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Bat Mitigation Plan

Survey site:
Ruabon Brickworks, Hafod Road, Ruabon, Wrexham LL146ET

Client:
ST Demolition and Groundwork Ltd

Survey date:
28/08/2026

Project:
This report is prepared to inform Wrexham County Borough Council regarding:

Emergency Part Demolition of Dennis Ruabon Buildings Fronting Hafod Road, Ruabon

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited were commissioned by ST Demolition and Groundwork Ltd to produce a Bat Mitigation Plan (BMP) for a proposed development at Ruabon Brickworks, Hafod Road, Ruabon, Wrexham LL146ET (hereafter referred to as the site), in order for works at the site to comply with The Conservation of Habitats and Species Regulations 2017 (as amended) and maintenance of the Favourable Conservation Status (FCS) of bats within the region.

The site has been subject to the following previous ecological assessment of relevance to this report:

- A Preliminary Ecological Appraisal (PEA) and Roost Assessment (PRA) (Arbtech Consulting Ltd, 2026)
- Bat Emergence Surveys (Arbtech Consulting Ltd 2026)

1.2 Project Description

Proposals for the site comprises the demolition and clearance of the site including all buildings (B1-B5). However, this report has been produced specifically to the works to be carried out to B1 due to recent damage as a result of a fire which occurred within the building (B1) on 10th August 2026. The fire has rendered the building in an imminent state of collapse and a risk of health and safety to the public as the structures are adjacent to Hafod Road and areas of amenity grassland and woodland. Wrexham County Council have inspected the site and request the emergency demolition of B1 under Sections 77 and 78 of the Building Act 1984, relating to dangerous buildings and emergency measures. A plan showing the existing site (BERS map, 2026) is found in **Appendix 1a**, a plan showing the proposed development is provided in **Appendix 1b**.

1.3 Site Context

The site is located at National Grid Reference SJ 31129 46207 and has an area of approximately 4ha comprising five buildings, developed land; sealed surface, sparsely vegetated land, willow scrub, mixed scrub, bramble scrub and modified grassland. The site is situated ~1km east of the residential town of Johnstown, Wrexham. The town comprises of dense residential settlements with associated vegetated gardens. To the north of the site is dense woodland which connects to priority parkland, containing ponds designated for GCN, along the western boundary of the site and extending to the south. The land to the east of the site is parkland and agricultural land. A site location plan is provided in **Appendix 2.**

1.4 Planning Context of This Report

The client has commissioned this BMP to provide a detailed mitigation and compensation strategy with regards to bats at the site in accordance with bat survey data collected to date. The aim of producing this document is to provide detail to the local planning authority and Natural Resources Wales (NRW), as required to confirm that the proposals will not result in contravention of The Conservation of Habitats and Species Regulations 2017 (as amended) and that the development is also capable of maintaining of the Favourable Conservation Status (FCS) of bats within the region. The aim of producing this document is to provide detailed mitigation measures to reduce the risk of disturbance to known bat roosts in adjacent buildings during the proposed works, as well as impacts to any roosts that may be using the subject buildings transitionally.

2.0 Ecological Baseline Conditions Relevant to This Report

The baseline ecological conditions relevant to this report were determined as a result of the PEAPRA and BERS (Arbtech 2026).

2.1 Suitability of the Site to Support Roosting Bats

Following the completion of the PEAPRA in 2026, the buildings on site were found to have the following suitability for bats:

- B1 was found to have low habitat value for roosting bats.
- B2 was found to be a confirmed roost with droppings identified within the loft space above the office block located in the southernmost gable on the eastern elevation. These were confirmed to be brown long eared bat.
- B3, B4 & B5 were found to have negligible habitat value for roosting bats.

In accordance with current guidance (Collins 2023), one survey was undertaken on B1 and three surveys were undertaken on B2 by Arbtech Consulting Ltd in 2026. This concluded an absence of roosting bats within B1. During the internal inspection of both buildings a single brown long eared bat was identified within the loft void of B2 where the droppings were previously identified. It was concluded from these surveys that this is a day roost. Additionally, a day roost of common pipistrelle (max count 1) was identified on B2. This roost is located between the roof tiles and fascia board (northernmost board) on the same gable end which hosts the brown long eared day roost. A plan showing the results of the 2026 BERS is found in **Appendix 3.**

A European Protected Species Licence (EPSL) is required to legally permit the demolition of B2. This requirement exists independently of the planning system and is required whether planning permission is needed or not, and whether this is listed as a condition of planning or not.
The emergency demolition required as a result of the fire damage is restricted to B1. There is no connectivity between the loft void, identified as a brown long eared day roost, or the location of the common pipistrelle day roost in B2, and B1. However, due to the proximity of B1 to B2 and known bat roost within B2, it was concluded that the works should proceed under a bat mitigation plan (BMP), to ensure limit any risk of disturbance to the bat roosts within B2 during demolition.

In addition to the this, due to bats regularly moving between buildings for roosting, although the current survey effort has confirmed a likely-absence of bats within B1, there is a risk of bats moving into these buildings prior to works commencing, and as such this report will also aim to address this.

2.2 Impact Assessment

Proposals for the site comprises demolition and clearance of all on site buildings. However, this report has been produced specifically to the works to be carried out to B1. There will be no direct impacts to the loft void or fascia boards of B2 during the demolition of B1.

Although the surveys carried out to date have concluded a likely absence of bats within B1, due to the known presence of roosting bats (common pipistrelle and brown long eared bat) within B2 there is risk of disturbance to these roosts during B1 demolition. As such, this BMP provides a mitigation strategy on the basis of indirect impacts to common pipistrelle and brown long eared day roosts in B2, in accordance with the proposed development. It is expected that this strategy will be followed during the proposed works to B1 and that works to B2 will not commence until an EPSL is obtained from NRW to permit the works.

3.0 BMP

Mitigation, compensation, and enhancement prescriptions to maintain the favourable conservation status of bats and enhance roosting opportunities at the site in perpetuity in accordance with the proposed development are detailed in **Table 1** below.

Table 1: Mitigation Prescriptions

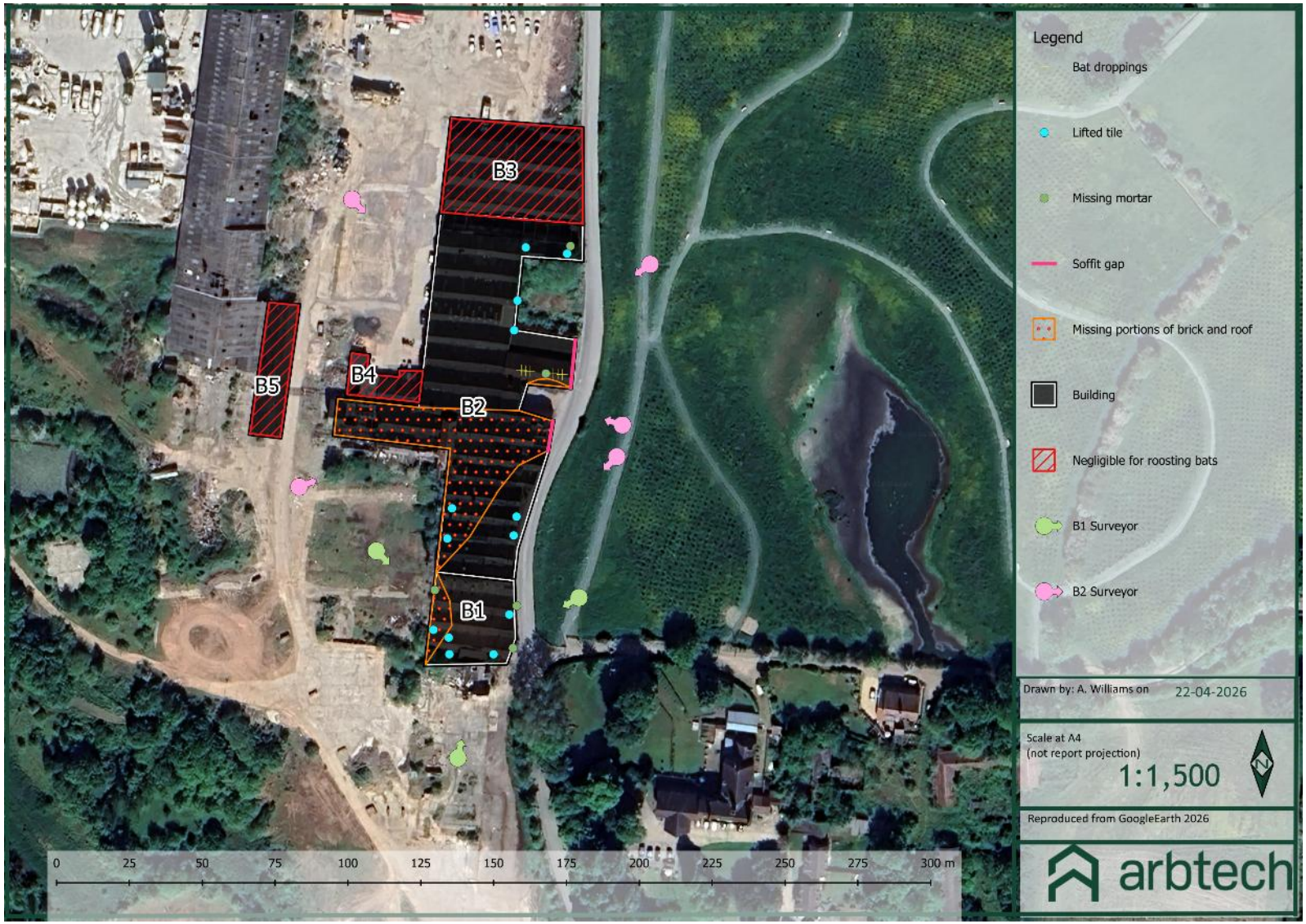
Mitigation	Specification
Further Survey Requirements	No further BERS are required to confirm the presence / absence of bats or to categorise the species and roost types present at the site. However, should development at the site be delayed and works not commence before May 2027, updated BERS should be undertaken to confirm the status of bat roosts within the site. Additionally, should a licence for the proposed works to B2 not be applied for before May 2027, additional updated surveys will be required to inform the licence application to Natural England.
Licence Requirements	An EPSL application to Natural Resources Wales will not be required for works to B1. No works are proposed to take place on the buildings containing bat roosts B2 until a licence has been obtained and as such there will be no direct impacts to roosting bats (i.e. destruction, damage or modification) as a result of B1 demolition. If during the works to B1, bats or evidence of bats is found then works will stop immediately and an EPSL application will be made to Natural Resources Wales.
Mitigation and Compensation Requirements	The following mitigation and compensation measures will be delivered as part of the BMP: <u>Timings</u> • Due to the categorisation of roosts present within B2 as day roosts only and the nature of the current proposals limited to the adjacent building (B1) there are no requirements for timing restrictions of works. Works may proceed within the bat activity period, as long as the remaining measures outlined within the BMP are adhered to. • The provision of a toolbox talk to all contractors by a Level 2 bat licenced ecologist, to inform them of the presence of bat roosts. • Daily timing restrictions should be implemented in order to reduce disturbance to roosts present within B2. Works should not be undertaken beyond sunset and cannot start before at least an hour after sunrise to avoid the daily bat activity window.

	Prior to disturbance works commencing • The demarcation of suitable working area away from the identified bat roosts including provision of a 10m noise and vibration disturbance buffer zone for the roosts within B2, limiting the use of power tools and machinery within close proximity to this roost. This buffer zone is shown in **Appendix 4** Throughout disturbance works • Avoiding the use of unnecessary lighting, particularly at night, or implementing a low impact lighting strategy to avoid illumination of retained roost features and key commuting and foraging areas throughout the construction period. Detailed in **Appendix 4**. • Avoiding excessive noise or vibration disturbance e.g. from power tools or radios, within close proximity of retained roosting features throughout construction by maintaining the suitable working area and 10m disturbance buffer zone. • All identified roosts within B2 will be retained. The location of retained roosts is detailed in **Appendix 3.**

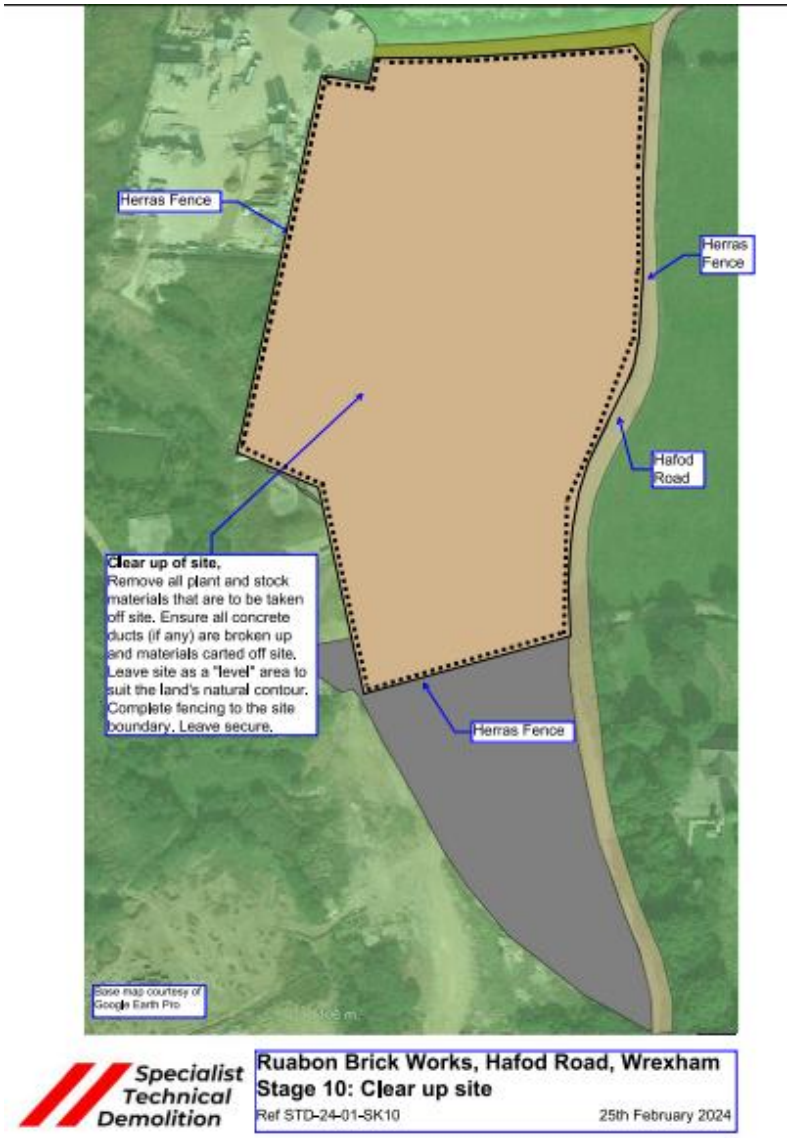
4.0 Bibliography

- Arbtech Consulting Limited. (2026). PEA+PRA_Ruabon Brickworks_LL146ET_46880004_v2
- Arbtech Consulting Limited. (2026). BERS-report-Ruabon_Brickworks-LL14_6ET-V1_0-03_08_2026
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Collins, J. (2023). Bat Surveys for Professional Ecologists —Good Practice Guidelines, 4th edition, Bat Conservation Trust, London.
- Garland, L. & Markham, S. (2008) Is Important Bat Foraging and Commuting Habitat Legally Protected? http://biodiversitybydesign.co.uk/cmsAdmin/uploads/protection-for-bat-habitat-sep-2007.pdf
- Institution of Lighting Professionals. (2023). Guidance Note 08/23: Bats and Artificial Lighting at Night. Bats and the Built Environment Series Publication: https://www.bats.org.uk/news/2023/08/bats-and-artificial-lighting-at-night-ilp-guidance-note-update-released
- National Planning Policy Framework. (2023). https://www.gov.uk/government/publications/national-planning-policy-framework--2

Appendix 1a: Existing site (PRA map)



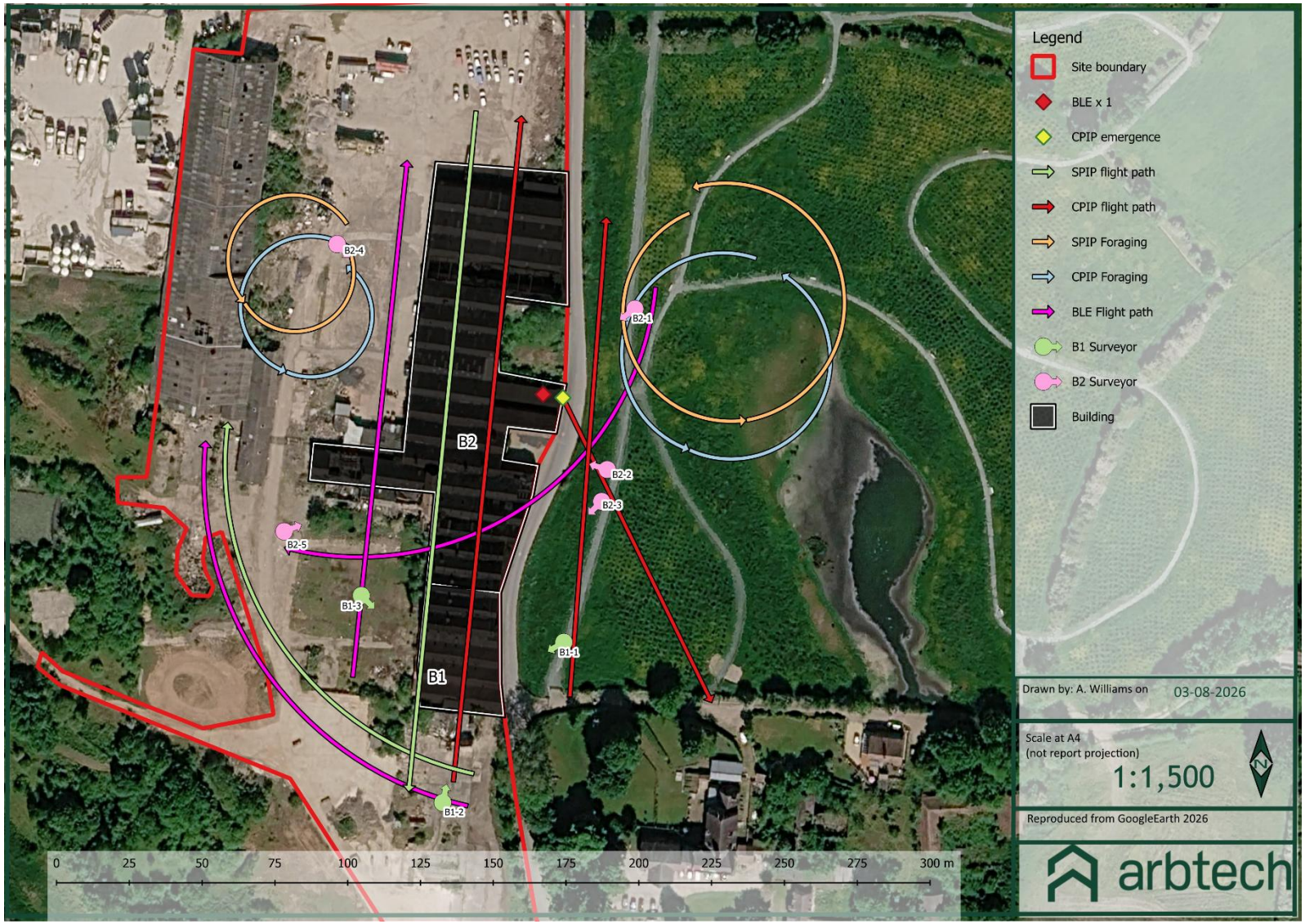
Appendix 1b: Proposed Plans



Appendix 2: Site Location Plan



Appendix 3: BERS map 2026



Appendix 4: Suitable Working Area



Appendix 5: Legislation and Planning Policy

LEGAL PROTECTION

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

Regulation 43: Protection of certain wild animals – offences

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

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

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

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

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

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

(a) To impair their ability:

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

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

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

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

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

NATIONAL PLANNING POLICY (ENGLAND)

National Planning Policy Framework 2021

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) is also listed as a requirement of planning policy.

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

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

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

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

LOCAL PLANNING POLICY

South Downs Local Plan

The document includes policies which relate to biodiversity and nature conservation which are relevant to this report. Such policies are detailed below:

Strategic Policy SD9: Biodiversity and Geodiversity

Development proposals will be permitted where they conserve and enhance biodiversity and geodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation. Prior to determination, up-to-date ecological information should be provided which demonstrates that development proposals:

a. *Retain, protect and enhance features of biodiversity and geological interest (including supporting habitat and commuting routes through the site and taking due account of any use by migratory species) and ensure appropriate and long-term management of those features;*
b. *Identify and incorporate opportunities for net gains in biodiversity;*
c. *Contribute to the restoration and enhancement of existing habitats, the creation of wildlife habitats and the creation of linkages between sites to create and enhance local and regional ecological networks;*

d. Protect and support recovery of rare, notable and priority species;
e. Seek to eradicate or control any invasive non-native species present on site;
f. Contribute to the protection, management and enhancement of biodiversity and geodiversity, for example by supporting the delivery of GI and Biodiversity Action Plan targets and enhance Biodiversity Opportunity Areas (BOA); and
g. Comply with the mitigation hierarchy as set out in national policy.

PROTECTED AND PRIORITY SPECIES

5.77 Some species have special protection under international and national legislation (such as the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017). Legally protected species which are prominent in the National Park and which could be affected by new developments include but are not restricted to all wild birds, all native species of bat, great crested newt and badger and, in rivers, water vole, brown trout, river lamprey and European eel. Where there is a reasonable likelihood that a protected species may be present and affected by a proposal, comprehensive surveys will need to be undertaken to provide the evidence needed to allow a determination to be made and licenses to be sought where necessary.

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Guidelines

This assessment has been designed to meet:

- British Standard 42020 (2013) 'Biodiversity – Code of Practice for Planning and Development'.

Proportionality

> The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.
>
> This approach is enshrined in Government planning guidance, for example, paragraph 185 of the National Planning Policy Framework for England.
>
> The desk studies and field surveys undertaken to provide a preliminary ecological appraisal (PEA) might in some cases be all that is necessary.
>
> (BS 42020, 2013)

In consequence of the scale and intensity of the proposed development, this plan-led report is considered adequate and proportionate. It communicates all relevant information necessary to determine a planning application.

Version control			
Status	**Issue**	**Name**	**Date**
Draft	0.1	Amber Williams BSc (Hons) MSc MPhil Consultant Ecologist (Accredited on Natural Resources Wales Bat Licence: Details available on request)	28/08/2026
Proof	0.2	Leo Plevin BSc (Hons), MSc MCIEEM Technical Manager (Ecology)	01/09/2026
Final	1.0	Amber Williams BSc (Hons) MSc MPhil Consultant Ecologist (Accredited on Natural Resources Wales Bat Licence: Details available on request)	01/09/2026