Ben Jones ECOLOGY

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The report should be read in its entirety. Questions arising from the survey report should be directed to the author of the report who will be pleased to clarify any technical issues raised.

Whilst surveyors make every reasonable effort, Ben Jones Ecology Ltd cannot guarantee that all protected species have been identified and survey results are definitive. Many species are cryptic and transitional in habit.

Reports are considered valid for two years for planning purposes, after which time further survey information may be required.

Ben Jones Ecology Ltd can provide advice and support for recommendations and planning conditions.

The use of this report or survey data for any form of formal submission to an NGO or other authority implicitly implies acceptance of the terms and conditions.

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1 Executive Summary

1.1 Purpose of the Report

Ben Jones Ecology was commissioned by Sean Caddick Architectural to conduct a roost assessment of Acton Gate Audio, Wrexham, to provide supporting information for the planning application to convert the upper floor of the building to residential.

The survey report has these principal aims:

- To provide an initial assessment of the ecological value of the site in local context.
- To identify potential ecological constraints relating to the development, and recommend measures to avoid, reduce or manage negative effects, and to provide a net ecological gain.

1.2 Methodology

The appraisal included a desktop study for nearby designated sites and previously recorded protected species, and a site visit undertaken at the site, OS grid reference SJ33244988 on 19th May 2026 by Ben Jones.

1.3 Key Impacts and Mitigation Measures

The desktop study included a search for commercially available records. It was considered that the site could provide potential habitat for bat and bird species, and these should be the focus of the ecological appraisal.

The building is a red brick and render construction open to the roof on the upper floors. The roof is slate tiles which are well-set, and the roof is lined with modern breathable membrane which has suffered rodent damage in some places at the northeastern end.

The verge caps on the northeastern end have come slightly free but this is recent and is due to be repaired soon.

No evidence of bats or roof-nesting birds was found in any part of the building, and no potential access points were identified that might permit access for either species group.

No further surveys are required, and work can commence without a licence. Given the urban and illuminated nature of the site and surrounds there is limited benefit to providing roost boxes for bats as part of this development. They could be installed but likelihood of occupation is very low so are not recommended.

1.4 Conclusion

There are no ecological constraints to the development as currently proposed.

2 Introduction

This report has been compiled by Ben Jones BSc (hons) MSc who has over 10 years' experience conducting ecological appraisals.

For full details of surveyors and licences please see Appendix A.

2.1 Project Background

Ben Jones Ecology was commissioned by Sean Caddick Architectural to conduct a survey to determine the presence of protected species and potential for the damage or destruction of habitats of value. This forms part of the site assessment required to convert the upper floor of the building to residential.

2.2 Purpose of the Report

This report aims to:

- Identify the key ecological constraints to the proposed development relating to priority habitats and species and protected species (HMSO, 1981).
- Inform planning to allow significant ecological effects to be minimised or avoided where possible.
- Allow any necessary mitigation or compensation measures to be developed following the mitigation hierarchy.
- Identify the opportunities offered by a project to deliver ecological enhancement (Ministry of Housing, Communities and Local Government, 2021).
- Provide information to assist landowners with avoiding committing legal offences in relation to wildlife (HMSO, 2000)

2.3 Site Context and Location

The site is within the centre of Wrexham, OS grid reference SJ33244988. It is set in an urban environment surrounded by the rest of the town on all sides, albeit with green space immediately west of the plot boundary by way of Bellevue Park.

3 Methodology & Constraints

Broad methodologies for data collection and interpretation were informed by PEA guidance (CIEEM, 2017). Full details can be found in Appendix B.

3.1 Desk Study

The desk study provides contextual information such as the site's proximity to designated areas. Previously recorded species in the vicinity are obtained from local records centres (NBN, 2026) as this was proportionate to the size of the development.

3.2 Field Survey

3.2.1 Date and Survey Conditions

Table 3.1. Survey conditions

Date	Time	Equipment Used	Weather
19/05/2026	10:00	Camera, strong torch, DJI mini 4 pro drone	Overcast, dry
Comments	One surveyor used. Constraints: None All undated photographs in this document were taken on this date by the author unless otherwise stated.		

3.2.2 Habitats

The habitats on site were assessed for their potential to support protected species and therefore assist in the determination of site value.

3.3 Species Survey

3.3.1 Bats

An assessment of the suitability of site to support roosting bats was conducted following best practice guidance looking for evidence of roosting or potential access points (Collins, J. BCT, 2023). There were no constraints to this methodology.

3.3.2 Birds

An assessment of the suitability of site and its surrounds to support nesting birds was conducted, looking for current/old nests and listening for bird calls. There were no constraints to this methodology.

3.3.3 Other Species

An assessment of the suitability of site and its surrounds to support non-bat mammals and other species groups such as reptiles, amphibians and invertebrates was scoped out at the desktop stage.

4 Baseline Ecological Conditions

4.1 Nearby Features of Importance

The map from Natural England presented in Figure 4.1 indicates that the site is not within 1km of any statutory designed sites.



Figure 4.1. Identifying any designated areas near site, a 1km buffer is shown

4.2 Habitats on Site

The site comprises a semi-detached building at the northern end of a run. There is a busy road into town immediately east of site and carpark to the north and garden to the west.



Figure 4.2. Site (centred) overview from drone



Figure 4.3. Ground level view from northeast

4.3 Bats

4.3.1 Records

Commercially available records of bats within 2km on the NBN Atlas include common pipistrelle (*Pipistrellus pipistrellus*) and brown long-eared bats (*Plecotus auritus*). All records are scattered throughout the vicinity with no identifiable clusters, though records are provided with a poor grid accuracy so specific locations cannot be determined.

Records were provided to NBN Atlas via NRW North Wales Bat Roosts under OGL licence and The Atlas of Mammals under CC-BY licence.

4.3.2 Field Observations

No evidence of bats was seen in any part of the site, and no opportunities for roosting bats was seen from a thorough external investigation in person and by drone. The roof is well-

sealed with no missing, damaged or raised face tiles. The verge cap on the gable end is slightly raised at one point but this is recent damage and is due to be repaired imminently.



Figure 4.4. Well-set tiles



Figure 4.5. Raised verge cap, but mostly sealed

The upper floor has vaulted ceilings which meant an assessment was simple on the interior. The ceiling had damage meaning the membrane was visible through much of the building. No droppings were present, and the floors had clearly not been cleaned, meaning the interior assessment was robust. No droppings were present either in any cobwebs, stuck to walls or amongst the loft detritus on the floor beneath ceiling damage. It is understood rodents had gained access through the membrane and some damage was seen, but again no bat droppings were present in these areas.



Figure 4.6. Rodent damage to insulation



Figure 4.7. Materials stored for long periods of time free from droppings



Figure 4.8. Lack of fluffing or greasing on membrane



Figure 4.9. No bat droppings seen on insulation

4.4 Birds

No evidence of nesting birds was seen on the exterior or interior anywhere on site.

5 Description of Proposed Development

The current proposal is to convert the upper floor to residential, though no proposed plans have been provided at the time of writing.

6 Impacts, Enhancements and Mitigation

6.1 Nearby Features of Importance

Figure 4.1 shows that there are no statutory designated sites within 1km. No impact on any sites beyond this could reasonably be expected from a development of this scale, and so no further consideration for statutory designated sites is required.

6.2 Habitats on Site

The development as proposed will not result in the loss of any habitats of principal importance listed in Section 7 of the Environment (Wales) Act (HMSO, 2016), further consideration will therefore only be paid at a species level.

6.3 Bats

6.3.1 Impacts

As no evidence of bats was found on site and no potential access points were identified, the risk of a negative impact from internal conversion and repair to the verge caps is considered nil.

No further surveys are required and work can proceed without a licence from Natural Resources Wales.

6.3.2 Enhancements

The development and building will have large and tall enough walls to support an enhancement such as a bat box, but none are recommended. This is because of the urban nature of site, being well illuminated and on the side of a busy road. The likelihood of box occupation is low and so no enhancements are being proposed.

6.4 Birds

6.4.1 Impacts

Work at this site will not include anything that might impact nesting birds. No negative impact is expected and no timing restriction or specific mitigation is required.

6.4.2 Enhancements

It is recommended that a range of woodcrete boxes are erected around the site to provide an enhancement for passerine birds, and a selection of the following would be appropriate.

a. 26/32mm hole nest boxes (e.g. Schwegler 1b) should be installed at a minimum height of 3m in a westerly aspect facing toward the park.



Figure 6.1. Example suitable bird boxes

7 Concluding Remarks

The survey has focussed on the potential habitats or protected species to be damaged or destroyed as part of this development.

No evidence of any bats or nesting birds was found on site. Enhancement of site with bird boxes will ensure a small gain in biodiversity value as part of the proposal.

The development can proceed without the loss of habitat of significant value, and without the loss of the favourable conservation status of any protected species. As there is no evidence of protected species within and around the development site, there is no requirement to address the three tests under Regulation 55 of The Conservation of Habitats and Species (HMSO, 2019).

There are no ecological constraints to the development as currently proposed.

Appendix A – Surveyor Details

Table A.1. Details of surveyors' experience and licences held

Name	Membership of associations/ experience	Licenses
Ben Jones BSc(hons) MSc	Senior Consultant MCIEEM Ben has a degree in Marine and Freshwater biology and a Master's degree in "Managing the Environment". He has 11 years' experience conducting environmental appraisals and phase 2 surveys for bats and newts in England and Wales. As a member of the CIEEM he is bound by professional conduct.	Holder of survey licenses for bats and newts in England and Wales. <u>England:</u> Bats - 2025-86501-CL18-BAT GCN - 2025-81907-SCI-CL08 <u>Wales:</u> Bats – S095663/1 GCN – S094375/1

Appendix B – Methodology

Desk Study

Table B.1. Data sources

Organisation/Resource	Information Assessed
Freely available online species datasets (NBN Atlas)	Protected/Priority Species records (2km)
MAGIC website	International statutory designations (1km) • Special Protection areas (SPA) • Special Areas of Conservation (SAC) • RAMSAR sites National statutory designations (1km) • Sites of Special Scientific Interest (SSSI) • National Nature Reserves (NNR)

The National Biodiversity Network (NBN) Atlas was checked to identify any commercially available records of protected species that have formally been recorded in the area. This was considered proportionate to the size of the development.

A search on Multi Agency Geographic Information for the Countryside (Magic Maps) determined nearby designated areas. The map is presented in Section 4.1.

Field Survey

The level of survey is aimed to identify field signs of or habitats with the potential to support protected species and therefore assist in the determination for detailed phase 2 surveys.

Determination of Ecological Value is based on the general criteria provided by CIEEM (2017).

Table B.2. Criteria of ecological values

Ecological Value	Description and Examples
High	Habitats or features that have high importance for nature conservation, such as statutory designated nature conservation sites of international or national importance or sites maintaining viable populations of species of international or national importance (e.g., Red Data Book species; European protected species).
Medium	Sites designated at a county or district level, e.g., Local Wildlife Site (LWS), ancient woodland site, ecologically 'important' hedgerows or ecological features that are notable within the context of a region, county or district (e.g., a viable area of a Priority Habitat or a site that supports a viable population of a priority species).
Low	Sites of nature conservation value within the context of a parish or neighbourhood, low-grade common habitats, such as arable fields and improved grasslands and sites supporting common, widespread species.

Species Surveys

Bats

Features on site were assessed for potential for bat roosts, foraging and commuting.

An external assessment of all structures on site was undertaken to determine potential roost features (PRF). The potential suitability of the structures assessed was assigned a rating of None, Negligible, Low, Moderate or High in accordance with table 4.1 of Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition.

An internal assessment of all structures was undertaken by a suitably licensed surveyor for evidence of roosting bats such as droppings, feeding remains and staining.

Daytime surveys were conducted with the aid of a strong torch and a 12x55 monocular. Bat species may leave little evidence of their presence.

Evidence for the presence of bats includes:

- Holes, cracks and rot holes used as roosts, marked by streaks of urine and faeces.
- Smoothed, darkened edges where bats have rubbed and left natural body oils when entering and exiting a space.
- Faeces under a roof access point, a well-used feeding point or a resting spot.
- Feeding signs such as discarded insect wings under a feeding point.
- Lack of cobwebs around eaves, roof spaces, beams or ceilings where routes are kept clear by bats or presence of droppings in a cobweb.
- Presence of roosting or dead bats in or behind any object.

Birds

Searching for evidence of nesting birds, including barn owls, involved looking for:

- Presence of nests
- Collections of droppings and/or feathers
- Highly distinctive droppings or splats under roosting points.
- Presence of owl pellets/feathers
- Listening for bird song
- Recording bird activity

Appendix C – Policy

The following areas of policy and legislation are of relevance to ecology and provide context to the surveys conducted. Findings presented in this report are in line with the following:

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – as listed in:

- Schedule 2. European protected species of animals

The Wildlife and Countryside Act (1981) – as listed in:

- Schedule 1. Birds protected by special penalties at all times
- Schedule 5. Protected animals

Countryside and Rights of Way Act (2000)

Environment Act (2021) – Part 6 – Nature and Biodiversity

Natural Environment and Rurally Communities (NERC) Act (2006)

Planning Policy Wales 2002, updated Dec 2018
Section 6.4 – Biodiversity and Ecological Networks

The Nature Recovery Plan for Wales – Setting the course for 2020 and beyond (2015)

Environment Act (Wales) (2016)
Section 7

Bats

All bat species are protected under The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 which implements the EC Directive 92/43/EEC in the United Kingdom. It is an offence, with certain exceptions, to:

- Deliberately capture or kill any wild animal of a European Protected Species.
- Deliberately disturb any such animal.
- Damage or destroy a breeding site or resting place of such a wild animal.
- Keep (possess), transport, sell or exchange, or offer for sale or exchange, any live or dead wild animal or plant of a European Protected Species, or any part of, or anything derived from such a wild animal or plant.

A person found guilty of an offence is liable on summary conviction to imprisonment for a term not exceeding six months or to an unlimited fine or to both.

Seven bat species are on the UK Biodiversity Action Plan and are listed as Species of Principal Importance under the provisions of the Natural Environment and Rural Communities (NERC) Act 2006. The National Planning Policy Framework (NPPF) states that to minimise impacts on biodiversity and geodiversity, "*planning policies should… promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations*".

Birds

Under Section 1 of the Wildlife and Countryside Act 1981 (as amended), birds, their nests and young are all protected from damage, particularly during the breeding season. The Act allows for fines or prison sentences for every bird, egg or nest destroyed. It makes it an offence to:

- Intentionally kill, injure or take any wild bird.
- Take, damage or destroy the nest of any wild bird whilst it is in use or being built.
- Take damage or destroy the egg of any wild bird.
- To have in one's possession or control any wild bird, dead or alive or egg or any part of a wild bird or egg.

Some bird species are included in the UK and local BAPS and are recognised as species of principal importance for nature conservation in accordance with section 41 of the NERC Act 2006. Such species and their habitats receive protection through the provisions of the NPPF.

Appendix D - Bibliography

CIEEM Guidelines for Preliminary Ecological Appraisal, 2nd Edition. - Winchester : Chartered Institute of Ecology and Environmental Management, 2017.

Collins, J. BCT Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th Edition / ed. Collins J. - London : Bat Conservation Trust, 2023.

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