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Dusk Survey Results

September 2025

Project Reference: PR-25-0105

Former Methodist Church
Pont-y-blew
Chirk
Wrexham
LL14 5BH

National Grid Reference: SJ 31101 38362



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Executive Summary

As part of a proposed planning application with Wrexham County Borough Council at the Former Methodist Chapel in Pont-y-blew (termed 'the site'), Tyrer Ecological Consultants carried out a Preliminary Ecological Appraisal (PEA) in April 2025.

Following the PEA with included Preliminary Roost Assessment (PRA) which categorised the building as pertaining to '**Low**' bat roost potential, Tyrer Ecological Consultants Ltd were commissioned to undertake the recommended further bat survey; the dusk emergence survey was carried out in June 2025, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

Bats

Based on the results gathered during the 2025 dusk survey, the building is ascertained to be host to a day roost for a two Daubenton's bats.

A European Protected Species (EPS) licence will be required from Natural Resources Wales (NRW) for the proposed development to legally proceed.

A Mitigation Scheme to inform the licence application, and to demonstrate to the Local Authority that the favourable conservation status of the species identified can be maintained, must be provided.

However, at the time of writing detailed proposed plans have not been provided to the author, and no mitigation has been agreed. *Therefore,* ***subject to the receipt of proposed plans*** *and* ***prior to planning being granted, a detailed mitigation scheme must be added to this report,*** *to accompany the proposed retention of the receptor roost.*

See ***Section 6.0*** *of this report for further information.*

Survey Validity

Bat emergence / re-entry surveys are typically **valid for a period of 12 – 18 months**; Natural Resources Wales will typically accept survey data from within the last two years to support a planning or licence application submission, however this is at the discretion of the Local Planning Authority and / or Natural Resources Wales. Should your planning application not achieve consent, or a licence application (where required) not be applied for within this time period, updated surveys may be required.

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1.0 Background & Introduction

1.1 As part of a proposed planning application with Wrexham County Borough Council at the Former Methodist Chapel in Pont-y-blew (termed 'the site'), Tyrer Ecological Consultants carried out a Preliminary Ecological Appraisal (PEA) in April 2025.

1.2 The PEA was commissioned by Blueprint Architectural Services; proposals are understood to involve the conversion of the existing chapel building into a single residence, formation of parking spaces and installation of a septic tank system. See **Figure 1.1** below for a proposed post-development site plan.

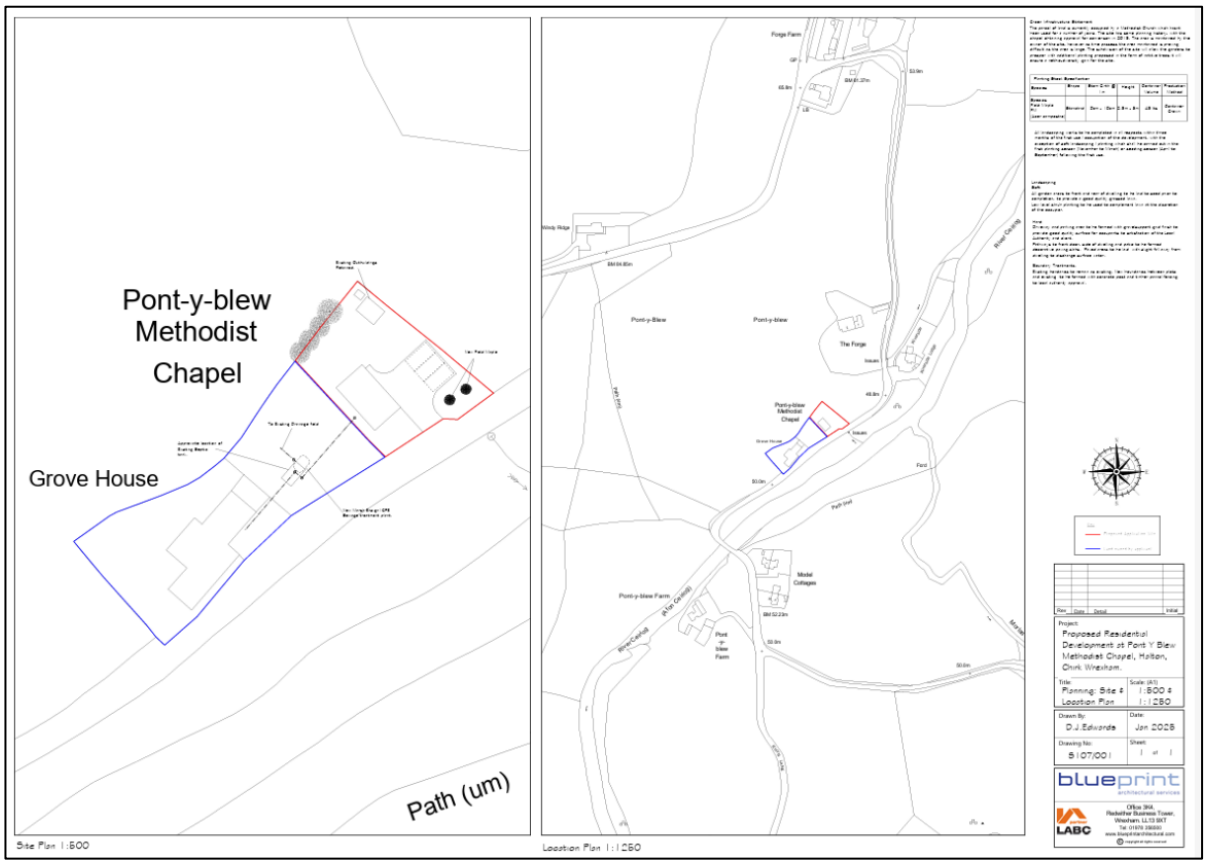


Figure 1.1 – *Proposed post-development site plan (© Blueprint Architectural Services)*

1.3 Included within the PEA was a Preliminary Roost Assessment (PRA) of any built structures and trees on site in relation to bats. Based on the findings of the PRA, the chapel was duly categorised as pertaining to '**Low**' bat roost suitability, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023) (see **Figure 1.2** below for a BCT guidance extract).

Table 7.2. Recommended minimum number of survey visits for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees but unlikely to give confidence in a negative result).

Low roost suitability or PRF-I	Moderate roost suitability	High roost suitability or PRF-M
One survey visit. One dusk emergence survey[a] (structures). No further surveys required (trees).	Two separate dusk emergence survey visits[b].	Three separate dusk emergence survey visits[b].

Figure 1.2 – *BCT extract on 'Low'' suitability survey implications*

1.4 Tyrer Ecological Consultants Ltd were therefore recommissioned to undertake the recommended further bat survey; the dusk emergence survey was carried out in June 2025, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

1.5 Following the results of the first dusk emergence survey in which two bats emerged, consideration was given towards carrying out a second survey to provide additional data which might inform more accurate categorisation of the roost type present, despite the 'Low' bat roost potential assigned to the building. However, during discussion with the applicant the decision to proceed using the data from the first survey only was made, and as such only a single survey was undertaken.

1.6 The survey aimed to identify the presence or reasonably conclude the absence of bats within the building. The results, conclusions and recommendations following the survey, including any mitigation to inform a European Protected Species (EPS) licence application to Natural Resources Wales (NRW), where necessary, will be supplied within this report.

1.7 This report should be read, understood and presented to the local authority as an additional document to **Appendix I** (see Contents page).

2.0 Bats – Legislation & Policy

2.1 All British bats and their **roosts are afforded full protection under the Wildlife & Countryside Act (1981) (as amended) and are listed in Schedule 2 of the Conservation of Habitats and Species Regulations (2017) (as amended). When dealing with cases where an EPS (all UK bats) may be affected, a planning authority is a competent authority within the meaning of Regulation 7 of the Regulations, and therefore has a statutory duty, as the local authority, to have due regard to the provisions of the Regulations in the exercise of its functions.

2.2 Uses of Buildings by Bats

a) Summer breeding roost, and day/occasional roost (May – August)
b) Hibernation roost (October – March)
c) Transitional or temporary roost (other months)

2.3 Roost selection is often closely correlated to suitable foraging habitat within a reasonable commuting distance from the roost and different sites are used depending upon insect densities and abundance; climatic conditions can also affect their ability to successfully forage. All British bats are insectivorous.

*** The term roost is generically referred to as a place that bat/s use for the any of the above reasons, however it should be noted that under the Conservation of Habitats and Species Regulations (2019) (EU Exit) (Regulation 43 (d) the term roost is not used but refers to "a breeding site or resting place of such an animal" and is afforded legal protection. The roost, breeding site or resting place of bats, which ever terminology is used is legally protected whether or not bats are in occupation.*

2.4 Up to twelve bat species have been regularly recorded within Wrexham County to date, many of which use built structures, notably occupied residential buildings, for roosting. The most frequently encountered bat species is the common pipistrelle (*Pipistrellus pipistrellus*) and its abundant status in Wrexham is reflected throughout the UK.

Policy

2.5 The Environment (Wales) Act 2016 ("the Act") requires local planning authorities to have regard to area statements in the development of Local Development Plans. The Act also introduced an enhanced biodiversity and resilience of ecosystems duty (the "Section 6 Duty"). This duty applies to all public authorities in the exercise of their functions in relation to Wales, helping to maximise contributions towards the well-being goals. The Nature Recovery Action Plan supports this legislative requirement by seeking to reverse biodiversity decline, tackle the underlying causes of biodiversity loss, embed nature in decision-making, and increase ecosystem resilience through specific objectives for habitats and species.

2.6 Part 1 of the Act promotes the sustainable management of natural resources. Section 6 states:

"A public authority must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions."

2.7 Section 7 of the Act places a duty on Welsh Ministers to publish, review, and revise lists of habitats and species in Wales that are considered to be of key significance for sustaining and improving biodiversity. Welsh Ministers must also take all reasonable steps to maintain and enhance the habitats and species on these lists, and encourage others to do the same. Section 7, together with the former UK Biodiversity Action Plan (UKBAP), provides the statutory basis for identifying habitats and species of principal importance for conservation in Wales. Equivalent lists for England are published under Section 41 (s.41) of the Natural Environment and Rural Communities (NERC) Act 2006.

2.8 Planning Policy Wales (PPW) 12th Edition (2024) sets out the land-use planning policies of the Welsh Government. It is supported by a series of Technical Advice Notes (TANs), Minerals Technical Advice Notes (MTANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

2.9 PPW (12th Edition, 2024) states:

"The presence of a species protected under European or UK legislation, or under Section 7 of the Environment (Wales) Act 2016 is a material consideration when a planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat and to ensure that the range and population of the species is sustained. Planning authorities should advise anyone submitting a planning application that they must conform with any statutory species protection provisions affecting the site, and potentially the surrounding area, concerned. An ecological survey to confirm whether a protected species is present and an assessment of the likely impact of the development on a protected species may be required in order to inform the development management process. It is considered best practice that screening to determine the presence of protected species should be carried out by a competent ecologist on the basis of data provided by the relevant Local Environmental Record Centre."

2.10 PPW and the National Development Framework (published as *Future Wales – the National Plan 2040*) set out how the planning system at national, regional, and local levels can help deliver these requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).

2.11 PPW also requires developments to achieve a Net Benefit for Biodiversity (NBB):

"Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species (not including non native invasive species), locally or nationally and must work alongside nature and it must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems. A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and longterm, measurable and demonstrable benefit, primarily on or immediately adjacent to- the site. The stepwise approach outlined below is the means of demonstrating the steps which have been taken towards securing a net benefit for biodiversity. In doing so, planning authorities must also take account of and promote the resilience of ecosystems, in particular- the following attributes, known as the DECCA Framework:

- *diversity between and within ecosystems;*
- *the extent or scale of ecosystems;*
- *the condition of ecosystems including their structure and functioning;*
- *the connections between and within ecosystems; and*
- *adaptability of ecosystems including their ability to adapt to, resist and recover from a range of pressures likely to be placed on them through climate change for example.*

2.12 PPW further highlights the importance of Green Infrastructure (GI) at both local and landscape scales:

"The Environment (Wales) Act 2016, provides a context for the delivery of multi-functional green infrastructure. Its protection and provision can make a significant contribution to the sustainable management of natural resources, and in particular to protecting, maintaining and

enhancing biodiversity and the resilience of ecosystems in terms of the diversity within and connections between ecosystems and the extent and condition of these ecosystems, so that they are better able to resist, recover from and adapt to pressures. This means that the development of green infrastructure is an important way for local authorities to deliver their Section 6 duty."

2.13 There are several plans, strategies and national, sub-regional and local policy statements which provide a framework for development in the Plan area. The Planning and Compulsory Purchase Act (2004) makes it a requirement for local planning authorities in Wales to prepare a Local Development Plan (LDP) for their areas.

2.14 Policy SP14 Natural Environment of the Wrexham County Borough Local Development Plan 2013-2028 (Adopted December 2023) mirrors these statements within PPW 2024 and goes on to state the following:

"Development will only be permitted where it seeks to protect, conserve and enhance the natural environment including:

- *Special Areas of Conservation, Special Protection Areas, and Ramsar Sites;*
- *Sites of Special Scientific Interest and National Nature Reserves;*
- *Protected Species and their habitat;*
- *The Clwydian Range and Dee Valley Area of Outstanding Natural Beauty*
- *Local Wildlife Sites;*
- *Local Nature Reserves;*
- *Special Landscape Areas;*
- *Natural landscape features and Green Infrastructure such as trees, hedges and woodland which contribute to the quality and diversity of the natural environment and play an important role in mitigating the impact of climate change;*
- *The quality of natural services including water, soundscape, air and soils; and*
- *Habitats and species of principal importance to Wales"*

3.0 Survey Methods

3.1 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023) edition states:

"*The guidelines do not aim to either override or replace knowledge and experience. It is accepted that departures from the guidelines (e.g. either decreasing or increasing the number of surveys carried out or using alternative methods) are often appropriate. The guidance should be interpreted and adapted on a case-by-case basis according to site-specific factors and the professional judgement of an experienced ecologist. Where examples are used in the guidelines, they are descriptive rather than prescriptive."*

3.2 Relative to the above the survey protocol has been determined using the collective and long standing experience of Tyrer Ecological Consultants Ltd and knowledge of the specific nature of the site.

Survey Protocol

3.3 The survey took place in June 2025, thus within the highly active and social breeding season, when maternity colonies of pregnant females have formed and when bats are giving birth to pups.

3.4 In accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023), it is specified that:

"*The bat active period is generally considered to be between April and October inclusive*", though the period of **May – August** is the optimal most productive period that NRW accept bat surveys and grant EPS licences in relation to bats.

3.5 Typically only surveys within this period are accepted by licensing authorities, as the results of these surveys are used to inform an EPS licence application or a non-licensable Precautionary Working Method Statement (PWMS).

3.6 Where bats are roosting, they are likely to be detected by the ecologists who are trained in the use of bat detector hardware and call analysis software, and specifically how to detect bats and to correctly identify / disseminate bat calls.

3.7 When considering survey protocol, the decisions about whether dusk or dawn surveys are selected are based on the extensive experience of Tyrer Ecological Consultants Ltd, the nature of the building and species that can be anticipated as being present either at the property or in the locality as well as any visual limitations at the survey site.

3.8 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023), it is specified that:

"Roost re-entry visits prior to dawn are no longer routinely recommended for presence/absence surveys due to the risk of bats returning early and being missed … As return times appear to be far more variable (Andrews & Pearson, 2022)."

3.9 In this case, the bat roost potential that exists at the Former Methodist Church presents no problems for dusk observations; if a building is complex, or observations were restricted, or species that are difficult to detect at dusk are suspected then dawn surveys would be conducted where appropriate. At the site there are no visual constraints and to date there is no evidence to suggest the presence of such species.

3.10 Survey protocol should not be determined by parties who are 1) not familiar with the site 2) do not have a sufficient level or experience in relation to the undertaking of dusk / dawn bat surveys.

3.11 The number of surveys and surveyors was adequate relative to the roost potential that was identified on attendance of the site, i.e. **'Low'**, and requiring two surveyors to accurately monitor potential roost features (PRFs) across the structure. Surveyor credentials are provided in **Table 3.1** below:

Table 3.1 – Surveyor credentials

Surveyor(s)	Experience	Surveyor Credentials
Mrs. H. Taylor-Boyd	8 years	• An experienced seasonal consultant with experience of undertaking professional bat surveys.
Mr. D. Boyd	8 years	• An experienced seasonal consultant with experience of undertaking professional bat surveys.

3.12 Surveyors were strategically positioned so that all elevations with bat roost potential could be observed without limitation. The surveyors were aided by full spectrum electronic bat detectors including the Anabat Scout, Elekon Batlogger M & M2, Echometer EM2 Pro, Peersonic RPA3, or equivalent detectors which enable the locating and recording of the high frequency calls that are emitted by bats; echolocation calls were analysed the next day using, Anabat Insight, Kaleidoscope, BatExplorer, Sonobat or equivalent computer software to verify field observations.

3.13 Elevations were also surveyed via the use of a Night Vision Aid (NVA) Camera (Panasonic HC-VXF990, Canon XA35 or Canon XA70) or Nightfox Whisker Night Vision Binoculars with additional illumination provided by infra-red (IR) lighting (for example Nightfox Arc, Nightfox XB5, or additional IR floodlights) where deemed necessary by the attending ecologist(s) – recordings would be subject to review the following day to identify emergences / flight lines and species / abundance.

Survey Limitations

3.14 Following the completion of the further surveys, having carefully considered the results and conclusions derived from all surveys to date, no significant constraints were experienced that might hinder the gathering of ecological data on which to base sound conclusions and recommendations.

4.0 Results

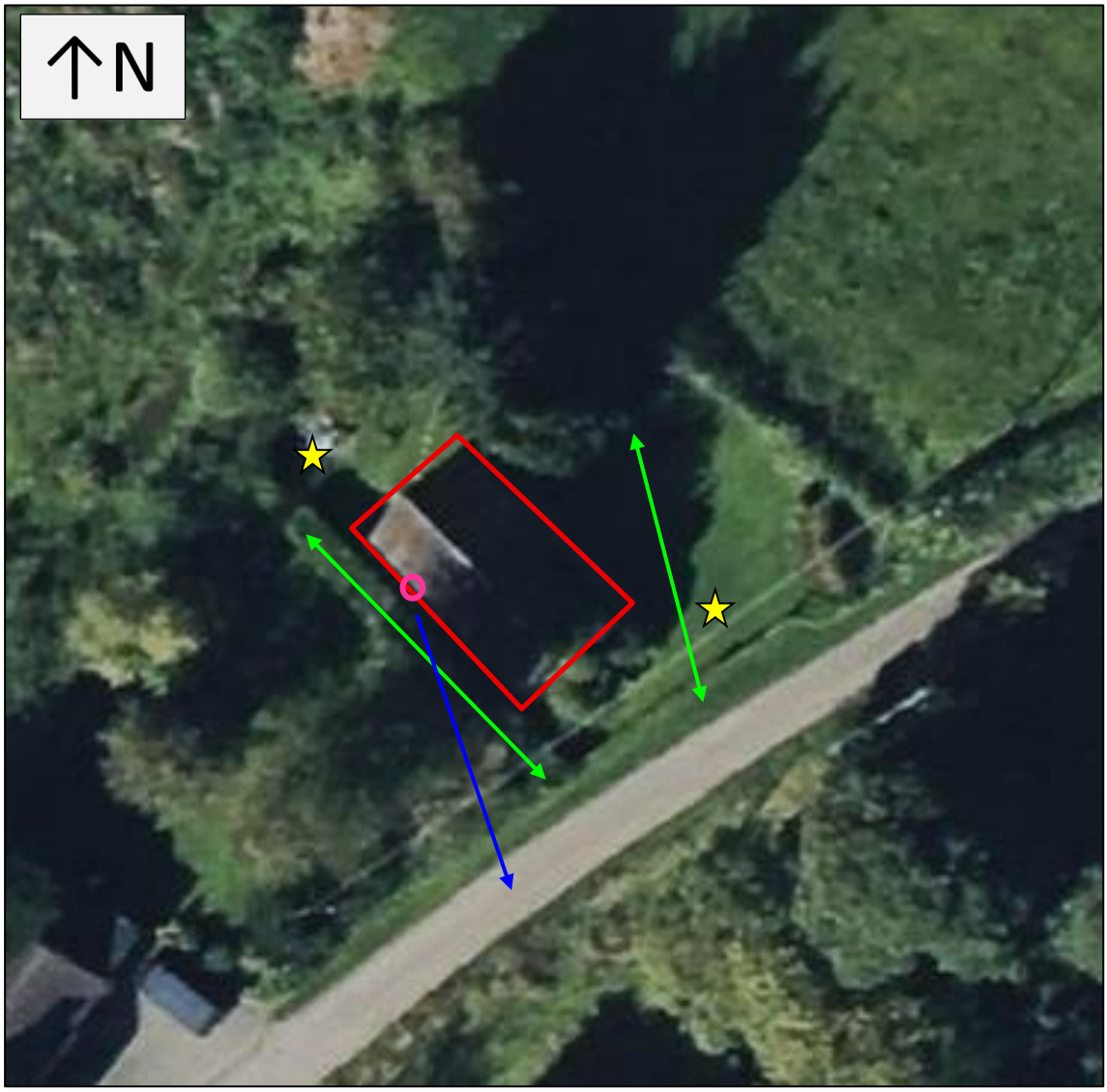
4.1 One dusk emergence survey was undertaken at the site during June 2025 by two surveyors. **Table 4.1** shows survey timings and weather conditions, whilst **Table 4.2** alongside **Figure 4.1 – 4.2** document the results of the dusk survey.

Table 4.1 – Survey date, times and weather conditions

Times of Survey	Date	Weather Conditions
Dusk survey 1 2122 – 2312	26/06/2025	**Sunset: 2142:** Dry, Light. Breeze (2/12 Beaufort), 100% cloud cover Start temp: 18ºC End temp: 14ºC

Table 4.2 – Dusk survey results

Survey Dates	Time	Activity
26/06/2025	2122 – 2312	**Summary: Emergence of two Daubenton's bats from beneath guttering on the south-western aspect. EP1** 2150 – 2153 hrs: Emergence of two Daubenton's (Daub) from beneath guttering on the south-western aspect before commuting south. **EP1** 2154 – 2303 hrs: Occasional foraging by Daub at south-west of building 2157 – 2249 hrs: Frequent foraging by common pipistrelle (CP) at south-west of building. 2200 – 2235 hrs: Frequent foraging by soprano pipistrelle (SP) at south-west of building. 2204 – 2259 hrs: Several noctule (Noc) passes heard but not seen 2211 – 2241 hrs: Constant foraging by CP and SP at north and east of building. 2219 – 2220 hrs: SP briefly entered the building through open window to north-east before exiting again. 2233 hrs: Brown long-eared (BLE) pass heard but not seen General activity comprised of constant foraging by common pipistrelle and soprano pipistrelle bats, occasional foraging by Daubenton's bats, sporadic noctule bat passes and a single brown long-eared bat pass.



Dusk Survey 1 – 26/06/2025

Key			
	Surveyed structure		Foraging activity
	Surveyor positions		Commuting activity
N	Directional compass		Emergence point

Figure 4.1 – *Visual Aid – Dusk survey results with Key*

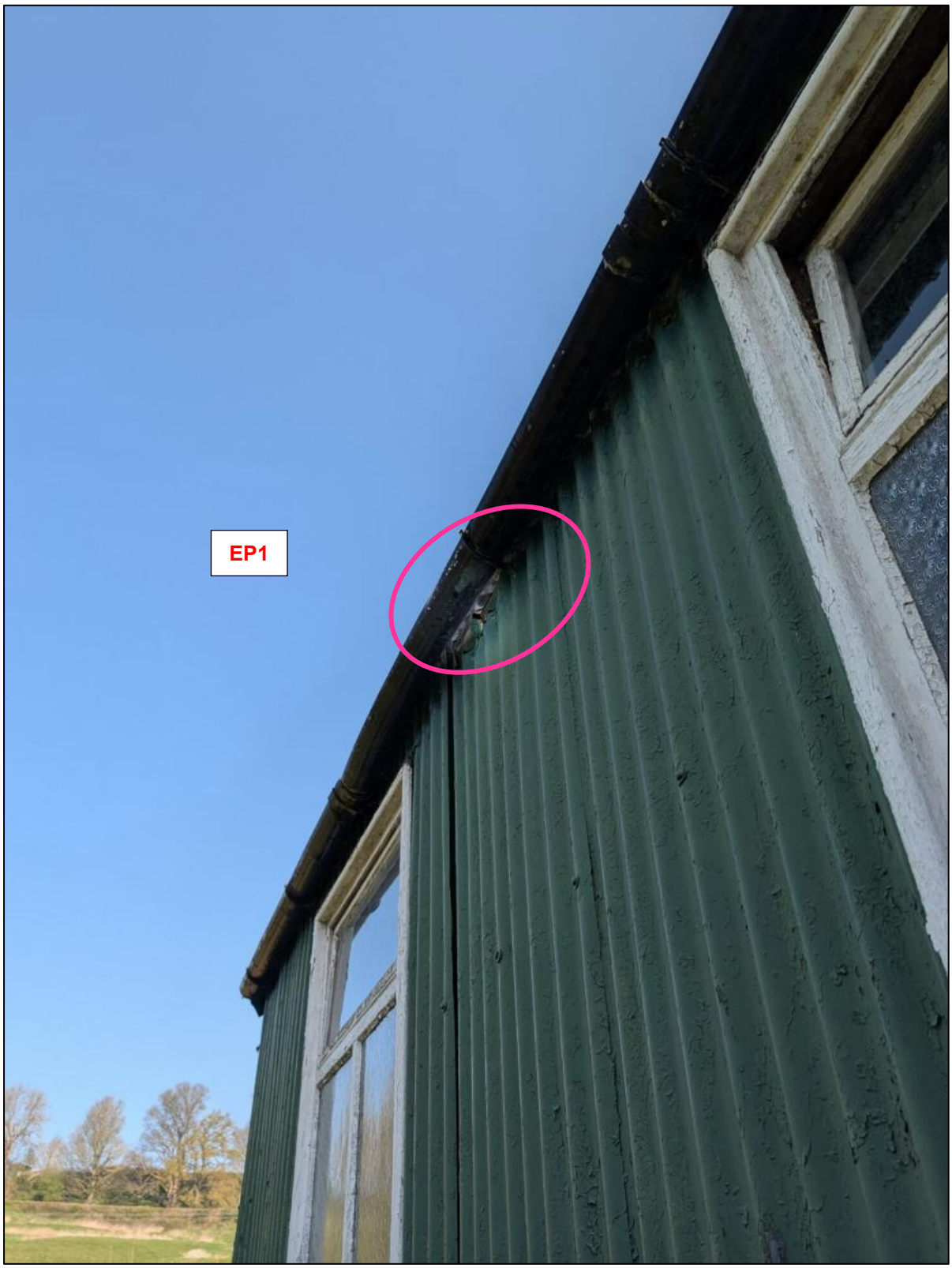


Figure 4.2 – *Location of Emergence Point 1 on south-western aspect (**EP1**)*

5.0 Conclusions & Recommendations

5.1 Based on the results gathered during the dusk surveys, the building is ascertained to be host to a day roost for two Daubenton's bats.

5.2 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023) describes a day roost as the following:

Day roost: *"A place where individual bats, or small groups, rest or shelter in the day during the summer."*

5.3 For clarity, the roost categorisation, location and access point has been provided in **Table 5.1** below, alongside the site status assessment and the conservation significance[1] of the roost:

Table 5.1 – Roost locations and access points at the Former Methodist Church

Structure Reference	Species	Count	Roost Location	Access Points	Site Status Assessment	Conservation Significance
Former Methodist Church	Daubenton's	1	Beneath guttering to the south-west	EP1 – beneath guttering to the south-west	Day	Site

5.4 Proposals are understood to involve the conversion of the former church for residential use. See **Figure 5.1** below for the location of the roost in reference to the proposed site plan.

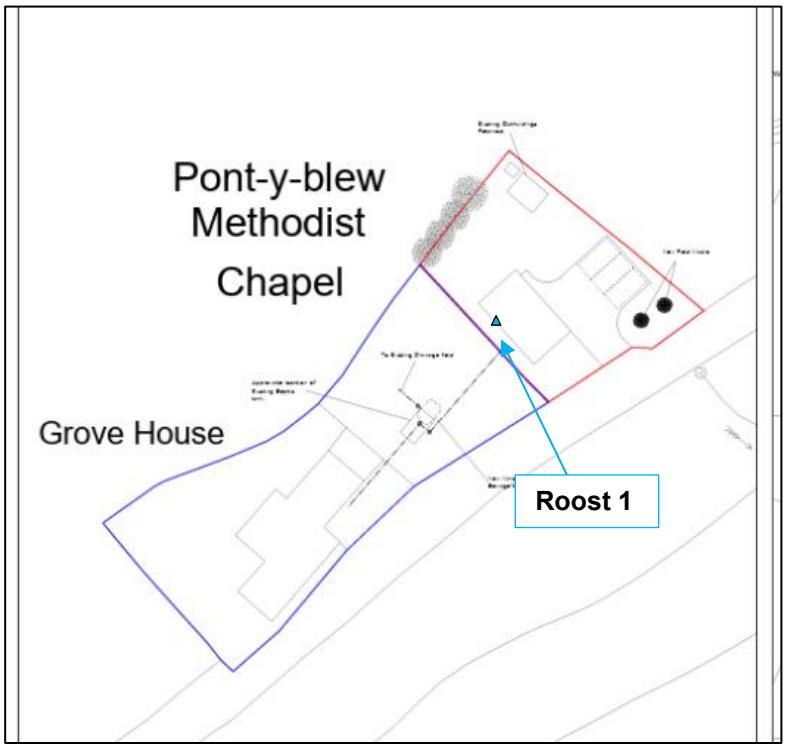


Figure 5.1 – *Approximate location of existing roost over proposed site plan © Blueprint Architectural Services*

[1] As extracted from **Reason, P.F. & Wray, S.** 2025. *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.2.* Chartered Institute of Ecology and Environmental Management, Ampfield

5.5 Based on the above, impacts to a protected species will need to be addressed from both a conservation and legal perspective, along with the application of appropriate mitigation before any works can take place. An EPS licence from NRW will be required to legally impact upon places that are actively used for breeding, rest or shelter (roost) by bats, **however, before a licence can be applied for all planning issues need to be resolved.**

5.6 In order that the LPA can implement its obligations under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), appropriate and proportionate mitigation will need to accompany the planning application which will demonstrate that the "*favourable conservation"* of the species concerned can be maintained.

5.7 Additionally, it should be noted that installation of new lighting as part of a development scheme that exceeds current levels may have a negative impact upon foraging / commuting bats confirmed as present in the vicinity, particularly if increased light spillage occurs in areas currently valued and relatively free from illumination. There are several measures that can be used to offset impacts upon bats, where lighting is unavoidable; these include, however are not limited to: the light source used and luminaire design, and accessories to direct light at its intended target. Numerous software programmes are currently available which can be used inform lighting plans, demonstrating how lighting decisions will illuminate a site. The reader is referred to the Bat Conservation Trust's 'Bats and Artificial Lighting at Night' guidelines (August 2023) for further information.

6.0 Mitigation

6.1 From the evidence gained during the surveys, the use of the site is considered to be of '**Site**' level significance relatable to Daubenton's bats and their current conservation status (as according to current EPS mitigation licencing applications); the proposed mitigation is proportionate to that use. However, if at any time that assessment is revised to a higher level, then the mitigation will also be accordingly revised.

6.2 The following procedures and mitigation recommendations are designed to allow the Local Planning Authority (LPA), in association with their ecological advisors, to determine a Planning Application where an EPS has been identified and will be affected by the work for which the Planning Application seeks consent.

6.3 In addition, LPAs, in accordance with the obligations placed upon them by way of their duties under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), have to take into consideration the presence of a European Protected species (EPS) before determination of an application where it / they have been identified.

6.4 The LPA will consider the mitigation in relation to the potential success of a NRW licence application and if, in their opinion, the mitigation is considered as being appropriate, or if it is over and above what is required; if they determine that the mitigation is appropriate, then **a Planning Condition should be attached**, requiring the roost provision to be implemented. If the LPA consider that the mitigation is over what is necessary but require "enhancement" as part of their green infrastructure / net-benefit for biodiversity planning policies, this should be included in the terms of consent. The acting bat ecologist, in this case, deems the proposed new roost creation as appropriate and not over and above what is required.

6.5 Notwithstanding that Planning Consent is granted, or equally if the work is undertaken outside of the planning system, whereby projects that do not require planning consent may affect bats or their roost (including disturbance), it does not absolve the applicant, site owner, developer or any other party involved with the work from ensuring that an application is made for a European Protected Species Licence to legally undertake work that will affect bat(s) or their roost(s). If work is undertaken without a licence and bat(s) or their roost(s) is/are affected, then a breach of current wildlife legislation will occur, for which penalties are severe.

6.6 Under Regulation 53(1) and 56(3)(a) of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), a licence is required prior to disturbing bats or destroying / damaging or obstructing any place that is used by bats as a resting place or breeding site. The licence is issued by the EPS Licensing Team of NRW.

Summary of Mitigation

6.7 With the existing structure set to be converted, it is acknowledged that the presence of a roosting bat needs to be addressed from both a legal and conservation perspective. For the purposes of this report**, it is considered that the roost will be subject to destruction**, given the renovation works will likely remove the existing roost feature; as such, there is a necessity to consider alternative solutions.

6.8 At the time of writing detailed proposals have not been provided to the author, nor a mitigation scheme agreed by the applicant. As such, this report will need to be reissued prior to the granting of planning permission with a scheme of mitigation included, to accompany the below recommendations. The mitigation proposals will need to form the most productive way forward that will retain long term roosting opportunities for bats and minimise disturbance whilst also enabling the applicant to undertake the proposed works.

6.9 Commuting routes are generally located to the borders of the site, where taller vegetation such hedgerows coincide with an absence of illumination. The key commuting routes appear to be being retained at the post-development stage, with the hedgerow and other vegetation to the edges of the site visible on the Proposed Site Plan © Blueprint Architectural Services, which will provide cover and foci for bats to guide them through the landscape. As such, the works are considered to entail a net neutral impact on the commuting routes to the boundaries of the site.

6.10 The hedgerows to the boundaries of the site provide a moderate value foraging resource, evidenced by the near constant usage of these areas by several bat species. As stated above, these areas appear to be retained post-development, though lighting as part of the development may impact upon foraging bats in the landscape indirectly via increased levels of lighting.

6.11 It is therefore recommended that a bat-friendly lighting plan is produced for the site, which should include measures to avoid illumination of key commuting routes on the boundaries of the site, as well as foraging areas and priority habitats off-site. In addition, no lighting should be directed at roost provision as specified below.

6.12 This lighting plan should be produced by a suitably qualified lighting specialist and should be checked by a licenced bat ecologist against this dusk report to ensure that roost provision and key commuting / foraging areas are not subject to intense lighting.

6.13 To ensure that bats are not left without a roost while works take place that could displace bats from their roost at the building, a pole-mounted receptor roost will need to be installed at the site. The pole-mounted box should be an Eco Rocket Bat Box[2] (or suitable equivalent – to be agreed with the express consent of the ecologist). Receptor roosts serve as a receiver unit for if bats must be captured and translocated to it by the licenced ecologist during the works schedule. The receptor roost should be installed and be in place prior to any deconstruction works and be within a reasonable distance and line of sight of the existing roost(s). The bat box will be retained post works to serve as a permanent roost provision following the works.

Works to be undertaken by the Ecologist

6.14 **Licence Application:** A protected species licence from NRW will be applied for by a suitably qualified Ecologist, subsequently the 'Named Ecologist', in conjunction with the applicant, which will provide details of the measures undertaken to maintain the favourable conservation status of the bats present on site. This could take the form of either an A13 bat mitigation licence and improve the outcome for both bats and the applicant.

6.15 **Toolbox Talk:** Once a protected species licence is in place, at the pre-commencement stage the Named Ecologist (or accredited agent) is to undertake a site induction 'Toolbox talk' to the Licensee and all contractors on possible bat presence and discuss document features taken from the license, i.e. license, method statement, mitigation figures and work schedule to be kept on site for the duration of the work.

6.16 **Pre-commencement Check**: Prior to any work being undertaken the presence / absence of bats, as far as is possible, will be established by the Named Ecologist (or accredited agent) undertaking a thorough investigation of the areas at which bats have been observed using the site. This will involve a thorough inspection of these areas during dismantling using endoscopes and / or narrow-beam torch, as necessary, and will involve a soft strip at the local areas of interest, as necessary, which involves the careful lifting, inspecting and removal of components.

6.17 **Timing Implications:** No timing implications are necessary in relation to the day roost on site.

[2] See: https://www.nestbox.co.uk/products/eco-rocket-bat-box

6.18 **Ecological Clerk of Works:** The Named Ecologist (or their accredited agent) will supervise careful dismantling of all places of bat roost interest. In addition, at the Named Ecologist's discretion, wherever opportunities for bats exist in other areas of the building, supervised dismantling / inspections will extend to these areas with strategies for safely removing bat(s) applied. All dismantling of potential roost features will be undertaken during favourable weather conditions (above 9ºC, low wind).

6.19 **Exclusion:** 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, or longer, at the Named Ecologists 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.

6.20 **Capture:** Any bats located by the Named Ecologist (or accredited agent) will be removed, placed in a secure box with soft tissue and transferred into the receptor roosts that will have been previously erected as indicated below. If bats are in ill-health they will be taken into care by a previously nominated bat carer. **Only once it has been conclusively established by the Named Ecologist that bat(s) are absent can works continue to completion.** In the unlikely event that bats are found outside of supervision time, then as legal requirement and conditions of the licence, work will immediately cease, and the named Ecologist will be contacted for further advice; contractors must not touch, handle or in any way cause bats to move without ecological supervision.

Works undertaken by the contractor

6.21 A single day roost with one identified access point was identified on site, which will be destroyed during the proposed works. As the existing building which is host to the roost will be converted, retention or modification of the identified roost is not possible.

6.22 As such, it is considered that the most feasible and productive approach in terms of maintaining the favourable conservation status of the identified species roosting on site is to integrate novel roosting provision back into the newly converted building. **However, at the time of writing detailed proposed plans have not been provided to the author, and no mitigation has been agreed.**

6.23 Therefore, **subject to the receipt of proposed plans** and **prior to planning being granted, a detailed mitigation scheme must be added to this report,** to accompany the proposed retention of the receptor roost.

6.23 The mitigation proposed will be subject to the approval of the NRW EPS team who may influence the terms of the mitigation; all proposed roost provisions will be dedicated for bats and permanent.

6.24 No post-development monitoring is required for the roost given that it is a 'Day roost' of 'Low' significance, as stated following current guidance (Bat Mitigation Guidelines) concerning Day roosts / low significance roosts.

6.25 Lighting must not be directed at or close to the roost areas nor will it affect nearby foraging places or flight lines. The lighting plan recommended above should take into account the proposed roosting mitigation, and all flight lines to and from these features should be unilluminated at key times.

7.0 References

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- **Communities & Local Government (C&LG)**, 2024. *National Planning Policy Framework*. Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

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- **Mitchell-Jones, A.J. and McLeish, A.P**. (Eds), 2004. *Bat Workers' Manual*, Joint Nature Conservation Committee, Peterborough.

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Appendix I: *PR-25-0105 Former Methodist Church, Pont-y-Blew – Preliminary Ecological Appraisal* (Tyrer Ecological Consultants Ltd, July 2025)