Leigh Ecology Ltd

Protected Species and Habitat Surveys



Regent House, Regent Street, Wrexham.

On behalf of Edward Fifield (Osborne House Ltd).

Preliminary Ecological Appraisal and Bat Roost Assessment

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Date	3rd July 2026
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Important Information to Readers

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The advice contained in this report is based on the information available and/or collected during the period of study. We cannot eliminate the possibility of important ecological features being found through further investigation and/or by survey at different times of the year or in different years.

Surveys and assessments are undertaken on the understanding that nothing in our reports will be omitted, amended or misrepresented by the client or any other interested party.

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Contents

1. Executive summary 4

2. Introduction 5

2.1 Legislation & Policy 8

3. Methodology 11

4. Results 16

5. Constraints and Recommendations 24

6. References 27

1. Executive Summary

Leigh Ecology Ltd was commissioned to undertake a Preliminary Ecological Assessment (PEA), including a Preliminary Bat Roost Assessment (PBRA), at Regent House, Wrexham.

The site comprises a large, multi-storey commercial office building, constructed predominantly of brick external walls with prominent windows. The external roof is a flat felt bitumen roof bounded by concrete edging.

The proposal comprises the change of use of the existing building to studio apartments. The ground floor is currently in commercial use and will remain so.

The building offers negligible potential for bat roosting, given its good condition and unsuitable construction.

The building is accompanied by a hard standing parking area to the rear and hard standing paving. Several mature trees are present to the front and rear of the building, which are currently exposed to intense artificial lighting. These trees will be retained.

The building is located within Wrexham city centre, surrounded by dense urban infrastructure.

During the roof inspection, a pair of Herring Gulls and a juvenile gull were present on the roof, indicating that the building is being used as a breeding site by Herring Gulls.

2. Introduction

Background

Leigh Ecology Ltd was commissioned by Edward Fifield to undertake a Preliminary Ecological Assessment (PEA), including a Preliminary Bat Roost Assessment (PBRA), of a disused office building and its associated land known as Regent House, Wrexham. The site is located at approximate National Grid Reference (NGR) SJ331505, with the site boundary *shown in red on Figure 2.1 below.*



Figure 1; Building Location and Site Extent.

(Google Satellite, 2026).
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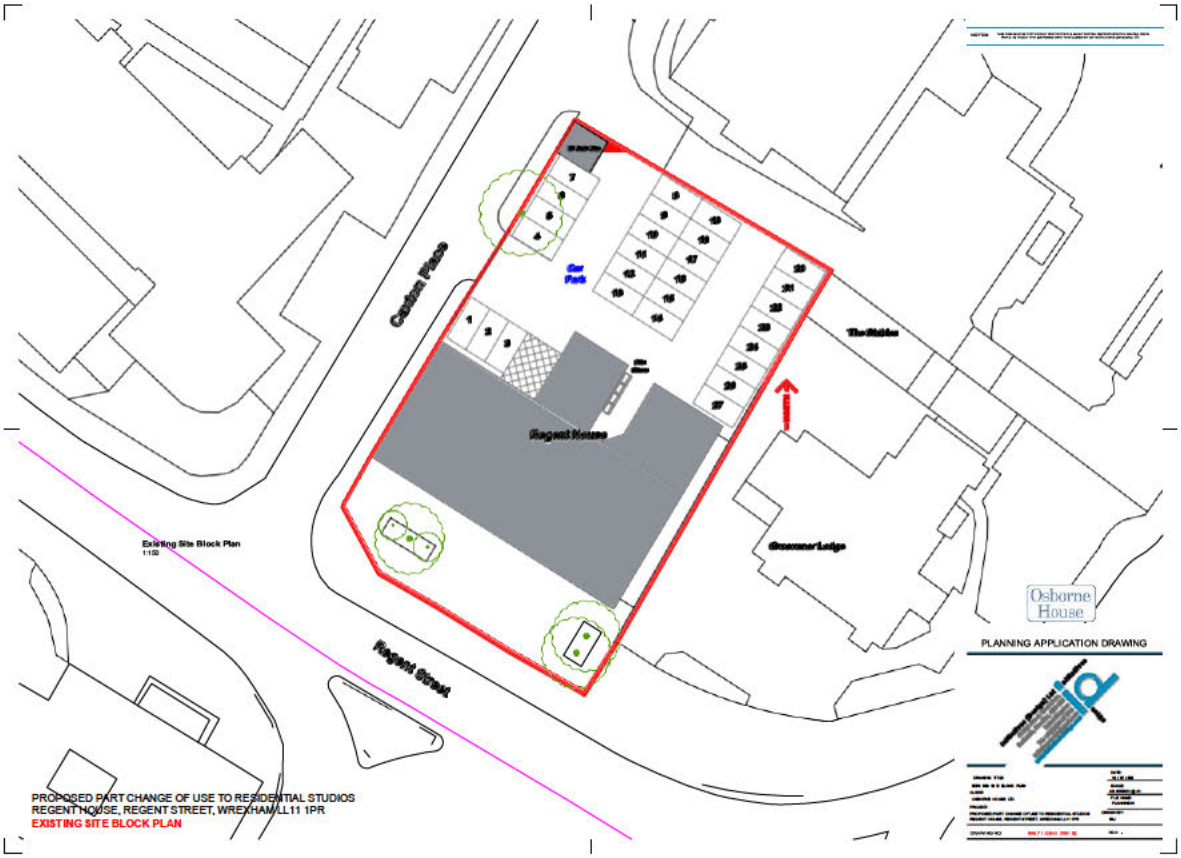


Figure 2; Existing Site plan.

(Initiatives Design, 2026).
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This report presents baseline ecological information derived from the diurnal appraisal survey. It also provides recommendations for any additional surveys or works required to deliver a comprehensive ecological impact assessment.

The Applicant should be aware that if, during the appraisal:

- The site is found to be suitable habitat for any European Protected Species (EPS), other protected species, or priority habitats/species, or
- Evidence of use by protected species is observed or suspected, or
- Seasonal constraints limit the ability to gather sufficient ecological data for a robust assessment,

then further detailed surveys may be recommended to enable a conclusive assessment of potential ecological impacts.

If protected species are subsequently confirmed during these additional surveys and may be affected by the development, it is likely that a European Protected Species Licence (EPSL) will be required to proceed with development works.

2.1 Legislation & Policy

This report considers the following key legislation and policy relevant to ecological assessment and protection:

Legislative Context (Wales)

Wildlife and habitats recorded or considered during this assessment are protected under a combination of UK and Wales-specific environmental legislation and policy frameworks.

The Wildlife and Countryside Act 1981 (as amended) provides primary legal protection for many species and habitats in Wales. Under this Act, it is an offence to intentionally kill, injure, or take protected species, or to damage or destroy certain protected plants and animals. Schedule 1 species, including birds such as Barn Owl (*Tyto alba*), receive additional protection against disturbance while nesting. Schedule 5 protects a range of animals including reptiles and some mammals, while Schedule 8 protects certain plant species. The Act also regulates invasive non-native species (INNS) listed under Schedule 9, making it illegal to plant or otherwise cause these species to grow in the wild.

European Protected Species (EPS), including all bat species and Great Crested Newt (*Triturus cristatus*), are protected under the Conservation of Habitats and Species Regulations 2017 (as amended following EU Exit). These regulations make it an offence to deliberately capture, kill, injure, or disturb these species, or damage or destroy their breeding sites or resting places. Where development may affect EPS, a licence from Natural Resources Wales (NRW) may be required before works can proceed.

[redacted]

In Wales, biodiversity conservation is further supported through the Environment (Wales) Act 2016. Section 6 of the Act places a duty on public authorities to maintain and enhance biodiversity in the exercise of their functions. Section 7 lists Species and Habitats of Principal Importance for the conservation of biodiversity in Wales, which are key considerations in ecological assessments and planning decisions.

Planning policy in Wales, particularly Planning Policy Wales (PPW) and Technical Advice Note (TAN) 5: Nature Conservation and Planning, requires that development proposals consider potential impacts on protected species and priority habitats. The presence of such species is considered a material planning consideration, and appropriate mitigation or compensation measures may be required where impacts are identified.

Scope of Study

This report includes:

- A preliminary ecological baseline assessment for the site
- An assessment of protected mammals on site
- A review of MAGIC was undertaken
- Identification of potential ecological constraints to development
- Recommendations for any further ecological work required to support a planning application.

All work was conducted in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct and Good Practice Guidelines.

This legislation is of relevance to protected species identified as having potential to occur within the site, including bats, breeding birds and amphibians.

3. Methodology

A daytime Preliminary Ecological Appraisal (PEA) was conducted on the 22nd of June 2026 in dry and sunny conditions. The survey was undertaken by Roy Leigh (NRW Bat Surveyor; licence no. 5091926-1) and Ecologist Christian Leigh.

Floristic Assessment

The survey employed the UK Habitat Classification Version 1.1 (Butcher et al., 2020), aligning with the Biodiversity Net Gain framework, and referred to the Joint Nature Conservation Committee (JNCC) Phase 1 Habitat Survey methodology (JNCC, 2010). The approach also followed guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Preliminary Ecological Appraisal, 2nd Edition (CIEEM, 2017).

During the walkover, botanical assemblages were recorded, with particular attention given to red-listed species (Stroh et al., 2014), species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, and legally protected plant species listed under Schedule 8 of the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). Species nomenclature follows Stace (2019) for vascular plants, Smith (2004) for mosses, and Dobson (2018) for lichens.

The site was also assessed for invasive non-native species (INNS), as listed under Schedule 9 (Part II) of the Wildlife and Countryside Act (1981, as amended).

Faunal Assessment

Fauna presence and evidence were documented alongside an assessment of the site's suitability for priority species. The walkover also included searching for ephemeral pools or unmapped waterbodies that could be ecologically significant.

Bats

The site was surveyed for bats, including inspection of buildings (where present) for potential roosting features (PRFs) and signs of use such as droppings, incidental sightings, or prey remains. The inspection utilised a high-powered torch to examine internal and external features, including roofs, eaves, and crevices.

External building inspection

The objective of the survey was to locate any signs of bat activity, for example:

- Bat droppings
- Feeding remains
- Grease staining/ urine marks
- Corpses or skeletons
- Potential access points to internal roosts.

The bat signs listed above are visible from the outside of the building. The following areas were searched using binoculars:

- Ground floor casing
- Any cracks/ holes in the panels
- Between wall panels and framework
- On external panelling, and ridge.

Internal building Inspection

Bats regularly utilise specific areas within roof spaces/open roof configurations (see below), which were searched as a priority for any bat field signs:

- Beneath hip joints and junctions

- Staining above/ around gaps
- Within cobwebs
- Staining around tile gaps
- In cavities of walls within the roof wall joints
- On floor under specific beams and joints
- Wall joints.

Any signs of bird usage including any current live or old nests, droppings, pellets etc. were noted during the bat survey.

All trees (if present) were also assessed for bat roost potential using close-focus binoculars and torches. Potential roost features include woodpecker holes, rot holes, cracks or splits, lifted bark, knot holes, cavities, ivy cover on stems >50mm diameter, and bat or bird boxes.

The assessment criteria followed the Bat Conservation Trust's Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th Edition (2023).

Landscape Assessment for Bats

Linear features such as hedgerows and watercourses, which often serve as bat commuting and foraging routes, were identified and evaluated for potential impacts from development activities.

Breeding Birds

The survey checked buildings, trees, hedgerows, and scrub for nesting birds and nesting suitability. Bird species observed and heard were recorded, along with searches for nests or nesting materials. Special attention was given to species

protected under Schedule 1 of the Wildlife and Countryside Act (1981, as amended), including priority species such as Barn Owl (*Tyto alba*).

Other Mammals

The walkover included a search for signs of [redacted], [redacted] [redacted] Evidence or habitat suitability for European Hedgehog (*Erinaceus europaeus*) was also recorded.

Amphibians and Reptiles

A 250m radius desktop search from the site's central grid reference identified nearby ponds, ditches, or waterbodies potentially supporting Great Crested Newts (GCN). This informed recommendations for any further detailed surveys.

The site was evaluated for reptile suitability by examining features such as south-facing slopes (basking), hibernation sites (e.g., banks, walls, rubble piles), and foraging habitat (e.g., rough grassland and scrub).

Professional Judgement & Constraints

The conclusions and recommendations presented within this report are based on the surveyor's professional judgement, informed by their experience, qualifications, and knowledge of the site's ecological features within the local and regional context.

The survey was undertaken in April, which falls outside the optimal survey period for botanical species, reptiles, and amphibians. Whilst habitats were readily identifiable and could be assessed with confidence based on their structure, composition, and management, it is acknowledged that species diversity may be under-represented at this time of year. Consequently, where appropriate, a precautionary approach has

been adopted when assessing habitat value and the potential for protected and notable species to be present.

Notwithstanding these seasonal constraints, the survey is considered sufficient to identify the principal ecological features of the site and to inform an assessment of the likely ecological effects of the proposed development.

4. Results

Site Survey

Habitats within the survey area

The results of the Phase 1 Habitat survey are detailed in Appendix 1, with supporting photographs integrated within the text. Habitat descriptions are provided using English plant names for clarity.

Site Overview

The survey area encompasses the entire extent of land shown in Figures 1 and 2. The proposed development comprises the renovation and change of use of the existing building.

The building is in consistently good condition, with no evidence of notable damage to the exterior. The external roof is well sealed, with concrete edging and joints all in good condition. The building is surrounded by intense artificial lighting, given its city centre location.

The building comprises standard brick external walls, which are in good condition throughout. The exterior features prominent windows on every storey, reflecting its previous use as office accommodation. The external ventilation systems offered no suitability for bat PRFs.

The surrounding site comprises hard standing, with several mature trees to the front of the building and a larger mature tree to the rear. Four silver birch trees are present at the front of the building, adjoining the hard standing footpaths. A mature lime tree is also present within the rear car parking area.

Habitats

The principal ecological feature within the site is the existing building, which was assessed for its potential to support roosting bats through both external and internal inspections. The building exhibits negligible suitability to support roosting bats, given its good condition, unsuitable construction and location within a dense urban environment.

The flat roof provides suitable habitat for gull breeding and roosting, with a pair of Herring Gulls and a juvenile gull recorded on the roof during the survey. Sheltered flat roof buildings can provide suitable nesting habitat for breeding gulls.

Site Boundaries

The site does not feature any significant physical boundaries separating it from the surrounding urban environment, other than a brick wall along the eastern boundary.

Surrounding Habitats

The site is located within Wrexham city centre, surrounded by a dense urban environment comprising typical urban infrastructure, including roads, buildings and artificial lighting.

The nearest designated site is Gatewen Marsh SSSI, located approximately 1,080m northwest of the site. Sontley Marsh SSSI is located approximately 2,367m southwest of the site.



Photograph 1; A rear view of Regent House. The good condition and construction of the building can clearly be seen.



Photograph 2; A view of the western elevation of the building, demonstrating its well-maintained external condition.



Photograph 3; A view of the front elevation of the building and one of the silver birch trees present.



Photograph 4; A view of the roof of the building, showing the felt bitumen roof covering with concrete edging.



Photograph 5; Another view from the roof of Regent House. A pair of Herring Gulls and a juvenile gull were recorded on the roof, indicating that it is used as a breeding site.



Photograph 6; A view of the lime tree to the rear of the building, set within an existing hard standing parking area.

Protected and notable species

Invertebrates

The site comprises a building with associated hard standing and therefore offers no suitable habitat for notable invertebrate species.

Amphibians

Great crested newts (GCN) are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). This legislation provides protection to individual newts, as well as the habitats they use for shelter, resting and breeding.

The site is located within Wrexham city centre, adjacent to busy roads and typical urban infrastructure. No suitable habitat for GCN was identified within the site and this species is therefore not considered a constraint to the proposed development.

Bats

Surrounding Habitat and Tree Inspection

The site offers very limited habitat to support roosting and foraging bats. Four silver birch trees are present at the front of the site, alongside the pathway running parallel with Regent Street. A larger lime tree is also present within the rear hard standing parking area. These trees will be retained and are currently exposed to intense artificial lighting.

Buildings on site

The building on site is a four-storey office block comprising typical brick external walls with a flat felt bitumen roof bounded by concrete edging. The building features large windows on each floor and is in good condition, having been well maintained over

time. No PRFs were identified during the external inspection, with the walls and roof structure appearing well sealed throughout.

No evidence of bat use was identified during the internal inspection. The top floor featured suspended ceilings, as commonly found within office buildings. No evidence of bat use was identified when the roof was also inspected.

The building was therefore categorised as offering negligible bat roost potential.
The proposed development comprises the change of use of the existing building.

Breeding Birds

The building features a flat roof, which provides suitable nesting habitat for gull species. A pair of Herring Gulls and a juvenile gull were recorded on the roof during the survey. Given the age of the juvenile gull, the roof should be treated as an active breeding site.

The building will undergo solar panel installation to the roof, likely affecting the existing suitability for gull nesting. Beyond this, the building offers unsuitable nesting habitat for most bird species.

The mature trees on site provide suitable nesting habitat for birds, although no active nests were identified during the survey.

[redacted]

[redacted]

[redacted]

Other Mammals

The site offers negligible suitability for other mammal species due to the absence of suitable habitat.

5. Constraints and Recommendations

The proposed development plans include the change of use of the building.

Positioning, construction and post construction impacts are therefore likely upon both the habitats and species within and immediately adjacent to the site. Ecological constraints and recommendations regarding any development of the site are discussed below.

Non-native invasive species

Invasive Plants

No invasive species of concern were identified on site during the site visit.

Protected Species

The site contains a single, four storey former office building that is proposed to undergo renovation and conversion. As the proposed works will affect both the interior and exterior of the building, any roosting bats present could be directly impacted by the development.

The building was assessed as offering negligible suitability for roosting bats due to its unsuitable construction, good condition and location within a dense urban environment. Consequently, no further bat surveys are considered necessary in support of the proposed development.

Bats

No further bat surveys are considered necessary in support of the proposed development.

Birds

To comply with the Wildlife and Countryside Act 1981 (as amended), development works should ideally be undertaken outside of the bird nesting season to avoid impacts to breeding birds.

If works are required during the nesting season, a pre commencement nesting bird check should be undertaken by a suitably qualified ecologist. This should include any vegetation to be removed, together with suitable nesting features on the building, including ledges and other external features that could support nesting birds.

Where an active nest is identified, works in the vicinity must cease and an appropriate buffer maintained until the nest is no longer active and all young have fledged.

The building will undergo solar panel installation to the roof, likely affecting the existing suitability for gull nesting. Beyond this, the building offers unsuitable nesting habitat for most bird species. Breeding Herring Gulls were recorded on the external roof. Therefore, any proposed development works with the potential to disturb nesting birds should be undertaken outside of the bird nesting season. Appropriate mitigation and enhancement measures should also be incorporated into the roof design to safeguard nesting birds and where appropriate, maintain or enhance opportunities for future nesting and breeding.

Amphibians

No suitable habitat for amphibians was identified within the site, and no ponds were identified in close proximity. Amphibians are therefore not considered a constraint to the proposed development.

Reptiles

No reptiles were observed during the survey. The site offers low suitability for common reptile species and reptiles are not considered a constraint to the proposed development.

[redacted]

Other Mammals

No evidence of other mammal species was identified during the survey. Other mammals are not considered a constraint to the proposed development.

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