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Dusk Survey Results

January 2026

Project Reference: PR-0427-24

Pickhill Farm
Cross Lanes
Wrexham
LL13 0UL

National Grid Reference: SJ 39160 47790



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Revision	Date	Amendment
1.1	19/01/2026	Mitigation amended following communication with the applicant

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Executive Summary

As part of a proposed planning application with Wrexham County Council concerning Pickhill Farm (termed 'the site'), Tyrer Ecological Consultants carried out a Preliminary Ecological Appraisal (PEA) in January 2025.

Following the PEA with included Preliminary Roost Assessment (PRA) which categorised building 1 at Pickhill Farm as pertaining to '**High**' bat roost potential, Tyrer Ecological Consultants Ltd were commissioned to undertake the recommended further bat surveys; the surveys, totalling three dusk emergence surveys, were carried out in August & September 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 surveys, the building is ascertained to be host to two day roosts for a single common pipistrelle bat and an individual soprano pipistrelle bat.

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, has been provided in **Section 6.0** of this report.*

Based on an assessment of the roosts present at the site, in accordance with NRW GPG3, the site is considered a lower risk case in that it meets none of the following criteria:

- Maternity roosts of any bat species regardless of the size of the roost. Please note that some species form small maternity roosts. It is therefore essential that sufficient justification is set out in the bat report to support the assessment of the nature of the use of the roost by bats.
- Hibernation roosts of any species.
- Any proposal involving greater horseshoe bat, lesser horseshoe bat, barbastelle bat, Bechstein's bat, grey long-eared bat, Leisler's bat, serotine bat and Nathusius' pipistrelle bat.
- Any proposal involving roost sites for 3 or more different bat species.
- Any mating or swarming site considered to be important on the basis of the submitted bat report.

Incidental Observations

House swallows were observed using the building for nesting purposes.

*Recommendations in relation to mitigation of these species have been provided in **Section 6.0** of this report.*

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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Appendix I: *PR-0427-24 Pickhill Farm – Preliminary Ecological Appraisal V1.1* (Tyrer Ecological Consultants Ltd, Febraury 2025)

1.0 Background & Introduction

1.1 As part of a proposed planning application with Wrexham County Council concerning Pickhill Farm (termed 'the site'), Tyrer Ecological Consultants carried out a Preliminary Ecological Appraisal (PEA) in January 2025.

1.2 The survey was commissioned by Blueprint Architectural Services; proposals are understood to involve the retention of the existing farm house to be improved with extensive internal and external refurbishment. See **Figure 1.1** for a proposed site plan.

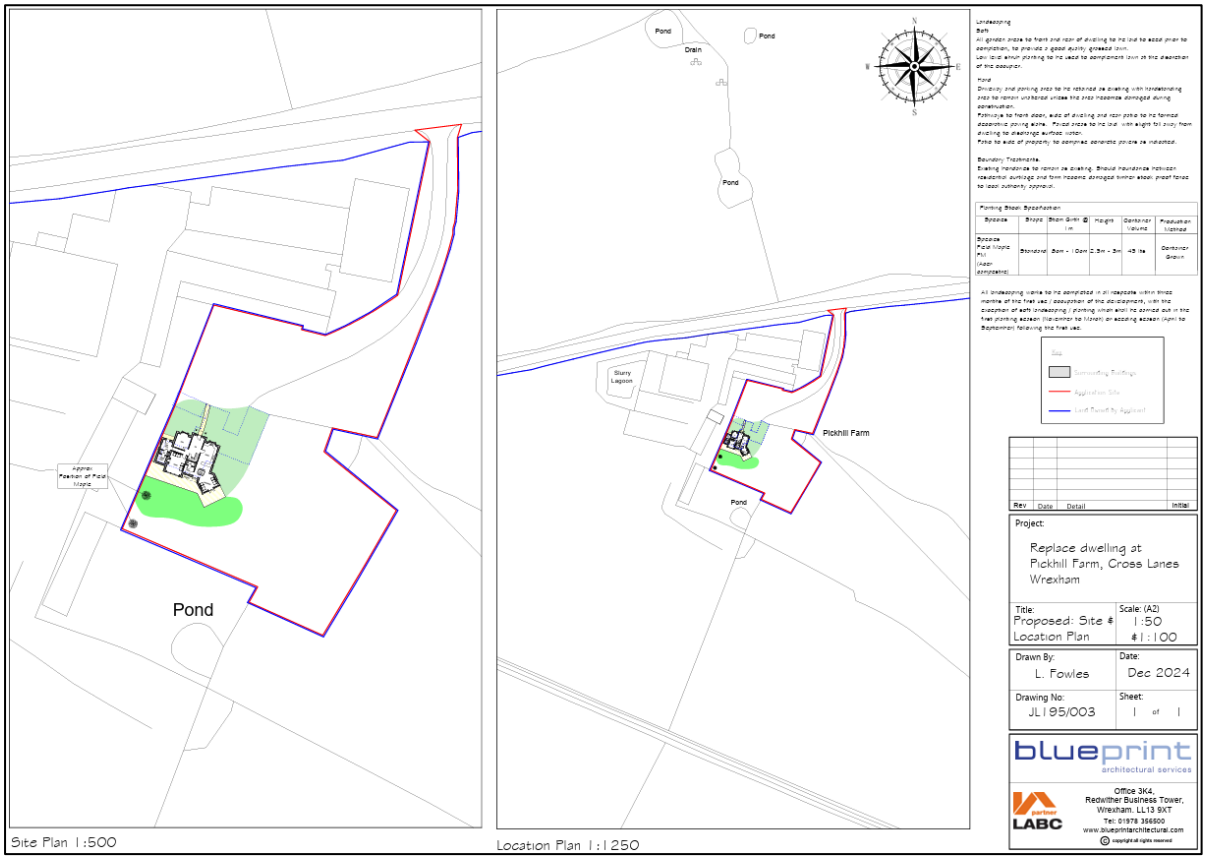


Figure 1.1 – *Proposed: Site & Location Plan © Blueprint Architectural Services*

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, building 1 is duly categorised as pertaining to '**High**' 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 'High' suitability survey implications*

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

1.5 The surveys 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.

1.6 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 12 bat species have been regularly recorded within the vice-county of Clwyd, which includes Wrexham County, to date, many of which use built structures, notably occupied residential buildings, for roosting. The most frequently encountered bat species is the soprano pipistrelle (*Pipistrellus pygmaeus*) and its abundant status in Clwyd 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 Wrexham County Borough Local Development Plan 2013 – 2028, which was adopted in 2022, echoes this national focus on biodiversity within Policy SP14, titled 'Natural Environment', stating:

"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."*

2.15 Further consideration for biodiversity is provided within Policy SP19, titled 'Green Infrastructure', which states:

"Wrexham's distinctive natural heritage provides a network of green and blue infrastructure. Protection, conservation and enhancement of natural heritage networks needs to be reconciled with the benefits of development.

Development will be required to maintain the extent, quality and connectivity of multi-functional green infrastructure on or near a site, and, where appropriate to enhance it by:

i. Creating new interconnected areas of green infrastructure between the proposed site and the existing network;
ii. Filling gaps in the existing network to improve connectivity;
iii. Protecting the features most valuable for both nature and people; and
iv. In instances where loss of green infrastructure is unavoidable, provide mitigation and compensation for the lost assets on a site-specific basis.

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 surveys took place in August & September 2025, thus within the highly active and social breeding season, when young are starting to fly and beginning to feed, although towards the end of this period when bats are starting to disperse and move to transitional roosts prior to the hibernation period.

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 Pickhill Farm 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. **'High'**, and requiring five 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
Mr. J. Hark	6 years	• Consultant Ecologist with a range of training and experience, • BSc (Hons) Wildlife Conservation & Ecology, MSc Wildlife Conservation. • Accredited agent on the Natural Resources Wales Bat Licence of Mrs. K. Wilding (S093795-1).
Mr. D. Burrows ACIEEM	5 years	• Senior Ecologist with a range of training and experience, • BSc in Wildlife Conservation and MSc in Conservation & Biodiversity, • Accredited agent on the Natural Resources Wales Bat Licence of Mrs. K. Wilding (S093795-1).
Mr. H. Mulligan ACIEEM	3 years	• Consultant Ecologist and BNG Lead with a range of training and experience, • MBiolSci in Biological Sciences (Zoology), • Accredited agent on the Natural Resources Wales Bat Licence of Mrs. K. Wilding (S093795-1).
Miss. R. Brown Qualifying CIEEM	2 years	• Consultant Ecologist with a range of training and experience • BSc (Hons.) Environmental Science • Accredited agent on the Natural Resources Wales Bat Licence of Mrs. K. Wilding (S093795-1).
Mr. T. Lefebure Qualifying CIEEM	1 year	• Junior Ecologist with a range of experience and currently undergoing extensive training, • MSc in Environmental Assessment and Management, • Accredited agent on the Natural Resources Wales Bat Licence of Mrs. K. Wilding (S093795-1).
Mr. G. Windle Student CIEEM	1 year	• Junior Ecologist with a range of experience and currently undergoing extensive training, • MSc in Conservation Management (a CIEEM accredited course).
Dr. R. King MCIEEM	15+ years	• Highly experienced seasonal consultant with extensive experience of undertaking professional bat surveys.
Mr. M. Smith	7 years	• An experienced seasonal consultant with extensive experience of undertaking professional bat surveys.
Mr. N. McMahon	1 year	• A seasonal consultant with experience of undertaking professional bat surveys.
Miss. H. Wilkinson	1 year	• A seasonal consultant with experience of undertaking professional bat surveys,

Surveyor(s)	Experience	Surveyor Credentials
		• MSc in Conservation Management (a CIEEM accredited course).
Miss. A. T. Mascarell	1 year	• A seasonal consultant with experience of undertaking professional bat surveys. • MSc in Conservation Management (a CIEEM accredited course).

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 Three dusk emergence surveys were undertaken at the site, during August & September 2025 by five surveyors at any one time. **Table 4.1** shows survey timings and weather conditions, whilst **Table 4.2** alongside **Figures 4.1 – 4.6** document the results of the surveys.

Table 4.1 – Survey date, times and weather conditions

Times of Survey	Date	Weather Conditions
Dusk survey 1 2040 - 2230	04/08/2025	**Sunset: 2100:** Dry, Light breeze (2/12 Beaufort), 10% cloud cover Start temp: 16ºC End temp: 15ºC
Dusk survey 2 1958 - 2148	25/08/2025	**Sunset: 2018:** Dry, Warm, Gentle breeze (3/12 Beaufort), 10% cloud cover Start temp: 23ºC End temp: 22ºC
Dusk survey 3 1906 – 2056	16/09/2025	**Sunset: 1926:** Dry, Light breeze (2/12 Beaufort), 40% cloud cover Start temp: 15ºC End temp: 13ºC

Table 4.2 – Dusk survey results

Survey Dates	Time	Activity
04/08/2025	2040 - 2230	**Summary: Emergence of a single common pipistrelle bat from the wall plate behind the guttering beneath the overhanging roof on the southern corner of the building (EP1) and the emergence of an individual soprano pipistrelle from beneath a slate on the south-eastern gable verge of the structure (EP2).** 2117 hrs: A common pipistrelle (CP) bat emerged from the wall plate behind the guttering beneath the overhanging roof on the southern corner of the structure and flew north along the eastern elevation of the building (EP1). 2120 hrs: A soprano pipistrelle (SP) commuted along the eastern elevation in a southern direction and then over the building to the north. 2128 hrs: A SP emerged from beneath a slate on the south-eastern gable verge of the building and commuted north (EP2). 2131 hrs: A CP commuted along the western elevation of the building and headed to the north-west of the site. 2131 - 2135 hrs: A noctule (Noc) was sporadically heard not seen (HNS). 2141 hrs: A SP foraged along the western elevation of the building.

Survey Dates	Time	Activity
		2142 hrs: A SP commuted along the northern elevation round to the eastern vegetation. A SP commuted from the west to the south. 2145 hrs: A SP commuted from the north to the south on the eastern aspect of the site. 2146 - 2157 hrs: A SP occasionally foraged within the eastern garden and along the western elevation of the building. 2154 hrs: A SP commuted over the building in a north-western direction. 2208 hrs: A myotis spp. commuted along the eastern elevation of the building. 2215 - 2217 hrs: A CP occasionally commuted round the southern aspect of the building heading west. General activity comprised of occasional foraging and commuting by a single common pipistrelle and soprano pipistrelle bat, alongside sporadic passes by a Noctule and myotis spp. bat. *Incidental Observation*: *House sparrows were observed actively nesting within stonework beneath guttering on the western elevation of the central aspect of the building.*
25/08/2025	1958 - 2148	**No emergences recorded of any bat species from the target structure during the survey period.** 2034 hrs: A common pipistrelle (CP) commuted from the eastern elevation to west and then over the building. 2046 - 2049 hrs: A soprano pipistrelle (SP) constantly foraged in the eastern garden. 2052 - 2053 hrs: Up to two SP bats foraged in the eastern garden and commuted over the building from the southern elevation to the north. 2056 hrs: A SP was heard not seen (HNS). 2106 - 2117 hrs: A CP was sporadically HNS. 2113 hrs: A CP foraged along the southern elevation from the west and back. 2120 hrs: A SP commuted from the southern elevation to the south-western aspect of the site. A brown long-eared (BLE) bat was HNS. 2121 - 2123 hrs: A SP occasionally foraged in the northern courtyard and within the southern vegetation. 2135 - 2139 hrs: A soprano pipistrelle and a noctule bat were sporadically HNS.

Survey Dates	Time	Activity
		General activity comprised of occasional foraging and commuting by up to two soprano pipistrelle bats, an individual common pipistrelle bat and sporadic passes by a noctule and brown long-eared bats.
16/09/2025	1906 – 2056	**Summary: Emergence of a single common pipistrelle bat from the wall plate behind the guttering beneath the overhanging roof on the southern corner of the building (EP1) and the emergence of an individual soprano pipistrelle from beneath a slate on the south-eastern gable verge of the structure (EP2).** 1929 hrs: A noctule (Noc) bat was heard not seen (HNS). 1944 - 1949 hrs: A soprano pipistrelle (SP) frequently foraged along the eastern elevation round to the southern aspect and back and from the northern side of the structure to the east and back. 1945 hrs: A SP emerged from beneath a slate on the south-eastern gable verge of the building and commuted north (EP2). 1947 hrs: A common pipistrelle (CP) emerged from the wall plate behind the guttering beneath the overhanging roof on the southern corner of the structure and flew north along the eastern elevation of the building (EP1). 1955 - 2001 hrs: A SP was sporadically HNS. 2009 hrs: A SP commuted from the north to the south of the structure and back along the western elevation of the building. 2011 - 2026 hrs: A SP frequently foraged around the northern courtyard and building perimeter including the eastern and southern elevation and sporadically commuted over the building in a south to north direction. 2027 hrs: A brown long-eared (BLE) bat briefly foraged in the northern courtyard adjacent to the structure 2028 - 2038 hrs: A SP frequently foraged within the northern courtyard and along the eastern elevation and over the building from a south to north direction. 2039 - 2043 hrs: Up to two SP foraged along the eastern elevation round to the southern aspect of the structure and back. 2041 - 2043 hrs: A BLE was sporadically HNS. 2041 - 2051 hrs: A SP occasionally foraged within the northern courtyard and the building perimeter. General activity comprised of frequent foraging by up to two soprano pipistrelle bats, and sporadic passes by a brown long-eared and noctule bat.



Dusk Survey 1 – 04/08/2025

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

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



Dusk Survey 2 – 25/08/2025

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

Figure 4.2 – *Visual Aid – Dusk survey results with Key*



Dusk Survey 3 – 16/09/2025

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

Figure 4.3 – *Visual Aid – Dusk survey results with Key*

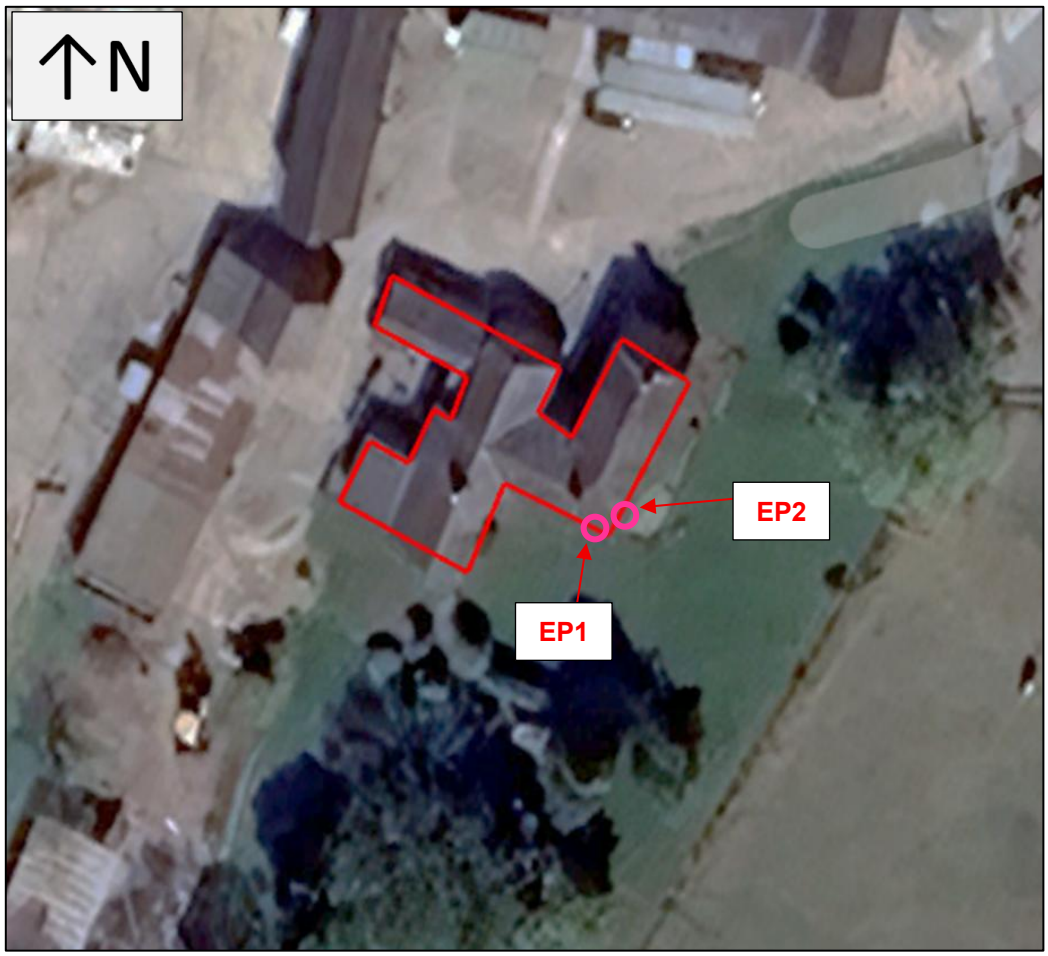


Figure 4.4 – *Location of emergence points © Google Earth Pro 2025.*



Figure 4.5 – *Location of Emergence Point 1 on southern elevation behind guttering of overhanging roof (EP1)*



Figure 4.6 – *Location of Emergence Point 2 on south-eastern gable verge beneath slate (**EP2**).*

Incidental Observations

4.2 House sparrows (*Passus domesticus*) were observed actively nesting within the stonework beneath the guttering on the western elevation of the central aspect of building 1. As such, the use of the building by house sparrows for breeding and nesting purposes is considered to be confirmed. See **Figure 4.7** overleaf for location of observed nesting behaviour.

NB: *All wild birds (with only minor exceptions) and their nests whilst being built or containing eggs or dependant young are protected from destruction, damage and disturbance under the Wildlife & Countryside Act 1981 (as amended). It is a punishable offence to interfere in any way with an active nest*



Figure 4.7 – *Location of observed nesting behaviour © Google Earth Pro 2025.*

5.0 Conclusions & Recommendations

5.1 Based on the results gathered during the dusk surveys, the building is ascertained to be host to two day roosts for a single common pipistrelle bat and an individual soprano pipistrelle bat.

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 Pickhill Farm

Structure Reference	Species	Count	Roost Location	Access Points	Site Status Assessment	Conservation Significance
B1 at Pickhill Farm	Common pipistrelle	1	Atop wall plate on southern elevation	EP1 – behind guttering on southern elevation of the building beneath overhanging roof	Day	Site
B1 at Pickhill Farm	Soprano pipistrelle	1	Crevice beneath slate	EP2 – gap beneath slate on south-eastern gable verge	Day	Site

5.4 Based upon Natural Resources Wales guidance[2], the proposed works represent a "Lower risk case" as it meets none of the following criteria:

- Maternity roosts of any bat species regardless of the size of the roost.
- Hibernation roosts of any species.
- Any proposal involving greater horseshoe bat, lesser horseshoe bat, barbastelle bat, Bechstein's bat, grey long-eared bat, Leisler's bat, serotine bat and Nathusius' pipistrelle bat.
- Any proposal involving roost sites for 3 or more different bat species.
- Any mating or swarming site considered to be important on the basis of the submitted bat report.

5.5 Proposals are understood to involve the renovation of the existing farm house to include significant internal and external refurbishment.

5.6 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

[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
[2] See: https://cdn.naturalresources.wales/5436/gpg-3-nrw-approach-to-bats-and-planning-english.pdf

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.**

5.7 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.

5.8 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 common pipistrelle and soprano pipistrelle 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 Natural Resources Wales 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 on site set to be subject to significant internal and external renovations, it is acknowledged that the presence of roosting bats needs to be addressed from both a legal and conservation perspective. For the purposes of this report**, it is considered that the roosts will be subject to destruction**; as such, there is a necessity to consider alternative solutions.

6.8 The mitigation proposals outlined in this report are seen 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 throughout the site, however, were primarily found to be round the perimeter where taller vegetation and hedges are present and over the building, where illumination is broadly absent. It is considered that areas of taller vegetation are to be

retained following development, with additional garden landscaping further increasing the value of the area to foraging and commuting bats. As such, the works are considered to entail a net neutral – positive impact on the commuting routes to the boundaries of the site.

6.10 The grassland, hedgerow and individual trees to the southern and western aspect of the site provide moderate foraging value habitat which presents an invertebrate prey source and structural focus for bats to navigate and foraging by. While the majority of this vegetation is to be retained, areas of grassland are to be loss, and it is considered that renovation of the farm house may likely increase light spillage on areas that were previously unilluminated. As such, it is considered that this may impact foraging bats in the landscape, both directly through loss of habitat and 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, two tree-mounted receptor roosts will need to be installed at the site. The tree-mounted boxes should be a Schwegler 2F[3] (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 roosts 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 (see **Figure 6.1** overleaf).

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.

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. Individual bats will sometimes utilise non-traditional hibernation sites on an occasional basis, including loft spaces or external crevices on buildings. In the unlikely event that hibernating

[3] See: https://www.wildcare.co.uk/bat-box-45.html

bats are discovered during the works, the works will immediately stop and the area the bat was found will be made good. No hibernating bats will be moved.

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 Two day roosts with two identified access points were identified on site, which will be destroyed during the proposed works. As the existing building which is host to the roost will be subject to significant renovations, which is likely to include re-roofing of the structure, retention or modification of the identified roosts are 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 existing dwelling during renovation works. The following measures will be undertaken at the site, integrated into the retained dwelling, in tandem with the proposed retention of the receptor roosts:

- One integrated Ibstock Enclosed Bat Box 'C'[4] (or suitable equivalent, to be agreed by the express consent of the ecologist) in a suitable location on the rear, southern elevation of the dwelling, to remain unilluminated and to have favourable commuting pathways to foraging grounds in the wider area. The landing pad should be 'roughed' to ensure that bats are able to grip the surface.



[4] See: https://www.nhbs.com/ibstock-enclosed-bat-box-c

- Integration of bespoke ridge tile access on the southern aspect of the roof, located as to best mimic the existing roost location. For this mitigation, a gap of approximately 20mm deep x 100mm long will be created along the ridge to allow bat access. As the roof is set to be lined with a Breathable Roofing Membrane (BRM), a one metre, horizontal section of traditional bitumen type 1f underfelt will be installed to provide a bat-safe area beneath the ridge. This section will be securely mortared in with the ridge tiles placed back on top with a gap left to provide access. It is imperative that this section with bitumen felt is securely fixed to ensure there are no points of access to the rest of the roof, so bats cannot access the BRM lining. Modern BRM linings can entrap bats through wear and tear in the synthetic polymers used to protect the breathable membrane causing bats harm, injury and death. **It is for this reason that the ridge tiles should be securely fixed to ensure no access points to the rest of the roof given the roof will be lined with a breathable roofing membrane.**
- See **Figure 6.1** below for an example of this mitigation measure.



Figure 6.1 – *Example of ridge tile access mitigation measure*

6.23 See **Figure 6.2** overleaf for the location of the proposed mitigation and receptor roost measures on site.



Figure 6.2 – *Proposed location of receptor roosts and mitigation measures over relevant satellite imagery © Google Earth Pro 2025.*

6.24 This mitigation proposed is subject to the approval of the NRW EPS team who may influence the terms of this mitigation; all proposed roost provisions outlined hereafter will be dedicated for bats and permanent.

6.25 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.

6.26 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.

6.27 Given that the breeding presence of house swallows within building 1 is confirmed, the significant renovation of this structure has the potential to impact a nesting site. As such, the renovation of the building will need to commence outside of the breeding season typically considered March – August, inclusive. For works within the breeding bird season, any areas that can support nesting birds should be checked by a professional Ecologist for nesting birds within 48 hours or less prior to works commencing.

Point 3.24 of the British Standards Publication 42020:2013 defines a professional ecologist as: *"a person who has, through relevant education, training or experience, gained recognised qualifications and expertise in the field of ecology and environmental management."*

6.28 Where / if active nests are / have been located by the Ecologist, then any works which may affect them would have to be delayed until the young have fledged and the nest has been abandoned naturally, this can be aided, for example, via implementation of appropriate buffer zone(s) around the nest site (typically 5 – 10 metres) in which no disturbance is permitted until the nest is no longer in use. This would have to be coordinated through the expert judgement of the professional ecologist and species pending. Additionally nesting provision will need to

be incorporated into an open store/port/car port for example with the inclusion of appropriate bird boxes to mitigate for the loss of nesting sites.

7.0 References

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Appendix I: *PR-0427-24 Pickhill Farm – Preliminary Ecological Appraisal V1.1* (Tyrer Ecological Consultants Ltd, February 2025)