bats will be retained by the licensee and passed on to any new owner in the event of the site being sold.

Population Monitoring, Roost Usage, Etc.

Future monitoring of the use of the site will be carried out by the ecologist in Years 1 and 3 post-completion of works. Internal inspections of the bat boxes and bat house will be undertaken to search for evidence of roosting bats. If necessary, further emergence surveys will be undertaken.

Post-Development Mitigation Contingencies

The building to be demolished is being used as a day roost for at least one common pipistrelle bat, at least one soprano pipistrelle bat, and at least five lesser horseshoe bat. Therefore, this mitigation scheme will be judged to have been successful once it has been established that all these species are continuing to roost at the site.

If the above is not achieved, the design of the roosting provision and flightlines on-site will be re-examined and, following consultation with NRW, alterations made as necessary.

Mechanism for Ensuring Delivery of Post-Development Works

There is no Section 106 agreement. The applicant agrees to maintain the bat roosting features to be retained and created as detailed. Should the buildings be sold, the purchasers must be made aware of the purpose of the bat roosting features and the legislation pertaining to the roosts. Monitoring and reporting will be undertaken by the ecologist, following instruction by the applicant, who will bear ultimate responsibility therefor.

Appendix 2: Results DNA Sequence Analysis

Client:

Paul Roberts
PJ Ecological Solutions

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Sample ID:	**6163432-491**		
Client Identifier:	38/40 Westminster Road	**Sample Description:**	Container of intact droppings
Date of Receipt:	29/08/2025	**Material Tested:**	Singular dropping processed

Determinant	Result (closest match)	Method	Date of DNA Sequence Analysis
Cytochrome oxidase subunit 1 (COI) DNA sequence	***Rhinolophus hipposideros***	DNA extraction from singular dropping followed by PCR amplification of a short fragment of the COI gene, DNA sequencing and comparison to a database of known DNA sequences for species identification	04/09/2025

Sequence Alignment* **Sequence Identity** 199/199 (100%)

```
Query  1    ATTGGAGGCTTTGGCAACTGACTGGTTCCCTTGATAATCGGTGCACCCGACATAGCATTC  60
            ||||||||||||||||||||||||||||||||||||||||||||||||||||||||||||
Sbjct  110  ATTGGAGGCTTTGGCAACTGACTGGTTCCCTTGATAATCGGTGCACCCGACATAGCATTC  169

Query  61   CCACGTATGAACAATATAAGCTTCTGACTCCTACCCCCCTCTTTCCTACTTCTATTGGCC  120
            ||||||||||||||||||||||||||||||||||||||||||||||||||||||||||||
Sbjct  170  CCACGTATGAACAATATAAGCTTCTGACTCCTACCCCCCTCTTTCCTACTTCTATTGGCC  229

Query  121  TCATCTATGGTTGAATCTGGTGCTGGAACCGGCTGAACTGTTTACCCCCCTTTAGCGGGA  180
            ||||||||||||||||||||||||||||||||||||||||||||||||||||||||||||
Sbjct  230  TCATCTATGGTTGAATCTGGTGCTGGAACCGGCTGAACTGTTTACCCCCCTTTAGCGGGA  289

Query  181  AACCTGGCCCACGCAGGAG  199
            ||||||||||||||||||
Sbjct  290  AACCTGGCCCACGCAGGAG  308
```

Report Prepared by:	**Harriet Kitchener**	**Report Issued by:**	**Dr Helen Rees**
Signed:	*hkitchener*	**Signed:**	
Position:	**Research Scientist**	**Position:**	**Director: Biotechnology**
Date of preparation:	**04/09/2025**	**Date of issue:**	**04/09/2025**

**DNA sequence alignment for the test sample (Query) matched to a known sequence (Sbjct).*
[$]The identity or percentage match of the two sequences (ideally 100%).

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