Bat Mitigation Plan

Glyn Ceiriog, Selattyn Road, Llansantffraid, Wrexham,

LL20 7BY

Status	Issue	Name	Date
First	1	Annabel Sharpe Bsc Hons Consultant Ecologist CL18 licence.	03/11/2025
Final	2	Annabel Sharpe Bsc Hons Consultant Ecologist CL18 licence.	5/11/2025

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Ltd. was commissioned by Ms Eleanor Kernighan to prepare a Bat Mitigation Plan for Glyn Ceiriog, Selattyn Road, Llansantffraid, Wrexham, LL20 7BY. A Preliminary Roost Assessment (PRA) was conducted in February 2025 by Arbtech Consulting Ltd. With Bat Emergence and Re-entry surveys (BERS) concluded in July 2025. This bat mitigation plan is for the demolition of a one-storey extension, adjacent to a known bat roost in the main dwelling.

1.2 Proposed development

The works proposed involved the re-roofing and renovation of the on-site dwelling (B1), which includes the demolition of the one-storey flat roof extension on the northern elevation of the building.

1.3 Scope of the Report

The following Bat Mitigation Plan has been designed to outline the mitigation for the internal works of the building. During the BERS survey, the following roosts were identified. These were

1 x Lesser horseshoe- First floor void of the main dwelling (B1).

1x Lesser horseshoe- On-site barn (B2)-

There will be re-roofing of the main dwelling, as well as general restoration, which will impact one of the lesser horseshoe roosts. This work will require the granting of an EPSL from Natural England. The flat-roof extension contains no bat roosts. This mitigation plan will be for the destruction of the flat-roofed building *only,* where no bat roost was identified. This mitigation plan is not to be used for the works for the rest of the main dwelling, which will follow the appropriate EPSL from Natural England.

2.0 Bat Mitigation Plan

2.1 Informative

The following table details the proposed mitigation measures required for the demolition of the existing extension. No work is to take place remainder of B1 without a bat development licence in place from Natural England, which will be required to damage, modify or destroy any bat roost.

2.2 Mitigation Measures

Table 1 details the general ecological precautionary working and mitigation measures to be implemented at the site. These overriding principles should be adhered to.

Table 1 Mitigation Measures

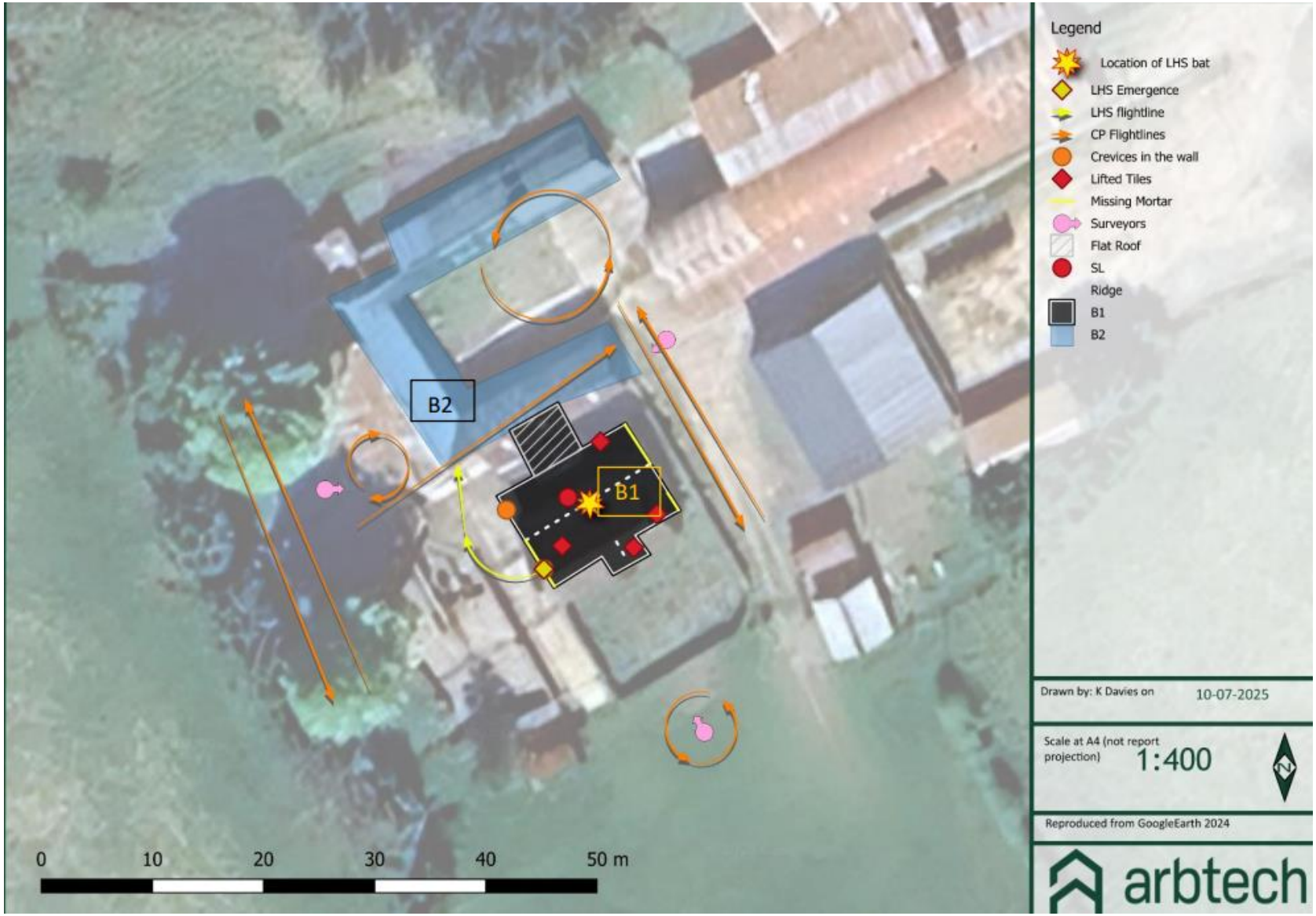
Works	Specification
During works:	
Toolbox Talk	A toolbox talk must be provided to contractors prior to work commencing, to inform them of the roost present within the main dwelling. Bats have been observed on both the upper and lower floors, including using cracks in the ceiling and door frames to roost. There is no need to enter B1 or B2 to demolish the extension. No contractor is to enter B1 without first being cleared and accompanied by a licensed ecologist.
Responsible parties	Tom Ward and Steve Fieldsend will be the named parties responsible for ensuring that this mitigation plan is followed.
Timings (daily)	All working hours will be 7:45am to 5pm ONLY. This will ensure no activity is occurring on site during the crepuscular emergence and re-entry hours of bats.
Timings (monthly)	Work will take place in the inactive season, Oct-March, in far as possible, when bats are less likely to be at the site. Work on the site will begin in 2026. Demolition of the extension is the first task and will begin in February 2026 and should be concluded within a week.
Location of works	Work will take place on the one-storey, flat-roof extension that is joined to B1 on the north elevation and to a barn adjacent. (B2) see Figure 1. The location of the bat roost access point was identified in the furthest corner away from the demolition and therefore won't be impacted by the works. (See Appendix 1)

	 *Figure 1: Flat roof extension to be demolished*
Noise and Vibration	Of particular note is the need to avoid excessive noise or vibration disturbance e.g. from power tools or radios, within proximity of the known roost. In particular, vibrations and noise-removing sections of the walls of the extension, where are directly adjacent to the walls of B1. As horseshoe bats have been observed roosting in the upper and lower floors of B1. All person's present must ensure that noise levels are kept to a minimum in accordance with best practice as defined in the Control of Pollution Act 1974 to avoid unacceptable levels of noise and vibrations. Further guidance can be found in British Standard 5228-1:2009. Such measures applicable to the proposed development primarily include agreed working hours limiting night work, using the quietest equipment and plant available, shutting down equipment when not in use, and completing deliveries during working hours only. Most notably, prescriptions as to limit the noise of plant machinery as detailed within Table B.1 within the code of practice for noise control (British Standards Institution, 2014)
Lighting	Any future lighting on site around the building should follow the guidelines below (note: none is currently planned; these guidelines are included in case of any alterations):

	• Use narrow spectrum light sources to lower the range of species affected by lighting. • Use light sources that emit minimal ultra-violet light. • Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to manage the blue shortwave length content they should be of a warm / neutral colour temperature <4,200 kelvin. • Not use bare bulbs and any light pointing upwards. The spread of light will be kept in line with or below the horizontal. • Light spill will be reduced via the use of low-level lighting used in conjunction with hoods, cowls, louvers and shields. Lights will also be directional to ensure that light is directed to the intended areas only. • External lighting will be on PIR sensors that are sensitive to large objects only (so that they are not triggered by passing bats) and will be set to the shortest time duration to reduce the amount of time the lights are on. • Wall lights and security lights will be 'dimmable' and set to the lowest light intensity settings. There are several products on the market that allow the control of the light intensity and the duration that the lights are on. All lighting on the developed site will make use of the most up to date technology available.
Obstruction of Roost Access Points	No alterations ot any roost access points are to take place without the EPSL in place. The access point was seen to be an upper-floor window in the most southwest corner of B1. No scaffold is to be erected on the building for the demolition of the one-storey extension; therefore, no blocking of access points.
Ecological supervision	Due to the highly mobile nature of bats and the ease of access to the extension, prior to the start of the demolition, a licensed ecologist will check inside the extension to check that no hibernating horseshoe bats are present. This is due to work starting in February. **If hibernating bats are discovered in the extension, then demolition cannot occur at that time**. Hibernating bats cannot be moved at any time, and no licence can be granted to allow this. The ecologist aiding with the EPSL application and Natural England will be informed, and any necessary changes in the licence will occur. Demolition will have to be rescheduled if hibernating bats are discovered. If concluded that horseshoe bats are still not using the extension, then demolition works can continue.
Post development	

Roost maintenance	The remainder of the work on the site will be undertaken with the correct EPSL. Works will follow the requirements as stated in the licence, and any follow-up roost monitoring to be stated by the EPSL

Appendix 1: Map showing existing roost location, BERS survey 2025- Flat roof=Location of demolition works



Appendix 2: Legislation and Planning Policy

LEGAL PROTECTION

All species of bat are fully protected under ***The Conservation of Habitats and Species Regulations 2017*** through their inclusion on Schedule 2.

Regulation 43: Protection of certain wild animals - offences

(1) A person is guilty of an offence if they:

(a) Deliberately captures, injures or kills any wild animal of a European protected species,

(b) Deliberately disturbs wild animals of any such species,

(c) Deliberately takes or destroys the eggs of such an animal, or

(d) Damages or destroys a breeding site or resting place of such an animal,

(2) For the purposes of paragraph (1) (b), disturbance of animals includes in particular any disturbance which is likely—

(a) To impair their ability:

(i) To survive, to breed or reproduce, or to rear or nurture their young; or

(ii) In the case of animals of a hibernating or migratory species, to hibernate or migrate; or

(b) To affect significantly the local distribution or abundance of the species to which they belong.

Bats are also protected under the ***Wildlife and Countryside Act 1981 (as amended)*** through their inclusion on ***Schedule 5***. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale

NATIONAL PLANNING POLICY (ENGLAND)

National Planning Policy Framework 2017

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as UK Biodiversity Action Plan priority species) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; opportunities to incorporate biodiversity in and around developments are encouraged; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

Effect on development works:

A European Protected Species Mitigation (EPSM) Licence issued by Natural England will be required for works likely to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficiency/success to be monitored. The legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded *de facto* protection, for example, where it can be proven that the continued usage of such areas is crucial to maintaining the integrity and long-term viability of a bat roost (Garland & Markham, 2008).

There are 17 species of bat breeding in England and Natural England issues licences under Regulation 55 of the Habitats Regulations to allow you to work within the law.

Licences are issued for specific purposes stated in the Regulations, if the following three tests are met:

- The purpose of the work meets one of those listed in the Habitats Regulations (see below);
- That there is no satisfactory alternative;
- That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range

The Habitats Regulations permits licences to be issued for a specific set of purposes including:

1. ***include preserving public health or public safety or other imperative reasons of over-riding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;***
2. scientific and educational purposes,
3. ringing or marking
4. conserving wild animals

Development works fall under the first purpose and Natural England issues bat mitigation licences for developments.