The Coach House at Bryn Eglwys

Castle Rd, Chirk, LL14 5BS

Bat and Bird Survey Report

October 2025

Amended November 27th 2025



Produced by Wildbanks Conservation

www.wildbanksconservation.com

REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

Report Version	Date	Completed by:	Date:	Approved by:
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All text in BLUE is the information added on 27/11/25 to answer queries raised within NRW consultation dated 07/11/25 (Ref. CAS-291052-S8M1).

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

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1.0 INTRODUCTION

1.1 This report has been prepared on behalf of Mr Andy Burgess and provides the results of a Preliminary Roost Assessment (PRA) and Emergence Surveys undertaken on outbuildings associated with The Coach House at Bryn Eglwys, Castle Rd, Chirk, LL14 5BS (approximate OS Grid Ref: SJ 29035 37621) during the summer of 2025.

1.2 The Preliminary Roost Assessment (PRA) was required to establish the presence or potential presence of roosting bats or features that could be used by bats within the property, identify potential constraints to the proposal, and outline the mitigation measures where relevant. If a bat or its roost/place of rest or shelter is identified and subsequently affected by the works, then a European Protected Species Development Licence, issued by Natural Resources Wales (NRW), would be required to proceed with the development.

1.3 In addition to roosting potential, the development site and surrounding habitat may also be used by bats for foraging and commuting or birds for breeding and nesting. Any loss or fragmentation of linear features or foraging areas (e.g. woodland edges, hedgerows, or open glades) should be assessed in terms of ecological functionality, with mitigation or enhancement measures proposed where necessary to maintain habitat connectivity and minimise disturbance, particularly from lighting.

1.4 The landownership boundary includes the residential dwellings of Bryn Eglwys and the previously converted barn (2001) known as "the Coach House". The landownership boundary is defined by the blueline shown on Figure 1. The purpose of the proposed works is to separate the Coach House and Bryn Eglwys into separate properties for the future separate sale of Bryn Eglwys. The proposed works (subject of this planning application) include renovating and internally joining the outbuilding (yellow building on Fig. 1) and the Coach House (pink building on Fig. 1) and modifying the garage (green building on Fig. 1) to facilitate new driveway installation (grey line on Fig. 1). A separate small outbuilding known as the "potting shed" (purple building on Fig. 1) will remain in situ and undeveloped as part of the proposed works.

1.5 The outbuilding comprises single storey, stone barn, with associated garage. A mature, overgrown garden lies to the west and southwest. The footprint of the outbuilding shall remain the same post-construction. The outbuilding, garage, potting shed and garden are the focus of this PRA as development works will be localised in this area. This area is defined by the redline boundary of Figure 1 (this redline boundary is for ease of reference within this Report and may be subject to change as part of the planning process) and is referred to as the "Site" from this point on.

1.6 The Coach House is not due to be altered within the proposed works, however, due to it adjoining the outbuilding and its close proximity to the work area, any bats roosting within the western end or southern aspect of the building will likely be disturbed by the proposed works. Therefore, the western and southern aspect of the Coach House were also assessed for bat roosting potential and included within the areas surveyed during the nocturnal surveys.

2.0 SITE DESCRIPTION

2.1 The Site is situated on the outskirts of Chirk town. The property is immediately bounded by residential properties in all directions; however, the surrounding habitat beyond this opens into broadleaf woodland blocks, pasture and arable farmland within 300m to the east, 500m to the west and 100m to the south. Residential properties, amenity greenspaces and industrial land lie to the north of the Site. The River Ceiriog lies 300m to the south. The wider landscape includes mostly pasture and arable farmland and broadleaf woodland.

2.2 The immediate habitat surrounding the site is considered to be of moderate foraging value to bats and moderate roosting value also, consisting of multiple old, detached properties, a church and mature trees. The wider landscape is considered high foraging value.

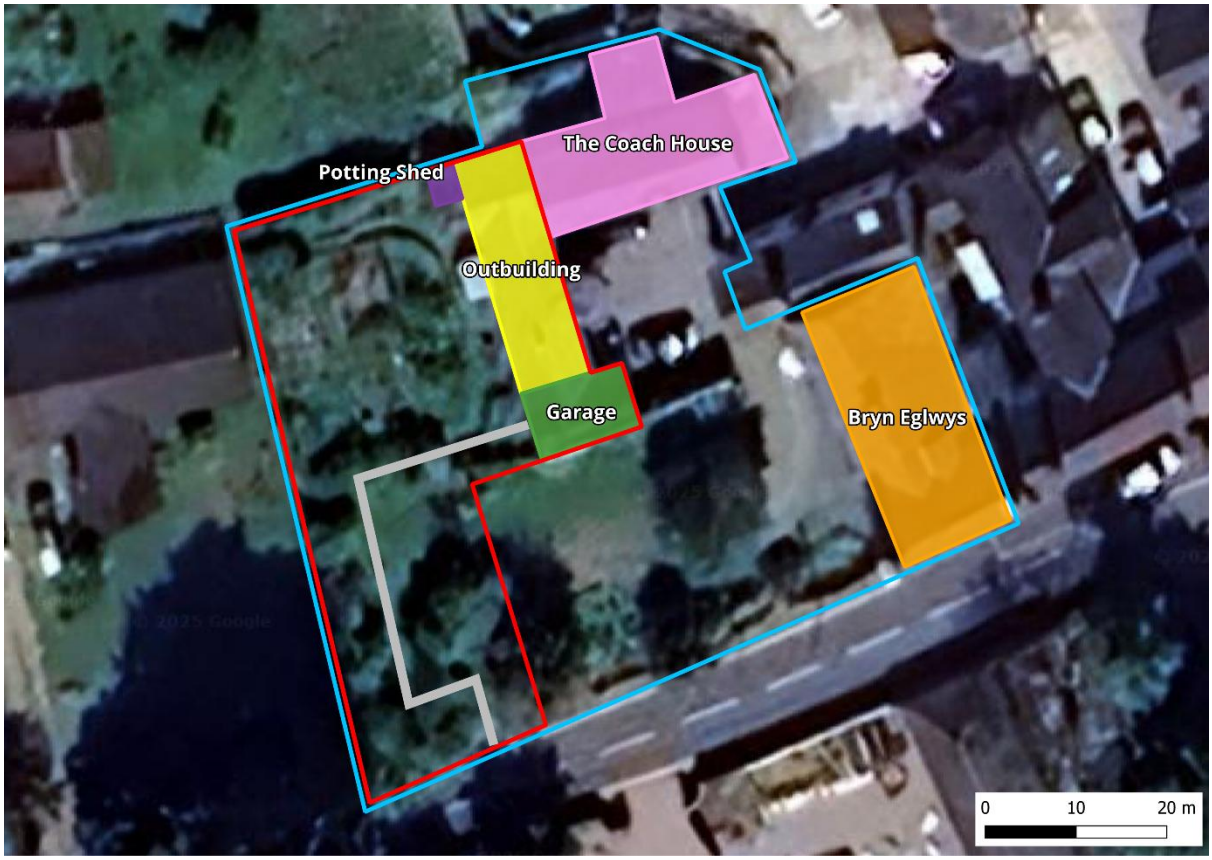


Figure 1. Aerial map showing landownership boundary outlined blue; proposed development boundary outlined red. Buildings are coloured as follows: Bryn Eglwys – orange, the Coach House – pink, outbuilding – yellow, garage associated with outbuilding – green, 'potting shed' – purple. The approximate location of new driveway shown with grey line. (Imagery ©2025 Airbus, Bluesky, Infoterra Ltd & COWI A/S, Infoterra Ltd & Bluesky, Maxar Technologies, Map data ©2025)



Figure 2. Aerial map showing the Site in the context of the wider landscape. (Imagery ©2025 Airbus, Bluesky, Infoterra Ltd & COWI A/S, CNES / Airbus, Infoterra Ltd & Bluesky, Maxar Technologies, Map data ©2025 Google)

3.0 SURVEY METHODOLOGY

3.1 To inform this Bat and Bird Survey Report, a Preliminary Roost Assessment including a desk-top study and visual assessment were undertaken, as well as nocturnal surveys in line with Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023).

Desk Top Study

3.2 A desk top study was undertaken by Wildbanks Conservation Ltd using the following online resources for background information of the Site.

- MAGIC website
- Ordnance Survey maps
- Aerial photographs

3.3 **Building Visual Assessment**

Bats

3.3.1 The exterior of all aspects of the building was visually assessed for potential roost features (PRFs), potential access points and evidence of bat activity on 2nd July 2025. With the aid of binoculars and endoscopes, features such as gaps in brickwork, small gaps under barge/soffit/fascia boards, raised or missing roof/ridge tiles or gaps at gable ends, which have the potential for use as roosts/access points, were sought. Evidence that bats actively used these PRFs/access points would include staining within the gaps, or bat droppings or urine staining under gaps; a note being made wherever these were present. The presence of cobwebs and/or general detritus within and around PRFs was used as an indicator that bats had not recently used the area to access the building. Following the external assessment, an internal assessment of the building was undertaken, searching for the same evidence.

Birds

3.3.2 The building was assessed for nesting birds at the same time as the bat visual assessment. All cracks, gaps and potential nesting areas were checked for the presence of nests/nesting material/live birds.

3.4 **Emergence Survey**

3.4.1 Three nocturnal emergence surveys were undertaken on the outbuildings to observe if bats are roosting in the property. All surveys were overseen by Mick Smith, 18 years' experience in bat ecology, holder of NRW bat licence (licence no: S095544/1), and 24 EPS Mitigation licenses (NRW and NE). With onsite survey lead being Mick Smith and Tony Medcalf (NRW bat license S095319-

1). Surveyors were positioned strategically so that good coverage of all aspects of the building was achieved (Figures 6-8).

3.4.2 NVAs were positioned to either assist surveyors or to cover negligible roosting potential areas of the building i.e. northern and southern aspects of the outbuilding/garage. Following the recording of emergences from inside of the outbuilding in the first emergence survey, additional NVAs were positioned internally during surveys two and three to maximise internal coverage and locate roost entrances. During the third emergence survey, an NVA was relocated from the northern aspect of the outbuilding to the internal aspect (Figure 6). This northern aspect of the building was considered to have low roost potential and following Survey Guidelines, the likely absence of roosts can be confirmed following no emergences observed during two surveys, therefore, the NVA was relocated.

3.4.3 The surveyors each used an Anabat Walkabout, Pixfra Arc or Flir Scion thermal video cameras and/or Nightfox Whisker infrared cameras. Any recordings were analysed using Anabat Insight, and video footage from the thermal/infrared cameras was reviewed using VLC media player.

3.4.4 The surveys were undertaken within the optimum time for bat activity (May-September) and under optimum conditions. The surveys were undertaken following methodology set out in the Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023).

Table 1: Emergence surveys were carried out as follows:

Survey	Date	Surveyors
Dusk	08/07/2025	Mick Smith, Jack Halpin (Accredited NE bat licence no: 20120558, and 8 yrs experience in bat ecology) & Tanya Cobb (3 yrs)
Dusk	06/08/2025	Tony Medcalf (NRW bat licence no: S095319/1), J. Halpin & T. Cobb
Dusk	27/08/2025	T. Medcalf, J. Halpin & Joe Carroll (2 yrs)

3.5 Limitations

3.5.1 There were no limitations to the visual assessment. It was conducted in July, and this is within the optimal survey season to identify potential roost features and assess whether bats could or birds are using a building. The whole exterior and interior of the building was visible during the visual assessment.

3.5.2 The outbuilding's close proximity to The Coach House and Bryn Eglwys, meant that the Night Vision Aid cameras could not always be placed far enough away from the building to maximise visibility on all external aspects of the building. The camera angles were not wide enough on their

own, however, in conjunction with optimal surveyor positioning the entire external aspect of the building was visible for all nocturnal surveys.

3.5.3 Also, visibility of areas of the building was restricted due to foliage against the walls of the building. For example, the Acer *sp.* tree in the courtyard partially covered the open archway from the surveyor location and NVA camera positioning. Surveyor and NVA positioning were optimised in latter surveys, and this minimal visibility restriction did not prove to hinder accuracy of emergence recordings as emergences were cross-referenced with multiple NVA cameras in close proximity.

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

4.0 RESULTS

4.1 Desk Top Study

4.1.1 Two statutory designated sites exists within 2km of the Site.

- River Dee and Bala Lake/Afon Dyfrdwy a Llyn Tegid SAC/SSSI
  The River Dee is located 290m to the south of the Site and is designated for its "nationally important transition through a range of river types from mesotrophic to eutrophic. It is also notified for Atlantic salmon *Salmo salar*, otter Lut*ra lutra*, club-tailed dragonfly *Gomphus vulgatissimus* and fluvial geomorphology" (Natural England, 2002).

- Chirk Castle and Parkland SSSI
  Chirk Castle and Parkland lies 890m to the west of the Site and is designated for its ancient wood pasture and parkland, invertebrate populations, breeding roosts of Lesser horseshoe bat *Rhinolophus hipposideros* diverse assemblage of grassland fungi.

4.1.2 No local, non-statutory sites exist within 2km of the Site.

4.2 Building Visual Assessment

Bats

4.2.1 The outbuilding is a one storey, brick and stone building with a pitched slate roof (Plates 1-6). The outbuilding adjoins at a right angle to the Coach House. A courtyard is present in the centre of the building complex, and another small courtyard is located to the rear of the Coach House. The stone 'potting shed' adjoins the outbuilding to the northwest. The garden lies to the south and west of the outbuilding.

4.2.2 The outbuilding is split internally into a garage and three rooms. All rooms are currently used for storage. The northern-most room has free flight bat access via a full height, open archway (Plate 2 and 9), leading to the courtyard, presumably built as a carport.

4.2.3 The external brickwork and roof tiles of the building are in good condition with no gaps into the building. The roof was replaced in 2014 and remains in good condition (Plate 7). The doors and windows to the garage and two southern-most rooms are well sealed with no bat access into these rooms (plate 1). The fascia board is set away from the brickwork, however, the well-sealed timberwork provides no gaps into the building (Plate 8).

4.2.4 The internal areas of the garage and two southern-most rooms were inspected during the visual assessment, however, there was no sign of bat use and no potential bat access into these rooms from the outside.

4.2.5 The open access northern-most room (presumably built as car port) has a vaulted ceiling with exposed timberwork and roofing membrane (Plate 9). Numerous opportunities for roosting bats exist within and atop the timberwork, including atop purlins and rafters (Plate 10). PRF's also exist on the wall plates and where the timbers rest on the walls.

4.2.6 The 'potting shed' is approximately 2m x 2m and also appears well sealed around the stone and timberwork; however, the door remains open day-to-day, and the glass windowpane has slipped, providing free flight access inside. The roof is lined, and internal timberwork is in good condition with no gaps onto wall plates (Plate 11). Six bat droppings were found on the shelves within this shed (Plate 12).

4.2.7 The Coach House was renovated in 2001 and remains well-sealed to bats. The stonework is intact around the building with no missing stones or gaps into the wall. On the western gable end, the mortar is intact along the verge, and no gaps exist under the roof or ridge tiles (Plate 13). There is no bat access into the loft space, which was inspected, and no light ingress or evidence of bat use was found. Along the southern aspect of the Coach House the fascia boards were raised away from the stonework (Plate 2); in some areas, these gaps were filled with a mesh material, preventing bat access.

4.2.8 The **outbuilding was overall categorised as having moderate potential for roosting bats**, with the majority of PRF's associated with the roof and found in the northern-most, open room.

4.2.9 It is likely that several small trees are to be felled during the works to facilitate installation of the new driveway. A visual inspection of these trees, from the ground, indicates that none of these trees have potential to host roosting bats; no potential bat features were present, or the trees were too small in size to contain potential roost features.

Birds

4.2.10 No nesting material or evidence of nesting birds was found within the building. Numerous nesting opportunities exist within garden shrubs and trees.

4.3 Emergence Survey

4.3.1 Three emergence surveys were undertaken and are detailed in Table 2.

Table 2: Details emergence surveys undertaken.

Date	Survey type	Time started	Time finished	Sunset time	Temp. (°C)	Weather conditions
08/07/2025	Dusk	21.22	23.37	21.37	15	Dry, warm, calm
06/08/2025	Dusk	20.41	22.56	20:56	16	Warm, dry, overcast, light breeze
27/08/2025	Dusk	19:58	22:08	20:08	16	Dry, overcast, calm

4.3.2 **Survey 1** - *Dusk survey 8th July 2025*

During the survey, four emergences were recorded, and general bat activity was moderate, but localised to the central courtyard area. The first bat activity recorded was a commuting Noctule (*Nyctalus noctula*) at 21.45. At 21.53. 16min after sunset, at least one Common pipistrelle (*Pipistrellus pipistrellus*) was recorded flying inside the northern-most room of the outbuilding and this behaviour continued until t**hree Common pipistrelle bats emerged (Roost R1)** via the open archway between 22.07 and 22.09, (30-32min after sunset). At 22.32, 55min after sunset, a **Brown long-eared bat (*Plecotus auritus*) was recorded flying inside the same northern-most room, and this emerged (Roost R3)** through the archway at 23.00. This BLE was recorded repeatedly flying at the apex of the western gable wall. At 22.48, a Common pipistrelle potentially emerged from the potting shed and flew west, however, the timing of the sighting was after light levels were too low for the bat to be completely visible to the surveyor and the view of this building was partially obscured in the thermal video footage. This was 71 minutes after sunset which is late for common pipistrelles to emerge from their roost and the NVA shows bats foraging within the garden. Therefore, it is assumed that this is not an emergence but a bat that flies close to the potting shed. Regular foraging of Common pipistrelle and Soprano pipistrelle bats was recorded within the courtyard and the outbuilding through the open archway. A single Whiskered/Brandt's bat (*Myotis mystacinus/brandtii)* was recorded commuting through the courtyard at 23.23.

4.3.3 **Survey 2** - *Dusk survey 6th August 2025*

Similarly to the first survey, three emergences were recorded, and general bat activity was moderate, but localised to the central courtyard area. The first bat activity recorded was a **Common pipistrelle emerging from the northern-most room (Roost R1)**, through the archway, at 21.13, 17min after sunset and foraging in and out of the building for five minutes. At 21.22, 26 min after sunset, a **Whiskered/Brandt's bat emerged from the same location (Roost R2)**. A **Brown long-eared bat (BLE) emerged (Roost R3)** and flew around the internal of the northern-most room for ten minutes at 24 mins after sunset before exiting via the archway at 21.30. Regular foraging of a Common pipistrelle bat was recorded within the courtyard and the outbuilding through the open archway between 21.27 and 21.46.

4.3.4 **Survey 3** - *Dusk survey 27th August 2025*

General bat activity was moderate, localised to the central courtyard area, however, **one Soprano pipistrelle was recorded emerging from under the fascia board on the southern aspect of the Coach House (Roost R4)** at 20.25, 17min after sunset. Regular foraging of a Common pipistrelle bat was recorded within the courtyard and the outbuilding through the open archway between 20.22 and 21.45. No bats were seen emerging from the northern most room.

4.4 **Summary of Roosts**

It is considered that the level of survey effort undertaken is sufficient to assess the use of the buildings by bats. The property consists of four bat roosts.

Table 3: Summary of roosts

Roost Number	Species	Peak number	Survey recorded	Type of Roost	Description
R1	Common pipistrelle	3	1st & 2nd	Day	Atop wall plate (see paragraph 5.5 for details)
R2	Whiskered/Brandt's bat	1	2nd	Day	Atop wall plate (see paragraph 5.5 for details)
R3	Brown long-eared bat	1	1st & 2nd	Day	Atop wall plate (see paragraph 5.5 for details)
R4	Soprano pipistrelle	1	3rd	Day	Fascia board of the Coach House

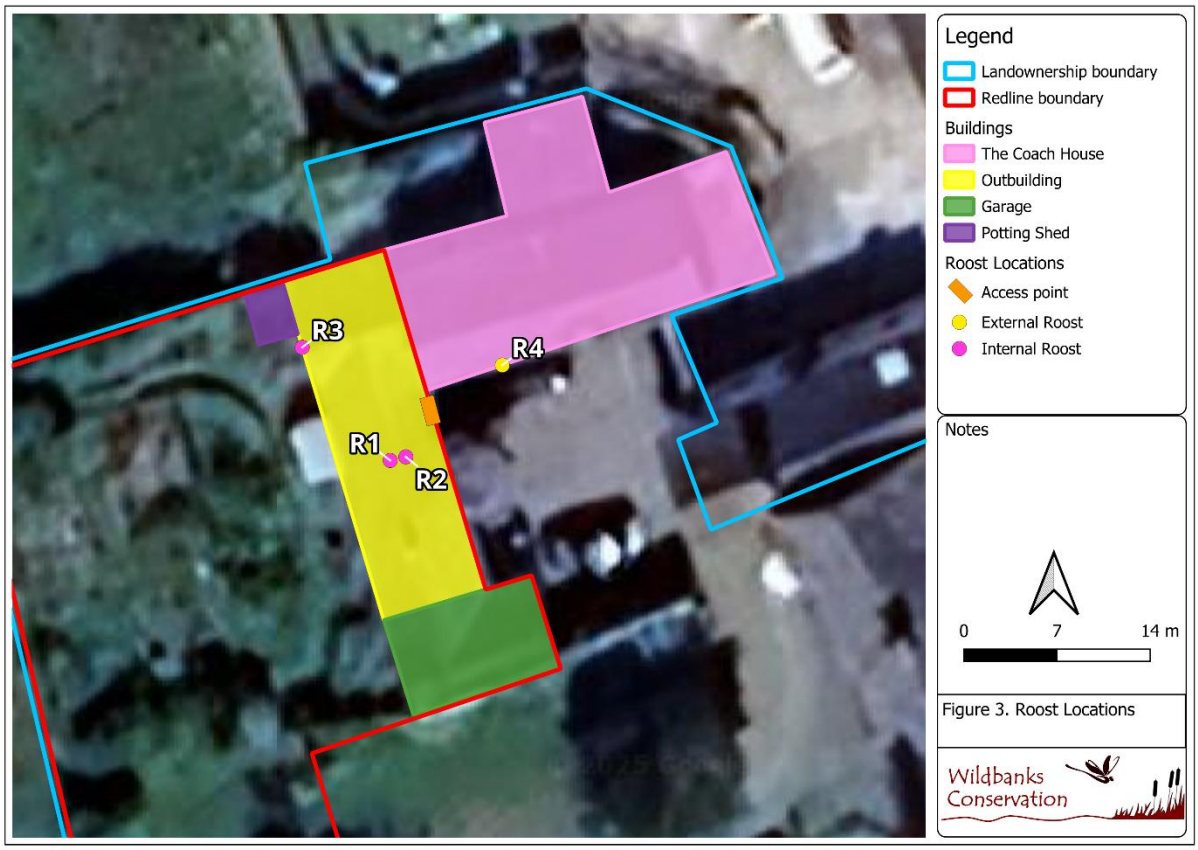


Figure 3: An aerial view of the Site showing external roost locations with yellow circle, internal roost locations with pink circle and access points into building by orange rectangle.

5.0 DISCUSSION AND RECOMMENDATIONS

5.1 The Site has been subject to a Preliminary Roost Assessment (PRA) on 2nd July 2025, desk top study and three emergence surveys overseen by Mick Smith (NRW bat licence number: S095544/1).

5.2 The building is in good structural condition and overall well-sealed with few PRFs. These are limited to within, and atop, the internal walls and roof structure timberwork, including atop purlins and rafters, of the open access, northern-most room of the outbuilding and atop the internal timberwork of the 'potting shed'. Six bat droppings were also found on the shelves within the potting shed. The thermal regime of the northern room of the outbuilding is unstable as the open, carport style, archway allows light and weather ingress into the building.

5.3 After the Visual Assessment, the building was classified as having **moderate potential for roosting bats** with opportunities for only small numbers of crevice dwelling bats

5.4 Following the three emergence surveys conducted during the peak activity season for bats, it was determined that the outbuilding contains one Common pipistrelle day roost (max count 3), one Whiskered/Brandt's day roost (max count 1) and one Brown long-eared day roost (max count 1). The Coach House also contains one Soprano pipistrelle day roost (max count 1).

5.5 During the three nocturnal surveys, using multiple NVA and surveyors, the exact location of roosts R1, R2 and R3 could not be exactly pinpointed. All internal aspects of the northernmost room of the outbuilding were filmed during the three nocturnal surveys, and all emergences occurred outside the field of view of surveyor/NVA. Due to the size of the building, and field of views of NVA's, all internal aspects could not be filmed in any one survey. No congregation of droppings was found inside the building that would suggest regular, concentrated use by roosting bats and the roosts were not used during each survey, for example R2 was only recorded during the second survey. It is, therefore, considered that these roosts cannot by habitually used throughout peak bat activity season. Through experience and knowledge of Common pipistrelle, Whiskered/Brandt's and BLE ecology, it is assumed that because of the few numbers of individuals identified in the building during the surveys, lack of concentration of droppings present and the behaviour that the bats exhibited during the survey (repeatedly flying to gable wall apex), that roosts R1, R2 and R3 (Plate 9) are likely located atop gable wall plates in the positions shown in Figure 3 within the outbuilding. It is assumed that these three roosts are transient day roosts, by opportunistic bats.

5.6 Six bat droppings were found in the potting shed during the Visual Assessment, however, no bat was recorded emerging from the potting shed in any of the three emergence surveys, even though an NVA was focused on it. Significant activity around the potting shed was also not recorded during the surveys. The potting shed is therefore considered to be likely absent of a bat roost as per Survey

Guidelines (Collins, 2023). If this were the site of a feeding roost, a larger concentration of droppings would be expected. Therefore, this collection of droppings is considered a byproduct of occasional, opportunistic flight access by individual bats into the potting shed and is not a roost.

5.7 No evidence of nesting birds was recorded using the buildings; however, potential nesting habitat exists within all the shrubs and trees within the garden and within the building.

5.8 The proposed works include renovating and incorporating the outbuilding into the living space of the Coach House by knocking through between the two buildings. Modification to the garage to facilitate new driveway will also take place. The development works will modify/destroy access points and bat roosts and potentially disturb roosting bats, without mitigation.

5.9 **Significance of roost**

5.9.1 **The building is classified as having multiple confirmed roosts of low roost significance.**

5.9.2 Locally: Roost R1 is a day roost for small number of Common pipistrelle bats (max count 3). Common pipistrelle bats are known to frequent a range of roosts and types, within their wider landscape, across the year. Due to the type of roost, its size and the likelihood that individuals will have multiple other roosts within the local area, the roost is considered to be of low conservation significance locally.

5.9.3 Locally: Roost R2 is a day roost used by a single Whiskered/Brandt's bat. These species cannot be identified to species level through call alone but do occupy similar ecological niches and, therefore, population impacts are considered as a group. These species are recognised for their opportunistic and highly flexible roosting behaviour, regularly exploiting a range of structures including buildings, tree cavities, and bat boxes (Dietz et al. 2009; Hundt 2012). Like several other Myotis species, they maintain a network of roosts within their home range and switch frequently between them, sometimes on a nightly basis (Lewis 1995; Kerth & König 1999). This behaviour mirrors that described for Common pipistrelles and Natterer's bats in the provided text, which both rely on a dynamic network of sites rather than single roosts. Given that Roost R2 is occupied by only one individual and the species is known to make regular use of multiple roost types in the surrounding landscape, this site is considered to be of low conservation significance locally. It represents just one component of a wider network available to the bat.

5.9.4 Locally: Roost R3 is a day roost used by a single Brown long-eared bat. This species is widespread across North Wales and demonstrates considerable flexibility in its roosting behaviour, regularly occupying a variety of structures, including barns, attics, churches, and tree cavities (Boyd & Stebbings 1989; Lewis, 1995). Studies have shown that brown long-eared bats often maintain a network of roosts within a local area, switching between them frequently, particularly during the

summer months (Lewis 1995). Given that the individual recorded at Roost R3 was only recorded during the 1st survey, it is highly likely to have access to multiple other roosts within their local landscape, this site is considered to be of low conservation significance locally. It forms part of a wider network of day roosts available to the local population, rather than being critical in isolation.

5.9.5 Locally: Roost R4 is considered a Soprano pipistrelle day roost. Soprano pipistrelles are known to frequent a range of roosts and types, within their wider landscape, across the year. Due to the type of roost, its size, that it was only present during one of the three nocturnal surveys and the likelihood that individuals will have multiple other roosts within the local area, the roost is considered to be of low conservation significance locally.

5.9.6 Regionally: Common pipistrelles are considered to be widespread and common species of bat, with British data showing species population numbers increasing (Bat Conservation Trust, 2024). Therefore, the roosts are regarded as of negligible conservation significance regionally.

5.9.7 Regionally: Whiskered and Brandt's bats are widespread but relatively scarce across England and Wales, and their populations are difficult to assess due to the challenges of distinguishing them in the field (Altringham 2011). To account for this, they are monitored collectively by the National Bat Monitoring Programme. NBMP data show a long-term decline in Wales of –21.4% and a short-term decline of –16.9% (NBMP 2024). As Roost R2 supports only a single bat and is likely a transient day roost, it is considered of low conservation significance regionally. However, the observed downward trends in Welsh populations underline the importance of continuing survey and monitoring efforts to clarify the true conservation status of these species.

5.9.8 Regionally: The Brown long-eared bat is widespread across the UK and remains one of the more frequently encountered species in roost surveys (Altringham 2011). Data from the National Bat Monitoring Programme indicates a long-term decline in Wales (–27.4% since monitoring began) but a stable short-term trend across the country (NBMP 2024). The roost at R3, which is used by one individual and is most likely a transient day roost rather than a maternity or hibernation site, is therefore assessed to be of negligible conservation significance regionally. Nevertheless, given the evidence of population declines in Wales, continued monitoring of roosts such as R3 is important, as they form part of the dynamic network of sites required to sustain local populations.

5.9.9 Regionally: Soprano pipistrelles are considered to be widespread and common species of bat, with British data showing species population numbers increasing (Bat Conservation Trust, 2024). Therefore, the roosts are regarded of negligible conservation significance regionally.

5.10 **Conclusion**

5.10.1 Collectively, the development Site has four irregularly used, confirmed roosts of individual, or small numbers, of four different species. Three of those species are common and widespread across North Wales; one species is widespread in many geographies, but not as abundant in all (Whiskered/Brant's bat) (Reason, 2023), and under-recorded (NBMP 2024). Although individually each roost is of low roost significance, it is important to consider the assemblage of bats on a site if multiple species are present, as sites of importance often support several species. Given that the species on site are locally and regionally abundant, that the roosts are day roosts of individual or small numbers of bats, the Site is still considered of low importance locally and of negligible important regionally for its bat assemblage and ecological features (Reason, 2023).

5.11 **Recommendations**

Bats

5.11.1 The proposed works without mitigation or consideration to bats could potentially disturb, modify or destroy known bat roosts and potentially kill or injure individual bats. Without mitigation the risk to individual bats increases but can be reduced to a low level with the implementation and strict adherence to a Method Statement. Roosts R1, R2 and R3 will be destroyed through the development of the outbuilding and Roost R4 will be disturbed. **A European protected species (EPS) mitigation licence from Natural Resources Wales (NRW) is needed** to legitimise the destruction and disturbance of the roosts. This will mean the risk of direct and indirect impacts on bats will be reduced to minimal levels.

5.11.2 The proposed Mitigation Strategy below (to be agreed by Local Authority and NRW) should be adhered to before and during construction works. The Mitigation Strategy may alter in consultation with Local Authority or NRW.

5.11.3 *Mitigation Strategy*

- No works will take place to the property that could affect the bat roost until the European Protected Species Mitigation License has been received.
- Works should commence outside of the bat's peak activity season (May – September). If this is not possible, works will proceed with utmost caution with a licensed ecologist or accredited agent on site following the methodology set out in the EPS license.
- Any external lighting plans should consider the commuting and dispersal routes used by bats. Guidance on lighting schemes can be found in Guidance Note 08/23: Bats and Artificial Lighting at Night (ILP, 2023) or on the Bat Conservation Trust website at www.bats.org.uk.
- A suitable qualified ecologist will be appointed to oversee the works.

- Prior to the commencement of works a toolbox talk will be provided to onsite personal by a NRW licensed ecologist. The talk will include information regarding the protection of species, habitats, legal implications, their responsibilities and what to do if a protected species is encountered.
- A minimum of 1 month prior to the start of works, one bat box (such as Schwegler 1FQ bat box, or similar) will be temporarily installed on the western aspect of Bryn Eglwys. This will provide alternative roosting opportunities during construction. It will also provide a location to put any bats found during construction. When the development is complete, the EPS mitigation licence period has come to an end, and if the box is not in use by roosting bats, it can be removed.
- The proposed works should be avoided for the period of hibernation (when temperatures are consistently below 5°C), although the property provides negligible opportunities for hibernating bats, it does provided opportunities for overwintering bats. If destructive works do have to take place during the hibernation period, they will proceed with utmost caution with a licensed ecologist or Accredited Agent on site. If bats are found work will stop immediately and the licensed ecologist consulted and/or NRW before works continue.
- The initial works will be carried out under "soft works" technique, e.g. removal of roof slates by hand. A licensed ecologist will provide a watching brief during the initial works and will be available throughout construction on an 'on call' basis.
- The integrated bat roost features detailed in paragraph 5.11.6 will be installed during the construction phase. The timing of which is not known at this time. Once the works start they will continue to completion. No gap between the loss of any roosts and the opening of the compensation roosts will take place other then the duration of the construction phase which is estimated to be 6-10months. The roost features will be installed and then sealed to bats to prevent any bat use of the new roosts during the construction phase. The bat features will then be opened upon construction completion.
- If bats or birds, or any other animal are found during works, works must stop immediately, and the site ecologist will be contacted, and advice sought: **Wildbanks Conservation; 01691 623505.**

5.11.4 Planning Policy Wales (PPW12) requires development to provide a Net Benefit to Biodiversity (NBB) i.e. a better outcome than if the site would be left undeveloped. It is also important to acknowledge that roosting habitat loss encompasses not only currently occupied roosts, but also potential and future roost sites.

5.11.5 Three bat roosts have been identified within the building to be renovated and will be destroyed through the proposed works. One bat roost has been identified in the Coach House and will be disturbed during the works. The proposed design of the new property could provide a considerable

amount of light spill through the addition of windows, skylights and patio doors. The positioning of compensatory roost features is such to minimise any light spill onto the roosts or flight paths. It is recommended that three integrated bat roosting features and one wall-mounted bat box is installed to replace roosts atop the wall plate and provide alternative roosting opportunities in line with the scope of the proposed works. The integrated features and bat box will be negligibly affected by internal light spill from windows and doors.

5.11.6 Detailed mitigation for the destruction of 3 bat roosts is as follows and shown on Figures 4 and 5:

- When renovating the internal aspect of the outbuilding, a portion of the external stone/roof mortar on the western gable end verge should be removed to create external bat access to atop the wall plate but not into the property. This creates a like for like roosting opportunity to Roost R3 in very close proximity to its original location with access from the outside rather than from within the shed. The entrance will be approximately 20mm x 100mm.

- Two raised ridge tiles should be installed on the outbuilding to provide bat access on top of the ridge beam/under ridge tiles.

- One wall-mounted Schwegler 1MF swift & bat box, or similar, should be installed on the western aspect of the Coach House at the apex of the gable end. The location of this can be seen on plate 13. It is proposed to be positioned at the apex of the ridge so to be as high as possible. It is acknowledged this is above a small slit within the stonework. This will cause minimal light spill due to the narrowness of the slit and thickness of the wall, therefore, any roosting bats within this box will not be affected and box position is deemed suitable.

Lighting

5.11.7 As stated in the Mitigation Strategy above, any external lighting plans should consider the commuting and dispersal routes used by bats. Guidance on lighting schemes can be found in Guidance Note 08/23: Bats and Artificial Lighting at Night (ILP, 2023) or on the Bat Conservation Trust website at www.bats.org.uk.

5.11.8 Of the recorded species on site; Brown long-eared bat (BLE), Whiskered/Brandt's bat, Common pipistrelle and Soprano pipistrelle, research has shown that Brown long-eared bats and Soprano pipistrelle bats are most affected by artificial light at night around their roost site (BLE and Soprano), flight corridors or foraging areas (BLE only) (ILP, 2023).

5.11.9 To minimise the impact of artificial light at night on any bats roosting onsite, any proposed external lighting will be downlit and will be connected to an internal switch and PIR sensor so that they are not permanently on. Any bulbs will be warm white LEDs to reduce the blue light component of

their discharge light. These light specifications are much the same as currently in use at the Coach House and Bryn Eglwys, therefore, individual bats will be acclimated to these conditions, and they will not create any barriers to roost access or foraging/commuting routes.

5.11.10 Once appropriate mitigation/compensation measures are undertaken, in accordance with the Method Statement, it is unlikely that there will be any significant long-term effect on any individual bats or the conservation status of the species.

Post-construction monitoring

5.11.11 At the time of this Report, a construction schedule is not available, therefore, timing, phasing and duration of construction activities and conservation measures are not known. Mr Andy Burgess will be responsible for implementing all construction and conservation works. He will be responsible for the appropriate engagement of building contractors and licensed ecologist. As well as the application and delivery of the European Protected Species (EPS) mitigation licence from Natural Resources Wales (NRW).

5.11.12 As the EPS Licence applicant, Mr Burgess will also be responsible for the upkeep of the structure and maintenance of any bat mitigation and habitat creation on site. It is proposed that the EPS license named ecologist will undertake a site visit in Years 1 and 2 post-construction, to check the mitigation/compensation are intact and in good condition. Due to the simple nature of the development and the small numbers of low conservation status bats irregularly using the building, no population monitoring is required. This is in line with guidance published in the CIEEM Mitigation Guidelines (Reason, 2023).

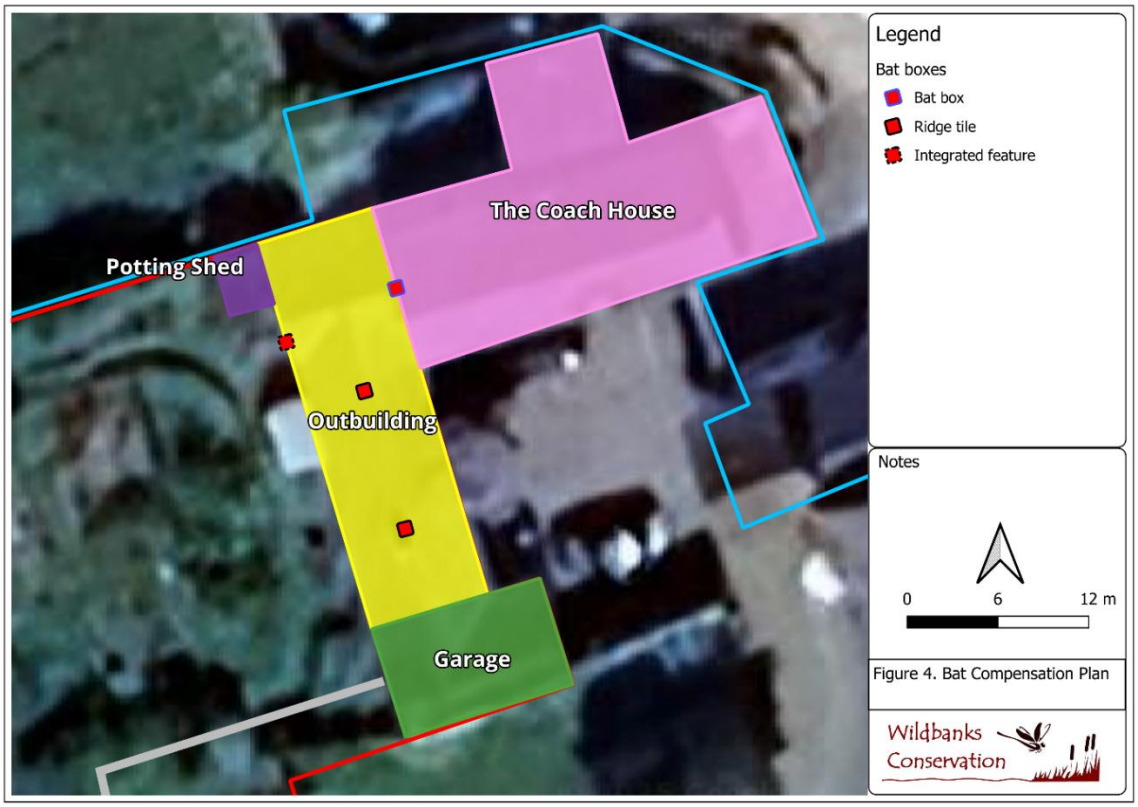


Figure 4. Aerial plan showing location of integrated bat roost feature (red square with black dashed outline), integrated bat access ridge tile (red square with solid black outline) and swift & bat box (red square with blue outline).

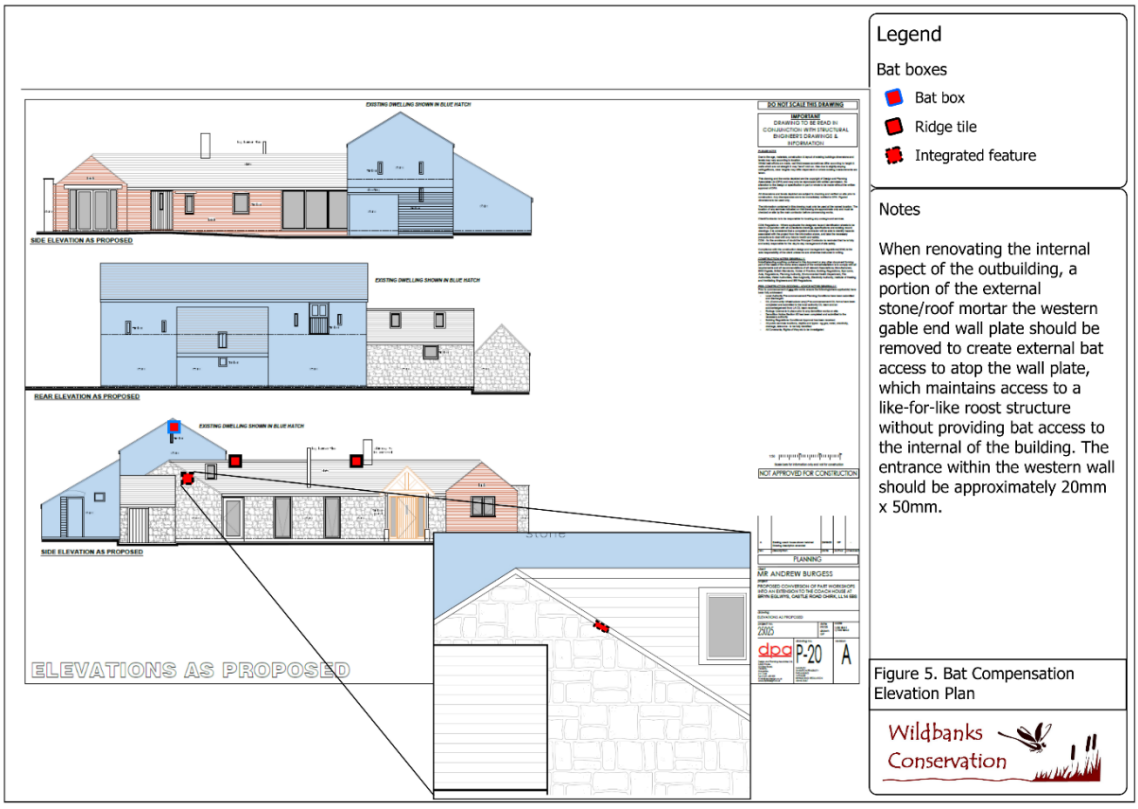


Figure 5. Development plan showing location of integrated bat roost feature (red square with black dashed outline), integrated bat access ridge tile (red square with solid black outline) and swift & bat box (red square with blue outline).

Birds

5.11.13 The disturbance and/or destruction of bird nests is prohibited under the Wildlife and Countryside Act 1981 (as amended). If proposed works commence during the nesting bird season (March-September inclusive), there is potential for nesting birds to be disturbed and nests to be destroyed during the process. To avoid impacts on nesting birds, a pre-works nesting bird check of the Site should be undertaken by a qualified ecologist prior to any works taking place. If nests are identified, the nests must remain intact and undisturbed until young have fledged. No work must take place within 5m of the nest. This will provide a buffer between any works and the nest.

5.11.14 No bird nesting material was identified within the building during the visual inspection, but the proposed works will include destroying bird nesting habitat within the garden (please see paragraph 5.11 and the Green Infrastructure Statement for more details). Along with the Swift box to be installed on the Coach House (see paragraph 5.10.6), two nest boxes will need to be installed within the garden to improve the long-term nesting opportunities for birds on site.

- 2 x 32mm entrance hole boxes

5.12 Green Infrastructure Statement

5.12.1 This report has been prepared in conjunction with a Green Infrastructure Statement. This Statement details the mitigation required for any loss of green infrastructure on Site, including amenity grassland (lawn), trees and shrubs. The Statement also details proposed biodiversity enhancements to the Site in line with NBB, that will benefit bats and birds, as well as other species.

REFERENCES

- Bat Conservation Trust (2024). *National Bat Monitoring Programme Annual Report 2024*. Bat Conservation Trust, London. (Available at https://cdn.bats.org.uk/uploads/pdf/Our%20Work/NBMP/NBMP-annual-report-2024.pdf)

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

- Institution of Lighting Professionals (ILP) (2023) Guidance Note 08/23: Bats and Artificial Lighting at Night. (at https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/)

- Natural England. (2002) *River Dee (England) Citation*. [Available at: https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s2000452]

- Reason, P.F. and Wray, S. (2023). *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats.* Chartered Institute of Ecology and Environmental Management, Ampfield.

A1 APPENDIX – SITE PHOTOGRAPHS



Plate 1: Eastern aspect of the outbuilding showing garage (left) and adjoining area to be renovated (right), both overlooking the courtyard.



Plate 2: Eastern aspect of the building showing where the outbuilding adjoins The Coach House (far right) and overlooks the courtyard. Note location of Roost R4 under raised fascia boards and access point for Roosts R1 – R3 (yellow arrow).



Plate 3: The southern aspect of the garage.



Plate 4: Northern aspect of the Coach House and outbuilding.



Plate 5: Western aspect of the buildings showing potting shed (far left) and main outbuilding to be renovated (right). Location of compensation bat roost shown



Plate 6: Western aspect of the building continued. Location of compensation ridge tile bat roosts shown



Plate 7: Roof was replaced in 2014 and is in great condition. Only few roof slates are raised providing PRFs.



Plate 8: View under fascia board of the outbuilding. Note that it is well-sealed preventing bat access under the roof slates and into the building.



Plate 9: Internal view of northern-most room in outbuilding with open access through archway. Note location of Roost R3.



Plate 10: Numerous PRFs exist in and around the internal timber work of the outbuilding, including atop purlins and rafters.



Plate 11: Internal aspect of the potting shed. Windowpane has slipped creating bat flight access and door is left open.



Plate 12: Bat droppings found inside the potting shed.



Plate 13: Western gable end of the Coach House showing completely intact mortar along the verge and no gaps under the roof or ridge tiles. Location of swift and bat box shown

A2 APPENDIX – FIGURES

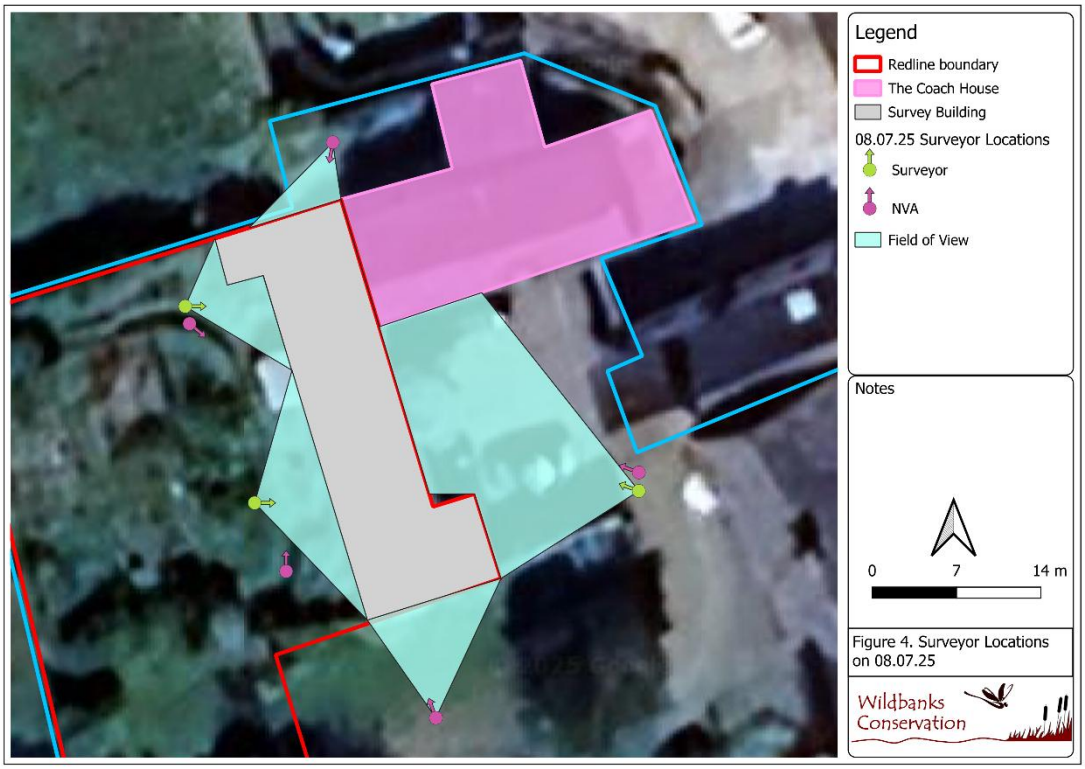


Figure 6. Surveyor and night vision aid locations, and field of view of each, during the emergence survey carried out on 08/07/2025.

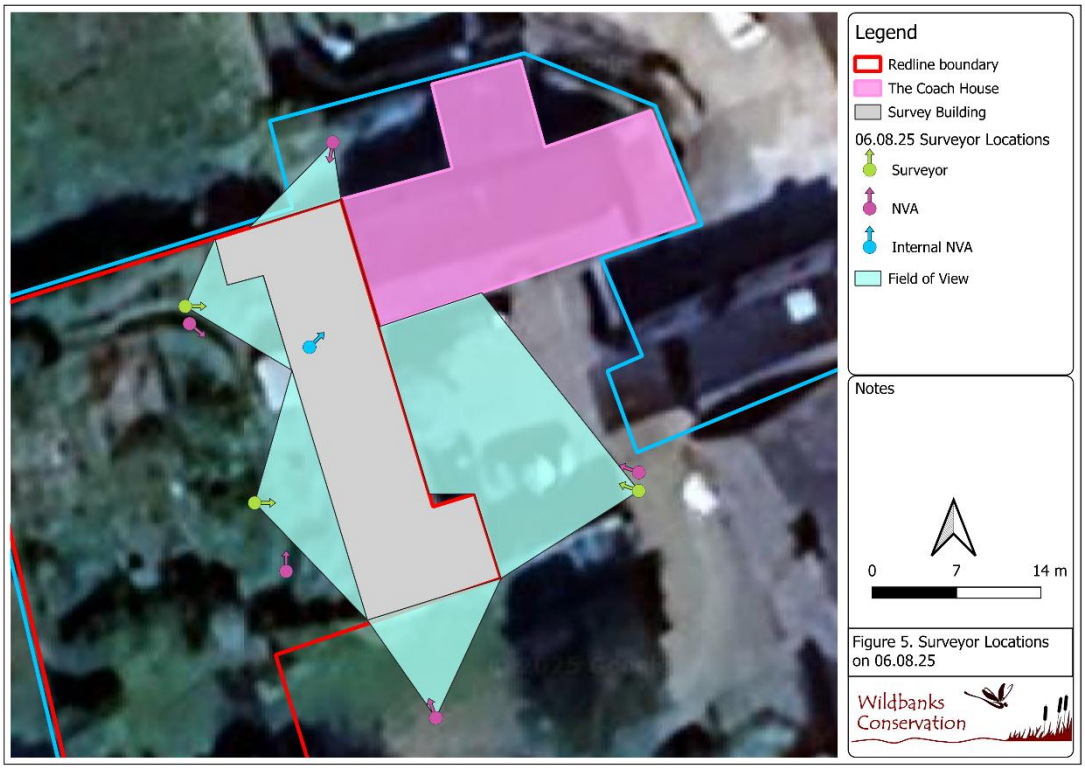


Figure 7. Surveyor and night vision aid locations, and field of view of each, during the emergence survey carried out on 06/08/2025.

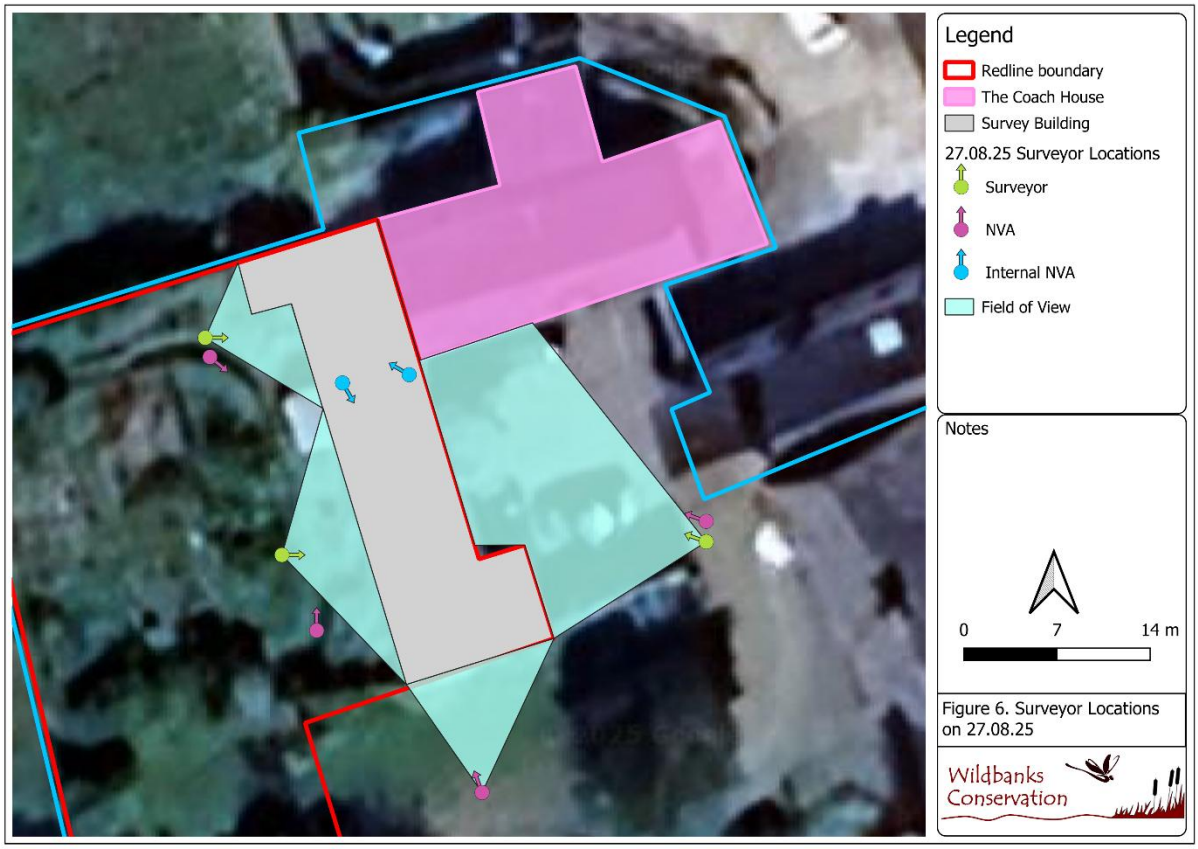


Figure 8. Surveyor and night vision aid locations, and field of view of each, during the emergence survey carried out on 27/08/2025.

A3 APPENDIX – LEGISLATION AND PLANNING POLICY

Bats

A2.1 All bat species are protected by European and/or UK legislation because of their decline across Europe and the UK. When undertaking an appraisal of a proposed development, such legislation is taken into account as follows.

- European: Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive'); and Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds (codified version of Directive 79/409/EEC as amended) (the 'Birds Directive').

- UK (England & Wales): The Conservation of Habitats and Species Regulations 2010, as amended (the 'Habitat Regulations') which transposes the Habitats Directive in UK law; The Wildlife and Countryside Act 1981 (as amended); the Countryside and Rights of Way Act (CRoW) 2000; the Protection of Badgers Act 1992; the Natural Environment and Rural Communities Act (NERC) (2006) and the Environmental Protection Act (EPA) 1990.

A2.2 Species such as bats (all UK species) are also protected in the UK under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended).

A2.3 It is an offence to damage or destroy a breeding site or resting place; intentionally or recklessly damage, destroy, or obstruct access to a place used for shelter or protection and to possess, advertise control, transport, sell, exchange or offer for sale/exchange any live or dead animal, or any part of one, listed in Schedule 5 of the Wildlife and Countryside Act 1981 (as amended).

A2.4 All UK bat species are referred to as European Protected Species (EPS) under the Conservation of Habitats and Species Regulations 2017.

A2.5 If work is proposed that would affect a European Protected Species, then a licence from Natural Resources Wales (NRW) will be required. Natural Resources Wales (NRW), in exercise of the powers conferred under regulation 53(1) and 56(3) (a) of the Conservation of Habitats and Species Regulations 2010, may issue licences for the following purposes:

- Preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;

- Preventing the spread of disease; or

- Preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, growing timber or any other form of property or to fisheries; to allow people to carry out activities which would otherwise be illegal.

A2.6 Before issuing a licence under the Habitats Regulations, the licensing authority must be satisfied that "there is no satisfactory alternative" to the work as proposed and, that the proposed actions "will not be detrimental to the maintenance of the population of the species at a favourable conservation status (FCS)".

A2.7 To ensure these requirements are met, the licensing authority must have enough information to complete an assessment of the application. This includes sufficient survey data so that the roost and how it is used by bats is understood and impacts upon the roost are appropriately assessed so that mitigation and/or compensation can be designed into the proposed development that will ensure the bat population can be incorporated and maintained in the long term.

A2.8 Seven bat species are UK BAP Priority Species. These are as follows:

- Barbastelle *Barbastella barbastellus*
- Bechstein's *Myotis bechsteinii*
- Brown long-eared *Plecotus auritus*
- Greater horseshoe *Rhinolophus ferrumequinum*
- Lesser horseshoe *Rhinolophus hipposideros*
- Common noctule *Nyctalus noctula*
- Soprano pipistrelle *Pipistrellus pygmaeus*

Birds

A2.9 All wild bird species, their eggs and nests are protected under Wildlife and Countryside Act 1981 (as amended). You must always try to avoid harming birds or to use measures which do not kill or injure them before considering taking harmful action.

A2.10 It is an offence to intentionally kill, injure or take wild birds, intentionally take, damage or destroy a wild bird's nest while it's being used or built, intentionally take or destroy a wild bird's egg, possess, control or transport live or dead wild birds, or parts of them, or their eggs, sell wild birds or put them on display for sale, use prohibited methods to kill or take wild birds.

A2.11 Some birds, have additional legal protection under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). For these bird species it is also an offence to disturb them while they're nesting, building a nest, in or near a nest that contains their young or disturb their dependent young.

A2.12 The Birds of Conservation Concern (BoCC5) (Stanbury et al., 2021) is also taken into consideration when undertaking this appraisal.