**Springfield Flats and Cunliffe Centre**

Rhosddu Road, Wrexham LL11 2NU

# Preliminary Roost Assessment & Bird Nesting Survey Report

18th December 2025



Produced by Wildbanks Conservation

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**REPORT VERIFICATION AND DECLARATION OF COMPLIANCE**

| Report Version | Date | Completed by: | Date: | Approved by: |
|---|---|---|---|---|
| Final | 18/12/2025 | Tanya Cobb | 18/12/2025 | M. Smith |

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 Preliminary Roost Assessment & Bird Nesting Survey Report has been prepared on behalf of Wrexham County Borough Council and provides the results of a Preliminary Roost Assessment (PRA) and Ground Level Tree Assessment (GLTA) of Springfield Flats and Cunliffe Centre, Rhosddu Road, Wrexham LL11 2NU (approximate OS Grid Ref: SJ 33199 51058) on 21st November 2025, as well as an assessment for the site's potential use by breeding birds.

1.2 The PRA, and GLTA, were required to establish the presence or absence of roosting bats within any buildings, establish if any trees on site have potential to host roosting bats, identify potential constraints to the proposal, and outline the requirement for further surveys and/or any mitigation measures that might be needed, 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, without potentially breaking the law.

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 site in question comprises two detached buildings and two blocks of garages and from this point on referred to as the "Site". The Site is defined by the redline boundary shown on Figure 1. The buildings are being demolished, and a new residential development is proposed within the redline boundary. A substation also exists on site; this is not being demolished but has been assessed for bat roost and bird nesting potential.

## 2.0 SITE DESCRIPTION

2.1 The Site is located off Rhosddu Road, approximately 1.0 km north of Wrexham town centre. The immediate habitat is dominated by areas of residential and commercial development with associated infrastructure, sporadic green spaces and play areas. This immediate habitat surrounding the site is considered to be of low value to bats.

2.2 The wider landscape incorporates expanses of continuous development in the form of the wider towns and villages surrounding Wrexham City Centre, interspersed with areas of woodland and farmland. The habitat in the wider landscape is considered to be of low-moderate potential value for bats.

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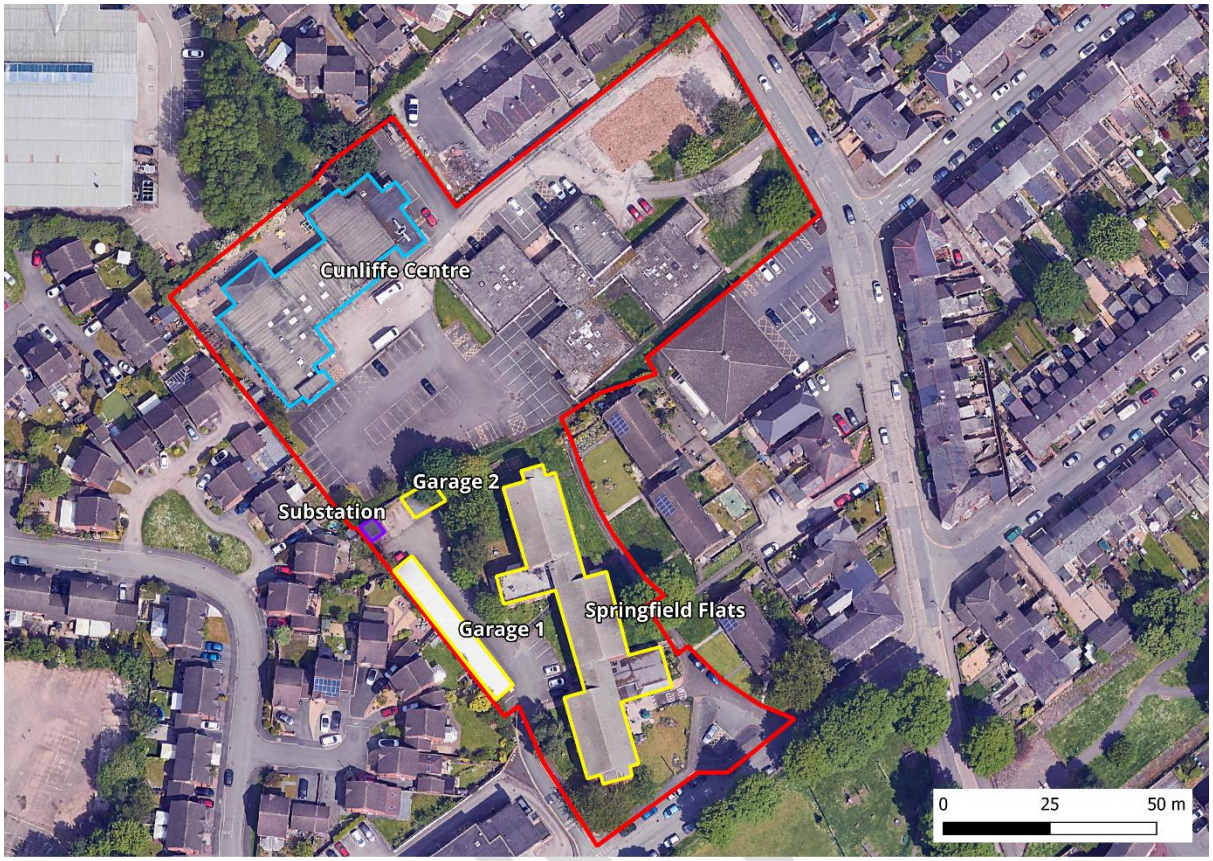



**Figure 1.** Aerial map showing development boundary outlined red. (Imagery ©2025 Airbus, Bluesky, Infoterra Ltd & COWI A/S, Maxar Technologies, Map data ©2025)




**Figure 2.** Aerial map showing property boundary outlined red and wider landscape. (Imagery ©2025 Airbus, Bluesky, Infoterra Ltd & COWI A/S, Maxar Technologies, Map data ©2025)

## 3.0 SURVEY METHODOLOGY

3.1 To inform this Preliminary Roost Assessment & Bird Nesting Survey Report, a desk-top study, Visual Assessment and Ground Level Tree Assessment (GLTA) were undertaken 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 were visually assessed for Potential Roost Features (PRFs), potential access points and evidence of bat activity on 21st November 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 **Ground Level Tree Assessment**

3.4.1 All trees located within the proposed development area or immediately adjacent were included in the assessment. Numbering of trees was consistent with the number sequence used in Marches Ecology's Preliminary Ecological Appraisal (PEA) (In progress) for their site Target Notes. Any unnumbered trees were numbered in sequence and chronologically in this Report.

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3.4.2 Trees were initially classified during the walkover survey into three broad categories:

- None – No features of interest or potential use by bats.
- FAR (Further assessment required) – Further assessment required to establish if PRFs are present in the tree.
- PRF (Potential Roost Features) – Trees showing features likely to be used by bats, as defined in the BCT Guidelines.

3.4.3 Further assessment undertaken on trees categorised as FAR or PRF included using ladders, binoculars, high-lumen torches, inspection mirrors and endoscopes, where possible. Features such as rot holes, hazard beams, woodpecker holes, lifted bark, vertical cracks, dense ivy, or callus formations were recorded and evaluated. Trees were then re-classified according to bat roost potential as follows:

- Negligible – No suitable PRF observed.
- PRF-I (Individual use) – Small, isolated PRF suitable for single or small numbers of bats.
- PRF-M (Multiple bats) – Larger, more sheltered features potentially suitable for group or maternity roosts.

3.4.4 Any direct evidence of bat use—such as droppings, staining, feeding remains, or live bats—was noted. Conversely, the presence of dense cobwebs or detritus obstructing PRF entrances was used to infer likely absence of recent use.

## 3.5 Limitations

3.5.1 There were no significant limitations to the visual assessment. The PRA was carried out in November, which is outside the main activity season for bats (May to August). As such any signs of bat activity from the previous year's bat season may have been washed away by weather.

3.5.2 Springfield Flats is three storeys, so areas of the roof and external brickwork could not be fully inspected from the ground, due to its height, however, the whole roof was constructed at the same time, therefore, the condition of the portions of the roof that were inspected from vantage points, is assumed indicative of the entire roof. Internally, access into all the loft space was possible.

3.5.3 The whole exterior of the Cunliffe Centre was visible during the Visual Assessment. Access internally was limited due to the building currently being in use as an adult care facility. A boiler room and loft crawl space were unable to be accessed at the time of the Visual Assessment.

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3.5.4 GLTAs are an approximation of bat roosting potential due to not all PRFs potentially being visible from the ground and the extent of each feature cannot always be established accurately. Assessments were undertaken in winter whilst the trees were not in leaf, therefore, maximum visibility of PRFs from the ground was available.

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

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# 4.0 RESULTS

## 4.1 Desk Top Study

4.1.1 A COFNOD data search was undertaken, the results of which are detailed in Marches Ecology PEA (In progress). Results of note in relation to bats and birds include:

- **14 records for bat (species/families)** including Common pipistrelle *Pipistrellus pipistrellus*, Soprano pipistrelle *Pipistrellus pygmaeus*, Noctule *Nyctalus noctula*, Brown long-eared *Plecotus auritus* & *Pipistrelle* bat. The closest record was 465m west of the Site and do not impact the proposed development.

- **30 records for Schedule 1 birds** including Redwing, Fieldfare, Red Kite, Firecrest, Kingfisher, Goshawk, Peregrine, Hobby, Brambling, Common Scoter and Whimbrel. All records were greater than 500m from the Site and do not impact the proposed development.

- **111 records for bird species protected under Section 7 of the Environment (Wales) Act 2016 including**: Kestrel, Herring Gull, House Sparrow, Bullfinch, Starling, Black-headed Gull, Dunnock, Reed Bunting, Linnet, Spotted Flycatcher, Song Thrush, Lesser Redpoll, Skylark, Lesser Spotted Woodpecker, Common Scoter and Cuckoo. Records of the underlined species above were returned within 500m of the Site, and although these results do not impact the proposed development, this information can be used to inform compensation and enhancement recommendations to conserve and uplift local populations of species of principal importance for enhancing biodiversity in Wales.

4.1.2 One statutory designated site exists within 2km of the Site.

- Gatewen Marsh SSSI

  A significant example of "southern mesotrophic mires" wetland, not often found in Northeast Wales and categorised by its wetland vegetation. The site occupies the flat valley bottom of a tributary of the River Gwenfro and bounded by the spoil banks of the former Gatewen Colliery. (NRW, 1986).

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

## 4.2 Building Visual Assessment

*Bats*

4.2.1 The Site consists of five buildings (Figure 1), hard-standing carparks, mature trees, and amenity grass areas.



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4.2.2 Springfield Flats: This building is a three storey, double-skinned, brick building with a pitched concrete tiled, roof (Plates 1-3). The main entranceway on the southeastern aspect of the building is one storey with a flat roof, and a block to the west of the building is two storeys with a flat roof. The flats within the building was up until recently fully inhabited by residents, currently two residents still live on Site. The internal rooms and hallways of the building are boarded, plastered, painted and well maintained as living accommodation (Plate 9). An inspection of all internal flats was not carried out due to their recent occupancy. The external of the building is in relatively good condition with potential roost features (PRFs) for crevice dwelling bats (e.g., *Pipistrelle sp., Myotis sp.*) found across the building, however, no access for free flight species, such as Brown long eared bats, were identified during the Visual Assessment.

4.2.3 Gaps suitable for roosting bats exist under the fascia boards of several of the gable end walls (Plate 3). These areas were investigated internally within the loft space, and the construction of the roof does not allow bats to gain access into the loft space via these gaps under the fascia boards as the internal timber- and blockwork has been filled with expanding foam (Plate 11) in all locations. Holes exist within portions of the soffit box around protruding pipework (A on Figure 3; Plate 5). Along multiple aspects of the building, the brickwork contains holes into the wall cavity through removal of pipework or broken vents (Figure 3 – B; Plate 6). No evidence of bat use was seen around any of these holes e.g. staining, however, most were at a height that could not be fully investigated from the ground. Brickwork is broken and missing from the corners of the one storey portion of the building creating bat access to atop the wall plate (Figure 3 – C; Plate 7). The roof is in good condition with no obvious raised tiles or ridge tiles through its entirety (Plate 8).

4.2.4 The loft space spans the entire footprint of the building but separated into enclosed rooms, accessible by several different loft hatches from the corridors. Potential bat flight is not continuous through the entire length of the loft. No evidence of bat use was found within the loft e.g. droppings. The roof is lined and in excellent condition, as such no bat access into the loft space from under the roof tiles is possible (Plate 10). Small amounts of light ingress was present in loft spaces 2 and 4 through gaps around ventilation pipes (Figure 3 – D). These gaps were too small to offer bat access into the loft.

4.2.5 The lack of bat access into the loft space and the well-maintained nature of the building means that the building has no opportunities for hibernating bats.

4.2.6 Springfield Flats is **overall categorised as having low potential for roosting bats**, with the majority of PRF's associated with the external brickwork.

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**Figure 3.** Map of Springfield Flats showing notable Potential Roost Features (PRFs).

4.2.7 Garages: Garages were assessed externally only. Garage block 1 and 2 are both brick constructions. The brickwork on both garages is in good condition with no cracks or gaps. No cracks or gaps exist beneath the barge board on either end of the garages. Garage 1 has a corrugated metal roof (Plate 12) and Garage 2 a flat felt roof (Plate 13). Bat access into some of the garages in Garage 1 can occur through small gaps above the garage doors, however, due to the corrugated roof structure providing an unstable thermal regime, good condition of the brickwork and simple roof construction there is likely to be negligible PRFs internally. No PRFs were present on Garage 2. Both garage blocks are therefore, categorised as **having negligible potential for roosting bats.**

4.2.8 Substation: This building is brick built with flat, felt roof and is in very good condition (Plate 14). No gaps exist within the roof structure. A louvre vent in present on the northeastern aspect of the building, but is internally lined with mesh, preventing bat access. No PRFs are present within this building and is therefore, categorised as **having negligible potential for roosting bats.**

4.2.9 Cunliffe Centre: This building is a single storey brick building with partial shiplap PVC cladding and flat roof (Plate 15). One portion of the building to the northwest has a pitched roof (Plate 16). Two sheds are located to the southwest of this building that do not provide any PRFs.

4.2.10 The roof structure is well-sealed to bats. Timber sits flush to the top of the wall plate, and the roofing felt is wrapped around this timber and overhangs adjoining a wooden batten creating no

gap or crevice (Plate 17). The top third of the walls are clad with PVC cladding; joins between PVC cladding and brick walls were mostly well-sealed and intact. Where gaps exist, they are too narrow to be suitable for bats. Portions of PVC cladding was missing along the northeastern corner of the building, but this created gaps too exposed and large to shelter roosting bats (Plate 18). Two holes in the PVC cladding were present from breaks in the PVC, but both holes were ruled out as potential roost features due to the thermal instability of the PVC material, the height of the holes being only 2.4m above ground level which is generally unsuitable for bats, and the batten layout behind the cladding i.e. vertical battens with horizontal one at the top of the cladding, does not allow bats to migrate from any holes to atop the wall plate. The windows and doors present also do not provide cracks or gaps around them suitable for hosting roosting bats or providing potential access into the brick wall cavity. Few cracks and holes in the brickwork exist, all but one show evidence of spider use (Plate 19), however, a substantial crack is present in the chimney stack caused by a tree sapling growing in the roof. This was ruled out as a potential roost feature as its opening and upwards facing allowing rainwater into the opening (Plate 20).

4.2.11 The building is currently in use as an adult care facility; therefore, the internal aspect is well maintained, plastered and painted (Plate 21). The internal of the building has a suspended ceiling. The crawl space in the ceiling was not accessible during the visual assessment, but no potential access points were observed externally to allow access for bats into this space.

4.2.12 A boiler room with external door access was present and this was inspected for bat roost potential. The boiler room was accessible via louvre door. There was no mesh covering the louvre gaps, however, looking inside, the room was plastered and painted, with no gaps or broken brickwork to provide features that could be used by roosting bats.

4.2.13 The overall structure of the Cunliffe Centre e.g. no loft space, and lack of suitable features mean that the building has no opportunities for hibernating bats.

4.2.14 Cunliffe Centre is **overall categorised as having negligible potential for roosting bats**.

*Birds*

4.2.15 No evidence, historic or recent, of nesting or roosting birds was found on or inside any of the five buildings on Site.

4.2.16 The flat roof of Cunliffe Centre could not be inspected from the ground but has potential for nesting gulls. The roof is exposed to weather and predators which lowers its bird nesting potential; however, bird nesting potential cannot be ruled out.

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## 4.3 Ground Level Tree Assessment

4.3.1 All trees within the Site were assessed and twenty-two trees have been identified for their suitability for bats (Table 1). Upon investigation, eleven trees have been identified as having potential bat roost features, therefore, requiring further surveys/inspections, in the form of Aerial Tree Inspections (ATI), before they can be felled (if felling is necessary) (Figure 4). Appendix A2 contains photos of all trees with PRFs.

4.3.2 All potential roost features were categorised as PRF-I, indicating they are only suitable for an individual or very small numbers of bats.

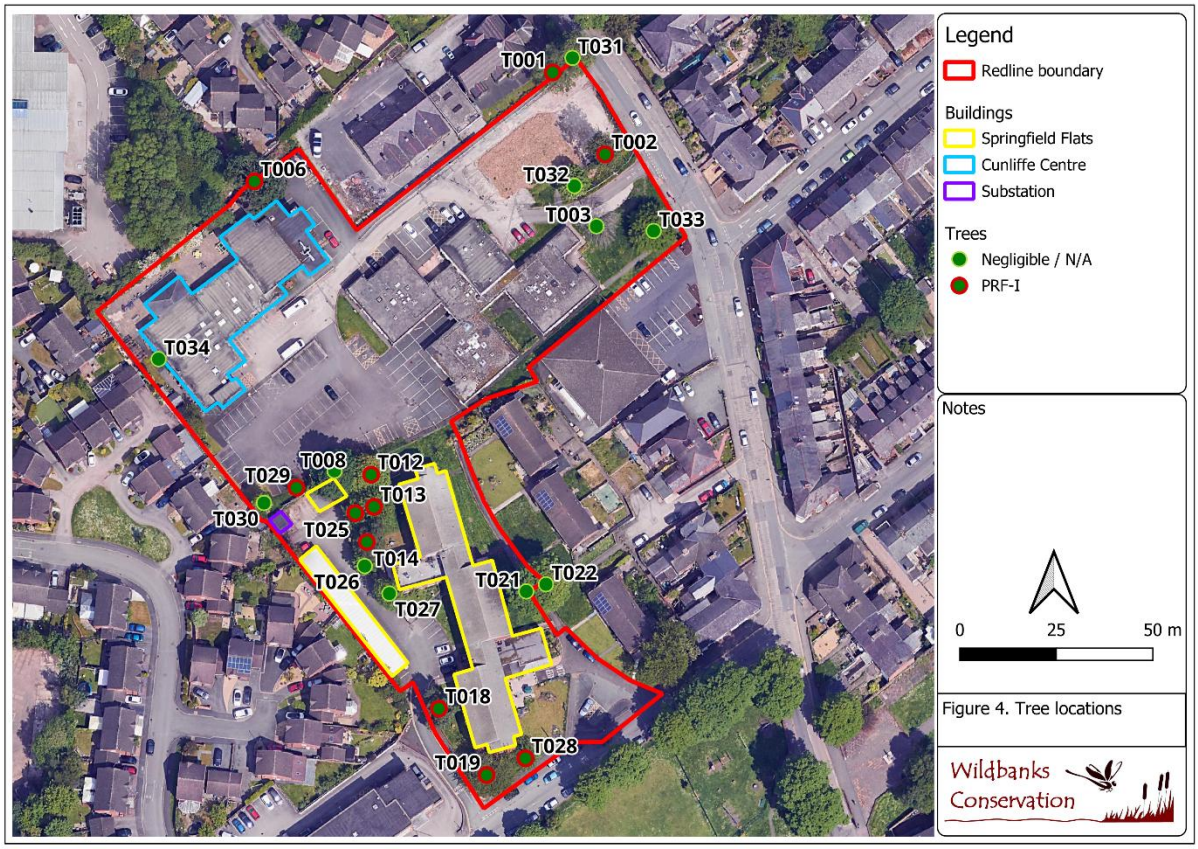



**Figure 4.** Map of trees identified as having Potential Roost Features (PRFs).

**Table 1:** All trees identified within the redline boundary assessed for their suitability for bats. Eleven trees (highlighted pink) were identified as having a PRF(s) requiring further investigation before felling or disturbing operations can take place.

| Tree Number | GPS Coordinates | | Tree species | Initial GLTA Category | Description of Tree/PRF | GLTA PRF category (post inspection via ladders, binoculars, endoscopes etc.) |
|---|---|---|---|---|---|---|
| | Easting | Northing | | | | |
| T001 | 333249 | 351137 | Silver birch | FAR | Tree with six potential roost features. Three were ruled out due to cavities being too shallow or supporting branch too small.<br><br>Three features in the form of sparse Ivy cover, upwards facing branch cavity and branch cavity with associated peeling bark obscuring full extent of feature will need to be inspected before any felling or pruning works are due to take place. | PRF-I |
| T002 | 333263 | 351116 | Common horse chestnut | PRF | Tree with four potential roost features. Two were ruled out due to lack of cavity depth.<br>Bat boxes are present on this tree and will need to be checked before felling or pruning works. Also, a branch cavity too high to be fully inspected from the ground. | PRF-I |
| T003 | 333260 | 351098 | Wild cherry | FAR | Dead mature tree with no PRFs. | N/A |
| T006 | 333172 | 351109 | Pedunculate oak | FAR | Mature Oak with dense ivy cover and epicormic growth. Ivy is mature enough to act as feature but also hiding other potential features within trunk. | PRF-I |
| T008 | 333193 | 351034 | Sycamore | FAR | Mature tree with no leading branch. All branches small, offering no PRF. | N/A |
| T012 | 333202 | 351033 | Common ash | FAR | Tree with two potential roost features; however, one ruled out as cavity fully inspected by borescope and no evidence of bat use found.<br><br>One old branch break and associated callus roll has created cavity too high to inspect from ground. This will need to be checked before felling or pruning works. | PRF-I |
| T013 | 333203 | 351025 | Sycamore | FAR | Ivy cover present, that could be hiding PRFs within trunk. | PRF-I |
| T014 | 333201 | 351016 | Silver birch | PRF | Tree with two potential roost features. Both features created from dimple in trunk structure. Cavities can be seen from ground but depth unknown. | PRF-I |
| T018 | 333220 | 350973 | Silver birch | PRF | Tree with six potential roost features in the form of branch cavities spread around the tree, to be investigated before felling/pruning works. | PRF-I |
| T019 | 333232 | 350956 | Wild cherry | FAR | Small branch cavity too high to be fully inspected from the ground. | PRF-I |
| T021 | 333242 | 351003 | Sycamore | FAR | Ivy present but too sparse to provide PRF or hide PRFs within trunk. | Negligible |
| T022 | 333247 | 351005 | Sycamore | FAR | Tree in good condition with no PRFs. | N/A |
| T025 | 333198 | 351023 | European rowan | FAR | Dense ivy cover which is mature enough to act as feature but also hiding other potential features within trunk. | PRF-I |

| | | | | | | |
|---|---|---|---|---|---|---|
| T026 | 333200 | 351010 | Common horse chestnut | None | Tree in good condition with no PRFs. | N/A |
| T027 | 333207 | 351003 | Common ash | None | Immature tree in good condition with no PRFs. | N/A |
| T028 | 333242 | 350960 | Wild cherry | FAR | Immature tree with limb damage and associated callus roll creating potential roost feature to be investigated before felling/pruning works. | PRF-I |
| T029 | 333183 | 351030 | Silver birch | FAR | Two potential roost features in immature tree. Both features within trunk, one an old wound creating hole with cavity extending past callus roll into trunk and one branch break and depth cannot be seen from the ground. | PRF-I |
| T030 | 333174 | 351026 | European rowan | None | Immature tree in good condition with no PRFs. | N/A |
| T031 | 333254 | 351141 | Common lime | FAR | Two potential roost features, both ruled out due to cavity too shallow and filled with water and well-sealed gap where two branches have unified. | Negligible |
| T032 | 333255 | 351108 | Common horse chestnut | PRF | Old pollarded tree with one ruled out PRF as opening is too large and upwards facing. | Negligible |
| T033 | 333275 | 351096 | Common lime | PRF | Tree in good condition with no PRFs. | N/A |
| T034 | 333147 | 351064 | Willow sp. | FAR | Old pollarded tree with new growth. Pollarded at approximately 1.5m from the ground. Cracks in trunk ruled out as PRFs due to upwards facing nature and likelihood of water ingress. | Negligible |

4.4 **Birds**

4.4.1 Historic bird nest were found within trees T012, T026 and T034 on Site.

4.4.2 All trees on Site do provide potential bird nesting habitat in the form of open canopy suitable for pigeons, doves and magpies. Areas of dense and scattered scrub referenced in Marches Ecology PEA (In progress) provide potential bird nesting habitat for low ground cover species, such as Wrens, Robins and Blackbirds, in particular an area of shrub to the southeast of Springfield Flats and Bramble behind the sheds at Cunliffe Centre are dense enough to provide suitable shelter to low ground cover species (Plates 22 & 23).

## 5.0 DISCUSSION AND RECOMMENDATIONS

5.1 The Site has been subject to a Preliminary Roost Assessment (PRA) on 21st November 2025, desk top study and Ground Level Tree Assessment (GLTA) overseen by Mick Smith (NRW bat licence number: S095544/1).

5.2 Five buildings are located on Site; Springfield Flats, Cunliffe Centre, two garage blocks and a substation. All buildings are in good structural condition and relatively well-sealed with few PRFs. Springfield Flats possesses the most PRFs within holes in brickwork, soffit boxes and under fascia boards. No evidence of bat use was found on any building.

5.3 After the Visual Assessment, the Cunliffe Centre, two garage blocks and the substation were classified as having **negligible potential for roosting bats.**

5.4 Springfield Flats was categorised as having **low potential for roosting bats**. This means that the building could be used by bats opportunistically, but potential roost features do not provide enough space, shelter or appropriate conditions to be used on a regular basis or by a large number of bats (Collins, 2023).

5.5 Eleven trees on Site possess PRFs and will require further investigation before any felling/pruning works can take place.

5.6 The Site is immediately dominated by areas of residential and commercial development with associated infrastructure, sporadic green spaces and play areas. Beyond this, the wider landscape incorporates expanses of urban infrastructure, interspersed with areas of woodland and farmland. This immediate habitat surrounding the site is considered to be of low foraging value to bats. The

habitat in the wider landscape is considered to be of low-moderate foraging potential value for bats.

5.7 No evidence of nesting birds was recorded using the buildings, but some evidence of historic nesting was found within trees across Site. All trees and scrub on Site provides potential nesting habitat for birds and the flat roof of the Cunliffe Centre has potential for nesting gulls.

5.8 The proposed demolition and site development works will destroy access points and potential roost locations for bats and nesting birds. The proposed development is taking place on areas of already developed land; therefore, no habitat fragmentation is likely to occur within the proposed development plan and no impact on local bat foraging and commuting opportunities will take place.

5.9 **Recommendations**

*Bats*

5.9.1 Bats were not found to be roosting within the property following the visual assessment; however, Springfield Flats has been categorised as having 'low' potential for roosting bats. As such at least one dusk emergence survey will be required on this building between May to August (inclusive) to provide confidence that bats are not present, as per the survey guidelines (Collins, 2023). Should bats be found using the building during this survey, further surveys will be required to determine how bats are using the building and what type of roosts are present.

5.9.2 If bats are found to be using the building during the nocturnal survey, a **European protected species (EPS) mitigation licence from Natural Resources Wales (NRW) may be needed** to legitimise the destruction and disturbance to the roosts. This will mean the risk of direct and indirect impacts on bats will be reduced to minimal levels.

5.9.3 The Cunliffe Centre, two garage blocks and substation were categorised as having 'negligible' potential for roosting bats, therefore, no further surveys are required for these building in relation to bats. If no work is carried out on these buildings for 48 months following the date of this Report, then these building should be resurveyed to assess if their potential for roosting bats has changed in that time.

*Trees*

5.9.4 Eleven trees have been categorised as having at least one Potential Roost Feature (PRF) that requires further investigation should these trees require felling or pruning within the proposed works or they are in close proximity that the works could affect them. The development plan

provided at the time of this Report states that trees T3, T21, T26, T28 and T32 are due to be felled as part of the proposed works.

5.9.5 Any works to trees with identified PRFs (T1 – T2, T6, T12 – T14, T18 – T19, T25, T28 – T29) should be undertaken under a Precautionary Work Method Statement (PWMS). This is non-licensable approach which assumes low bat potential and no evidence of bat use. The PWMS will include, but not be limited to:

- Toolbox talk by licensed ecologist will be undertaken prior to any works commencing.
- A detailed PRF inspection survey, or Aerial Tree Inspection (ATI), to assess their suitability for bats and to confirm the absence of roosting bats should be conducted prior to felling.
- If no evidence of bats is found during the ATI, works to trees should follow a 'Soft Felling' approach. A licensed ecologist or Accredited Agent will provide a watching brief during the works.

5.9.6 Aerial Tree Inspections may involve tree-climbing and/or ladders, depending on the tree's location, PRF height and ground access. The ATI surveys can take place at any time of year, prior to felling works.

5.9.7 If bats or evidence of a roost are identified during the ATI, all works must cease immediately, and advice should be sought from a licensed bat ecologist. **A European Protected Species (EPS) licence, issued by Natural Resources Wales (NRW), may be required before any further works can proceed**. No works affecting the roost may legally continue without this licence in place.

5.9.8 Providing no bat(s)/evidence of use by bats is found within trees with identified PRFs, a European Protected Species licence will not be required for felling works. The felling works can then be carried out at any time of year without further input from an ecologist in relation to bats.

5.9.9 If no bat(s)/evidence of use by bats is found within the trees, but any PRFs remain suitable for hosting roosting bats in the future, the PRFs can be blocked/infilled to prevent subsequent bat access before felling works are due to take place. A subsequent PRF inspection survey, or ATI, to confirm the absence of roosting bats should be conducted immediately prior to felling.

5.9.10 A Work Exclusion Zone (WEZ) will be created around trees that are to be retained, and do not require any pruning works to facilitate the proposed development but are in close enough proximity to proposed development works where identified PRFs/bat roosts might be impacted or disturbed. This WEZ should be a minimum of 10m radius from each tree. Should demolition or construction

works be required within the 10m Work Exclusion Zone of any tree, these works will be overseen by a licensed ecologist.

5.9.11 If any bats are found during works, works must stop immediately, and the site ecologist will be contacted, and advice sought: **Wildbanks Conservation; 01691 623505.**

*Lighting*

5.9.12 The external lighting scheme of the development should be designed sympathetically to reduce the potential for impacts on light sensitive bat species. 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. No lighting scheme has been provided at this time.

5.9.13 Lighting during the construction period will not be switched on permanently throughout the night to avoid effects on foraging and commuting areas of light sensitive species such as brown long eared bats.

*Birds*

5.9.14 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, including all buildings, structures, trees, dense vegetation, 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 minimum 5m of the nest. This will provide a buffer between any works and the nest.

## 5.10 Compensation and Enhancement Recommendations

5.10.1 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. For bats, this typically involves replacement of potential or low-status roosts at a ratio of 1:1 or 2:1, depending on roost type, species, and local context.

5.10.2 The specific details of what enhancement features will be installed will be required after bat nocturnal surveys have taken place in bat activity season 2026.

*Bats*

5.10.3 Compensation measures should include installation of integrated bat boxes or bat features within the construction of the new buildings, to provide long-term protection of bat roosts. Boxes (if used) should be located at a minimum of 4m in height, in unlit, undisturbed areas, ideally within connected habitat corridors to support bat commuting and foraging.

*Birds*

5.10.4 To compensate for the loss of bird nesting habitat in the felling of trees and clearance of the Site, and to enhance the site for birds, we recommend new bird nesting opportunities be installed during development, details of which are to be agreed between the ecologist and Wrexham County Borough Council.

## 6.0 REFERENCES


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

- Marches Ecology (In Progress). *Proposed xxx, Land off Rhosddu Road, Rhosddu, Wrexham – Preliminary Ecological Appraisal.* Unpublished report on behalf of Wrexham County Borough Council.

- Natural Resources Wales (NRW) (1986). *Site Of Special Scientific Interest Citation: Wrexham Gatewen Marsh.* Countryside Council for Wales. (Available at https://naturalresources.wales/media/658684/SSSI_1065_Citation_EN00156d4.pdf)

- Stanbury, A., *et al.* (2021). *The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain*. British Birds *114*: 723-747. (Available online at https://britishbirds.co.uk/content/status-our-bird-populations)

## A1 APPENDIX – SITE PHOTOGRAPHS



**Plate 1:** The southeastern aspect of Springfield Flats.



**Plate 2:** The northwestern aspect of the building.



**Plate 3:** The southwestern aspect of the building.



**Plate 4:** Gaps under fascia board on gable end walls.



**Plate 5:** Holes around pipework into soffit box.



**Plate 6:** Holes into brickwork and wall cavity.



**Plate 7:** Broken/missing brickwork created bat access onto wall plate.



**Plate 8:** Example of roof in good condition.

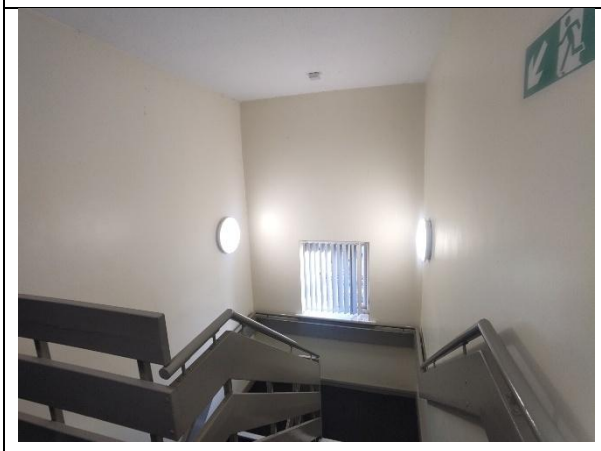


**Plate 9:** Internal aspect of building.



**Plate 10:** Loft space with lined roof and insulation.



**Plate 11:** Loft space, gable end wall structure showing expanding foam sealing wall plate.



**Plate 12:** Garage block 1 with corrugated roof.



**Plate 13:** Garage block 2 with flat roof.



**Plate 14:** Substation.



**Plate 15:** Southern aspect of the Cunliffe Centre.



**Plate 16:** Pitched section to the north of the building.



**Plate 17:** Superficial gaps in roof structure, however, timber prevents bat access into building.



**Plate 18:** Portion of missing cladding on northeastern corner of building.



**Plate 19:** Hole in brickwork used by spiders.



**Plate 20:** Crack in brickwork created by tree sapling growing on the roof.



**Plate 21:** Internal aspect of Cunliffe Centre.

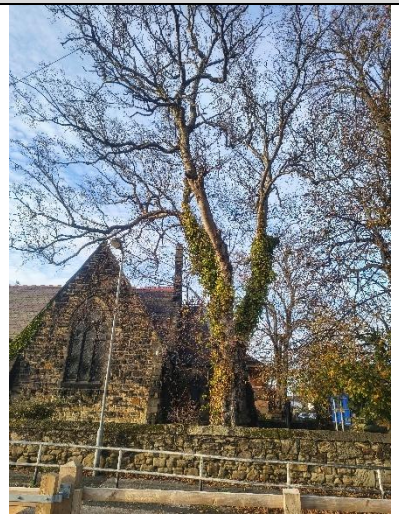
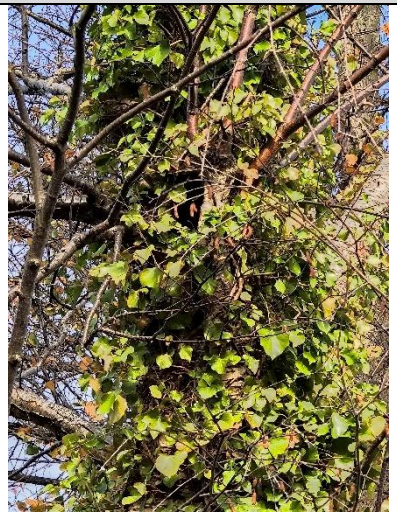
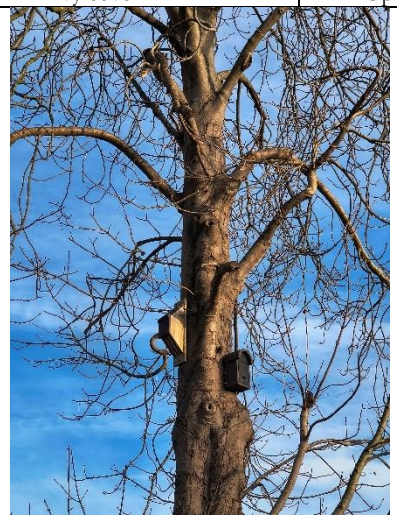


**Plate 22:** Shrub vegetation located within boundary of Springfield Flats.



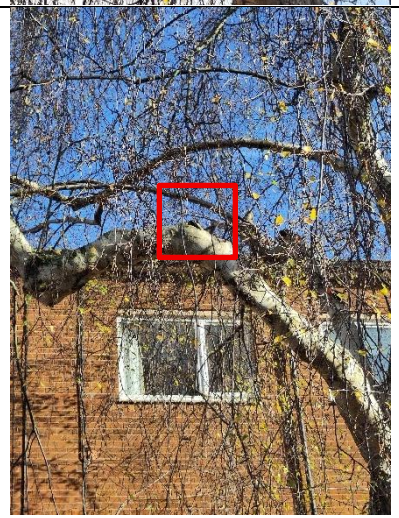
**Plate 23:** Bramble vegetation located behind sheds within boundary of Cunliffe Centre.

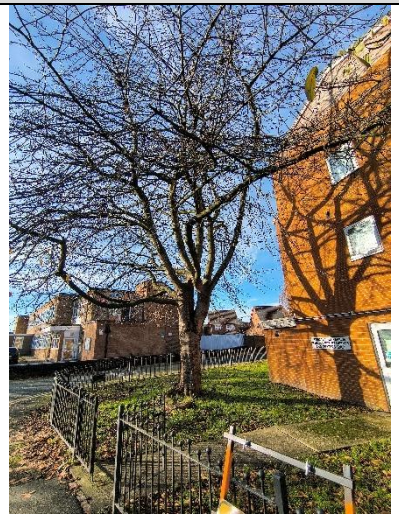
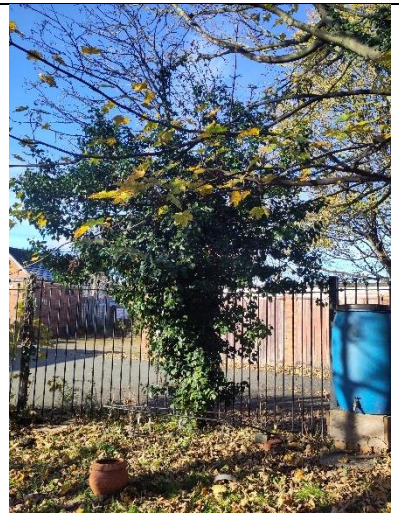
## A2 APPENDIX – TREE PHOTOGRAPHS

| Tree Number | Photograph | Potential Roost Features | | |
|---|---|---|---|---|
| T001 Silver Birch |  |  Ivy cover |  Upwards facing branch cavity |  Branch cavity with peeling bark |
| T002 Common horse chestnut |  |  Bat boxes |  Branch cavity | |

| Tree Number | Photograph | Potential Roost Features |
|---|---|---|
| T006 Pedunculate oak |  | Ivy cover visible in photo left |
| T012 Common ash |  |  Old branch break and associated callus roll creating cavity |

| Tree Number | Photograph | Potential Roost Features |
|---|---|---|
| T013 Sycamore |  | Ivy cover visible in photo left |
| T014 Silver birch |  |   Dimple in trunk structure creating cavities |

| Tree Number | Photograph | Potential Roost Features | | |
|---|---|---|---|---|
| T018<br>Silver birch |  |  |  |  |
| | |  |  |  |

| Tree Number | Photograph | Potential Roost Features |
|---|---|---|
| T019<br>Wild cherry |  | <br>Branch cavity |
| T025<br>European rowan |  | Ivy cover visible in photo left |

| Tree Number | Photograph | Potential Roost Features | |
|---|---|---|---|
| T028<br>Wild cherry |  | <br>Limb damage and associated callus roll | |
| T029<br>Silver birch |  | <br>Trunk cavity with associated callus roll | <br>Leading limb break with dead wood |

## A3 APPENDIX – LEGISLATION AND PLANNING POLICY

### Bats

A3.1 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 2017, 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); Environment (Wales) Act 2016 and the Environmental Protection Act (EPA) 1990.

A3.2 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).

A3.3 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).

A3.4 All UK bat species are referred to as European Protected Species (EPS) under the Conservation of Habitats and Species Regulations 2017.

A3.5 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 2017, 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.

A3.6 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)".

A3.7 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.

A3.8 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**

A3.9 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.

A3.10 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.

A3.11 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.

A3.12 Section 7 of the Environment (Wales) Act 2016 provides the government obligation to list habitats and species of principal importance for the purpose of conserving, or enhancing, biodiversity. This list includes bird species where conservation and nature recovery planning and action should be directed.

A3.13 The Birds of Conservation Concern (BoCC5) (Stanbury et al., 2021) is also taken into consideration when undertaking this appraisal.