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Dusk Survey Results

September 2026

Project Reference: PR-26-0163

Haddon Bank
Erbistock
Wrexham
LL13 0DW

National Grid Reference: SJ 35256 41942



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Executive Summary

As part of an ongoing planning application with Wrexham County Borough Council (Ref.: P/2026/0291) at Haddon Bank, Erbistock (termed 'the site'), Tyrer Ecological Consultants carried out a Preliminary Ecological Appraisal (PEA) in June 2026.

Following the PEA with included Preliminary Roost Assessment (PRA) which categorised the building as pertaining to '**Moderate**' bat roost potential, Tyrer Ecological Consultants Ltd were commissioned to undertake the recommended further bat surveys; the surveys, totalling two dusk emergence surveys, were carried out in July & August 2026, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

Bats

Based on the results gathered during the 2026 dusk surveys, the building is ascertained to be host to two day roosts; roost 1 host to a single soprano pipistrelle with one emergence location and roost 2, host to two soprano pipistrelle with two emergence locations.

A European Protected Species (EPS) licence will be required from Natural Resources Wales (NRW) for the proposed development to legally proceed.

*A Mitigation Scheme to inform the licence application, and to demonstrate to the Local Authority that the favourable conservation status of the species identified can be maintained, has been provided in **Section 6.0** of this report.*

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

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

Survey Validity

Bat emergence / re-entry surveys are typically **valid for a period of 12 – 18 months**; Natural Resources Wales will typically accept survey data from within the last two years to support a planning or licence application submission, however this is at the discretion of the Local Planning Authority and / or Natural Resources Wales. Should your planning application not achieve consent, or a licence application (where required) not be applied for within this time period, updated surveys may be required.

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1.0 Background & Introduction

1.1 As part of an ongoing planning application with Wrexham County Borough Council (Ref.: P/2026/0291[1]) at Haddon Bank, Erbistock (termed 'the site'), Tyrer Ecological Consultants carried out a Preliminary Ecological Appraisal (PEA) in June 2026.

1.2 The survey was commissioned by Blueprint Architectural Services; proposals are understood to involve a two-storey extension, single-storey rear extension including a covered balcony, and alterations to the roof including the removal of dormers and the erection of a detached garage. See **Figure 1.1** for a proposed site and location plan.

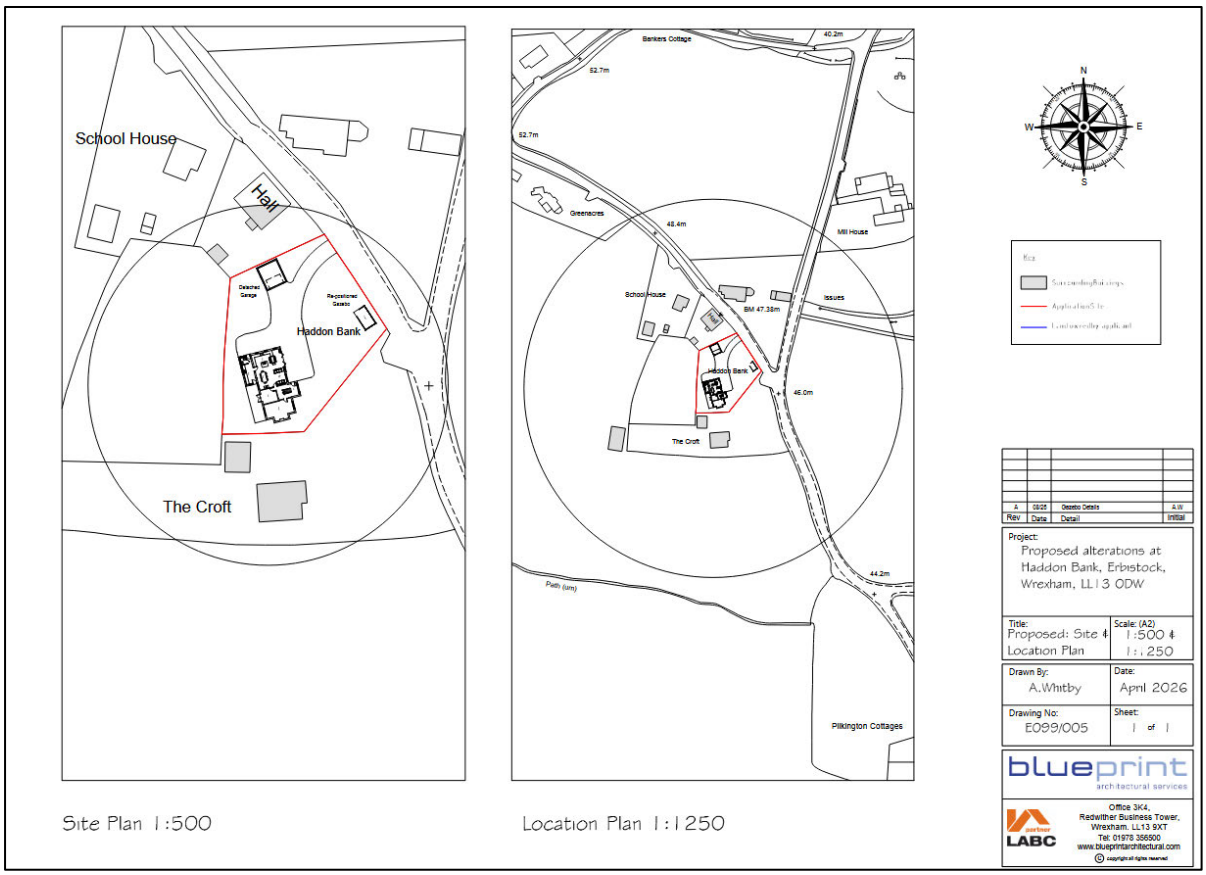


Figure 1.1 – *Proposed site and location plan © Blueprint Architectural Services*

1.3 Included within the PEA was a Preliminary Roost Assessment (PRA) of any built structures and trees on site in relation to bats. Based on the findings of the PRA, Haddon Bank is duly categorised as pertaining to '**Moderate**' bat roost suitability, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023) (see **Figure 1.2** overleaf for a BCT guidance extract).

[1]See:https://register.wrexham.gov.uk/pr/s/detail/a0lSq000002Ax2TIAS?c__r=Arcus_BE_Public_Register&language=en_GB

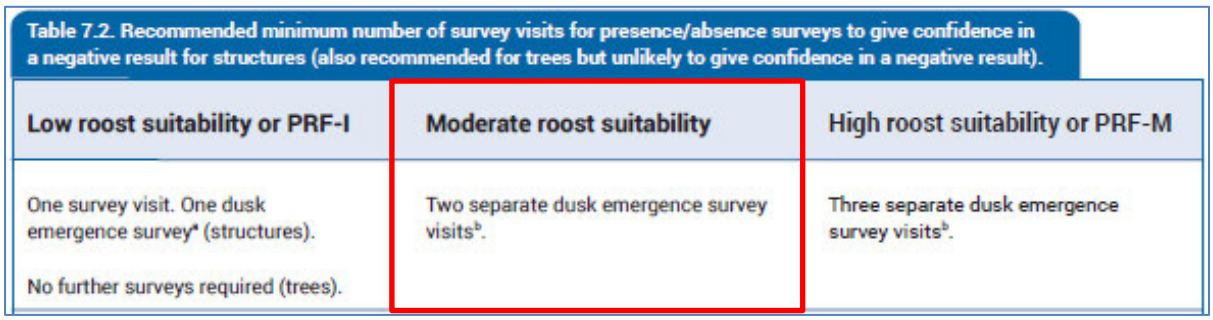


Table 7.2. Recommended minimum number of survey visits for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees but unlikely to give confidence in a negative result).

Low roost suitability or PRF-I	Moderate roost suitability	High roost suitability or PRF-M
One survey visit. One dusk emergence survey[a] (structures). No further surveys required (trees).	Two separate dusk emergence survey visits[b].	Three separate dusk emergence survey visits[b].

Figure 1.2 – *BCT extract on 'Moderate' suitability survey implications*

1.4 Tyrer Ecological Consultants Ltd were therefore recommissioned to undertake the recommended further bat surveys; the two dusk emergence surveys were carried out in July & August 2026, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

1.5 The surveys aimed to identify the presence or reasonably conclude the absence of bats within the building. The results, conclusions and recommendations following the survey, including any mitigation to inform a European Protected Species (EPS) licence application to Natural Resources Wales (NRW), where necessary, will be supplied within this report.

1.6 This report should be read, understood and presented to the local authority as an additional document to **Appendix I** (see Contents page).

2.0 Bats – Legislation & Policy

2.1 All British bats and their **roosts are afforded full protection under the Wildlife & Countryside Act (1981) (as amended) and are listed in Schedule 2 of the Conservation of Habitats and Species Regulations (2017) (as amended). When dealing with cases where an EPS (all UK bats) may be affected, a planning authority is a competent authority within the meaning of Regulation 7 of the Regulations, and therefore has a statutory duty, as the local authority, to have due regard to the provisions of the Regulations in the exercise of its functions.

2.2 Uses of Buildings by Bats

a) Summer breeding roost, and day/occasional roost (May – August)
b) Hibernation roost (October – March)
c) Transitional or temporary roost (other months)

2.3 Roost selection is often closely correlated to suitable foraging habitat within a reasonable commuting distance from the roost and different sites are used depending upon insect densities and abundance; climatic conditions can also affect their ability to successfully forage. All British bats are insectivorous.

*** The term roost is generically referred to as a place that bat/s use for the any of the above reasons, however it should be noted that under the Conservation of Habitats and Species Regulations (2019) (EU Exit) (Regulation 43 (d) the term roost is not used but refers to "a breeding site or resting place of such an animal" and is afforded legal protection. The roost, breeding site or resting place of bats, which ever terminology is used is legally protected whether or not bats are in occupation.*

2.4 Up to 12 bat species have been regularly recorded within the vice-county of Clwyd, which includes Wrexham County, to date, many of which use built structures, notably occupied residential buildings, for roosting. The most frequently encountered bat species is the soprano pipistrelle (*Pipistrellus pygmaeus*) and its abundant status in Clwyd is reflected throughout the UK.

Policy

2.5 The Environment (Wales) Act 2016 ("the Act") requires local planning authorities to have regard to area statements in the development of Local Development Plans. The Act also introduced an enhanced biodiversity and resilience of ecosystems duty (the "Section 6 Duty"). This duty applies to all public authorities in the exercise of their functions in relation to Wales, helping to maximise contributions towards the well-being goals. The Nature Recovery Action Plan supports this legislative requirement by seeking to reverse biodiversity decline, tackle the underlying causes of biodiversity loss, embed nature in decision-making, and increase ecosystem resilience through specific objectives for habitats and species.

2.6 Part 1 of the Act promotes the sustainable management of natural resources. Section 6 states:

"A public authority must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions."

2.7 Section 7 of the Act places a duty on Welsh Ministers to publish, review, and revise lists of habitats and species in Wales that are considered to be of key significance for sustaining and improving biodiversity. Welsh Ministers must also take all reasonable steps to maintain and enhance the habitats and species on these lists, and encourage others to do the same. Section 7, together with the former UK Biodiversity Action Plan (UKBAP), provides the statutory basis for identifying habitats and species of principal importance for conservation in Wales. Equivalent lists for England are published under Section 41 (s.41) of the Natural Environment and Rural Communities (NERC) Act 2006.

2.8 Planning Policy Wales (PPW) 12th Edition (2024) sets out the land-use planning policies of the Welsh Government. It is supported by a series of Technical Advice Notes (TANs), Minerals Technical Advice Notes (MTANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

2.9 PPW (12th Edition, 2024) states:

"The presence of a species protected under European or UK legislation, or under Section 7 of the Environment (Wales) Act 2016 is a material consideration when a planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat and to ensure that the range and population of the species is sustained. Planning authorities should advise anyone submitting a planning application that they must conform with any statutory species protection provisions affecting the site, and potentially the surrounding area, concerned. An ecological survey to confirm whether a protected species is present and an assessment of the likely impact of the development on a protected species may be required in order to inform the development management process. It is considered best practice that screening to determine the presence of protected species should be carried out by a competent ecologist on the basis of data provided by the relevant Local Environmental Record Centre."

2.10 PPW and the National Development Framework (published as *Future Wales – the National Plan 2040*) set out how the planning system at national, regional, and local levels can help deliver these requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).

2.11 PPW also requires developments to achieve a Net Benefit for Biodiversity (NBB):

"Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species (not including non native invasive species), locally or nationally and must work alongside nature and it must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems. A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and longterm, measurable and demonstrable benefit, primarily on or immediately adjacent to- the site. The stepwise approach outlined below is the means of demonstrating the steps which have been taken towards securing a net benefit for biodiversity. In doing so, planning authorities must also take account of and promote the resilience of ecosystems, in particular- the following attributes, known as the DECCA Framework:

- *diversity between and within ecosystems;*
- *the extent or scale of ecosystems;*
- *the condition of ecosystems including their structure and functioning;*
- *the connections between and within ecosystems; and*
- *adaptability of ecosystems including their ability to adapt to, resist and recover from a range of pressures likely to be placed on them through climate change for example.*

2.12 PPW further highlights the importance of Green Infrastructure (GI) at both local and landscape scales:

"The Environment (Wales) Act 2016, provides a context for the delivery of multi-functional green infrastructure. Its protection and provision can make a significant contribution to the sustainable management of natural resources, and in particular to protecting, maintaining and

enhancing biodiversity and the resilience of ecosystems in terms of the diversity within and connections between ecosystems and the extent and condition of these ecosystems, so that they are better able to resist, recover from and adapt to pressures. This means that the development of green infrastructure is an important way for local authorities to deliver their Section 6 duty."

2.13 There are several plans, strategies and national, sub-regional and local policy statements which provide a framework for development in the Plan area. The Planning and Compulsory Purchase Act (2004) makes it a requirement for local planning authorities in Wales to prepare a Local Development Plan (LDP) for their areas.

2.14 Cyngor Bwrdeistref Sirol Wrecsam / Wrexham County Borough Council prepared a Local Development Plan 2013-2028 which was formally adopted in December 2023 and superseded any previous development plans for the area. The Local Plan 2013-2028 was, however, withdrawn in May 2025, and so the previous Wrexham Unitary Development Plan 1996-2011 remains in effect.

2.15 Policies PS11, GDP1h, and EC6 of the Wrexham Unitary Development Plan 1996-2011[2] mirror these statements within PPW 2024 and go on to state the following in **Table 2.1** below:

Table 2.1 – Relevant policies

Title	Summary
Policy PS11 – Biodiversity	Encouragement will be given to proposals which improve the biodiversity value of sites and to the establishment of local nature reserves where the nature conservation and landscape interest of the land will be protected and enhanced.
Policy GDP1 (h) – Development Objectives	All new development will safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.
Policy EC6 – Biodiversity Conservation	Development either within or close to sites of biodiversity interest will only be permitted where it can be clearly demonstrated that the need for the development outweighs the need to safeguard the intrinsic nature conservation value of the site. Where such development is permitted, damage should be kept to a minimum, and compensatory measures should be provided. Measures to improve the biodiversity value of sites and enhance their natural conservation interest and landscape quality including the establishment of local nature reserves, will be supported.

[2] See: https://www.wrexham.gov.uk/service/development-plans-and-other-planning-policy/unitary-development-plan-1996-2011

3.0 Survey Methods

3.1 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023) edition states:

"*The guidelines do not aim to either override or replace knowledge and experience. It is accepted that departures from the guidelines (e.g. either decreasing or increasing the number of surveys carried out or using alternative methods) are often appropriate. The guidance should be interpreted and adapted on a case-by-case basis according to site-specific factors and the professional judgement of an experienced ecologist. Where examples are used in the guidelines, they are descriptive rather than prescriptive."*

3.2 Relative to the above the survey protocol has been determined using the collective and long-standing experience of Tyrer Ecological Consultants Ltd and knowledge of the specific nature of the site.

Survey Protocol

3.3 The surveys took place in July & August 2026, thus within the highly active and social breeding season, when females have given birth in established maternity sites and at a time when young begin to fly.

3.4 In accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023), it is specified that:

"*The bat active period is generally considered to be between April and October inclusive*", though the period of **May – August** is the optimal most productive period that NRW accept bat surveys and grant EPS licences in relation to bats.

3.5 Typically only surveys within this period are accepted by licensing authorities, as the results of these surveys are used to inform an EPS licence application or a non-licensable Precautionary Working Method Statement (PWMS).

3.6 Where bats are roosting, they are likely to be detected by the ecologists who are trained in the use of bat detector hardware and call analysis software, and specifically how to detect bats and to correctly identify / disseminate bat calls.

3.7 When considering survey protocol, the decisions about whether dusk or dawn surveys are selected are based on the extensive experience of Tyrer Ecological Consultants Ltd, the nature of the building and species that can be anticipated as being present either at the property or in the locality as well as any visual limitations at the survey site.

3.8 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023), it is specified that:

"Roost re-entry visits prior to dawn are no longer routinely recommended for presence/absence surveys due to the risk of bats returning early and being missed … As return times appear to be far more variable (Andrews & Pearson, 2022)."

3.9 In this case, the bat roost potential that exists at Haddon Bank presents no problems for dusk observations; if a building is complex, or observations were restricted, or species that are difficult to detect at dusk are suspected then dawn surveys would be conducted where appropriate. At the site there are no visual constraints and to date there is no evidence to suggest the presence of such species.

3.10 Survey protocol should not be determined by parties who are 1) not familiar with the site 2) do not have a sufficient level or experience in relation to the undertaking of dusk / dawn bat surveys.

3.11 The number of surveys and surveyors was adequate relative to the roost potential that was identified on attendance of the site, i.e. **'Moderate'**, and requiring three surveyors to accurately monitor potential roost features (PRFs) across the structure. Surveyor credentials are provided in **Table 3.1** below:

Table 3.1 – Surveyor credentials

Surveyor(s)	Experience	Surveyor Credentials
Mr. J. Pescod ACIEEM	10 years	• Principal Ecologist with extensive training and experience, • MRes Advanced Biological Sciences, BSc (Hons), • Accredited agent on the Natural Resources Wales Bat Licence of Mrs. K. Wilding (S093795-1).
Miss. J. Collins	3 years	• Junior Ecologist, with a range of training and experience, • BSc in Wildlife Conservation and MSc in Wildlife Conservation and Drone Applications, • Accredited agent on the Natural Resources Wales Bat Licence of Mrs. K. Wilding (S093795-1).
Dr. H. Taylor-Boyd	8 years	• An experienced seasonal consultant with extensive experience of undertaking professional bat surveys.
Mr. D. Boyd	8 years	• An experienced seasonal consultant with extensive experience of undertaking professional bat surveys.
Miss T. Hesketh	5 years	• Experienced Seasonal Ecologist with a range of training and experience, • BSc (Hons.) Biology and MSc Conservation Management (a CIEEM accredited course).

3.12 Surveyors were strategically positioned so that all elevations with bat roost potential could be observed without limitation. The surveyors were aided by full spectrum electronic bat detectors including the Anabat Scout, Elekon Batlogger M & M2, Echometer EM2 Pro, Peersonic RPA3, or equivalent detectors which enable the locating and recording of the high frequency calls that are emitted by bats; echolocation calls were analysed the next day using, Anabat Insight, Kaleidoscope, BatExplorer, Sonobat or equivalent computer software to verify field observations.

3.13 Where deemed necessary and appropriate by the attending ecologist(s), elevations were also surveyed via the use of Night Vision Aids (NVA), with deployment undertaken in line with relevant guidance documents, including Bat emergence surveys with night vision aids: A technical guide for professional ecologists (BCT, 2026) and Thermal Imaging: Bat Survey Guidelines (Fawcett Williams, 2021).

3.14 Devices such as near infrared (NIR) imaging cameras (Panasonic HC-VXF990, Canon XA35, Canon XA70, Nightfox Whisker & Nova Night Vision Binoculars) were utilised in combination with NIR lighting apparatus (for example Nightfox Arc, Nightfox XB5, or additional spot lights & floodlights). Thermal imaging equipment (such as the Thermal Master DV2) was also deployed by the survey team when necessary, in combination with the NIR systems as described. See **Figures 3.1 – 3.2** overleaf for NVA deployment examples.



Figure 3.1 – *NVA image of B1, as viewed from the south-west.*



Figure 3.2 – *NVA image of B1as viewed from the north-east.*

3.15 In accordance with the Good Practice Guidelines, NVA recordings were subject to review as soon as possible following completion of the survey, typically the following day, to identify emergences / flight lines and species / abundance.

Survey Limitations

3.16 Following the completion of the further surveys, having carefully considered the results and conclusions derived from all surveys to date, no significant constraints were experienced that might hinder the gathering of ecological data on which to base sound conclusions and recommendations.

4.0 Results

4.1 Two dusk emergence surveys were undertaken at the site, during July & August 2026 by three surveyors at any one time. **Table 4.1** shows survey timings and weather conditions, whilst **Tables 4.2 – 4.3** alongside **Figures 4.1 – 4.6** document the results of the surveys.

Table 4.1 – Survey date, times and weather conditions

Times of Survey	Date	Weather Conditions
Dusk survey 1 2104 – 2254	20/07/2026	**Sunset: 2124:** Dry, Calm (0/12 Beaufort), 0% cloud cover Start temp: 17ºC End temp: 15ºC
Dusk survey 2 2028 – 2218	10/08/2026	**Sunset: 2048:** Dry, Light air (1/12 Beaufort), 0% cloud cover Start temp: 18ºC End temp: 13ºC

Table 4.2 – Dusk survey results

Survey Dates	Time	Activity
20/07/2026	2104 – 2254	**Summary: Emergence of three soprano pipistrelles from three separate roost locations (EP1 – EP3).** 2132 hrs: A soprano pipistrelle (SP) emerged from a gap beneath a lifted roof tile on the north-western side of the northern gable verge. **EP1** 2136 hrs: An SP emerged from beneath lead flashing on the western facing side of the chimney on the southern gable verge, and commuted round the western elevation heading north. **EP2** 2139 hrs: A noctule (Noc) commuted over the site to the south-east. An SP commuted along the western elevation heading north. 2140 hrs: An SP emerged from the south-western corner of the roof verge beneath a lifted tile where a gap in the mortar is present. **EP3** 2145 hrs: A Noc commuted high over the building from east to west. 2146 hrs: A common pipistrelle (CP) commuted from south to north across the eastern garden. 2157 – 2223 hrs: A CP occasionally foraged along the southern elevation of the structure heading back and forth from east to west and within the eastern garden. 2201 hrs: A CP commuted along the western aspect of the building from north to south and then over the building to the east. 2204 hrs: A lesser horseshoe (LHS) commuted along the western hedgerow from north to south.

Survey Dates	Time	Activity
		2213 hrs: A SP commuted along the western elevation from north to south. 2218 hrs: A CP foraged over the apex of the roof. 2224 hrs: A CP commuted from the north to the south across the eastern garden. 2221 hrs: An SP foraged within the south-western garden. 2226 – 2235 hrs: A Daubenton's bat (Daub) occasionally commuted over the southern aspect of the site. General activity comprised of frequent foraging and commuting by a single common pipistrelle and soprano pipistrelle, alongside occasional passes by a Daubenton's bat and single passes by a lesser horseshoe bat and a noctule.
10/08/2026	2028 – 2218	**Summary: Emergence of a single soprano pipistrelle from a gap beneath a lifted roof tile on the north-western side of the northern gable verge. EP1** 2055 hrs: An SP emerged from emerged from a gap beneath a lifted roof tile on the north-western side of the northern gable verge. **EP1** 2059 – 2104 hrs: An SP sporadically commuted along the western aspect from north to south. 2105 – 2109 hrs: An SP constantly foraged along the western hedgerow and within the northern garden. 2114 hrs: A Noc was heard not seen. 2115 – 2121 hrs: Up to two SP frequently foraged within the western garden and around the south and south-eastern elevations of the building. 2120 – 2129 hrs: An SP sporadically foraged within the northern garden. 2128 hrs: A CP foraged within the western garden and around the southern elevation of the target structure. 2210 hrs: An SP was heard not seen. 2135 hrs: A brown long-eared bat (BLE) commuted along the western hedgerow and round the southern hedgerow. 2138 hrs: An SP foraged round the eastern elevation of the building and along the southern corner. 2146 hrs: An LHS was faintly heard not seen. 2147 – 2218 hrs: An SP was regularly heard foraging but not seen.

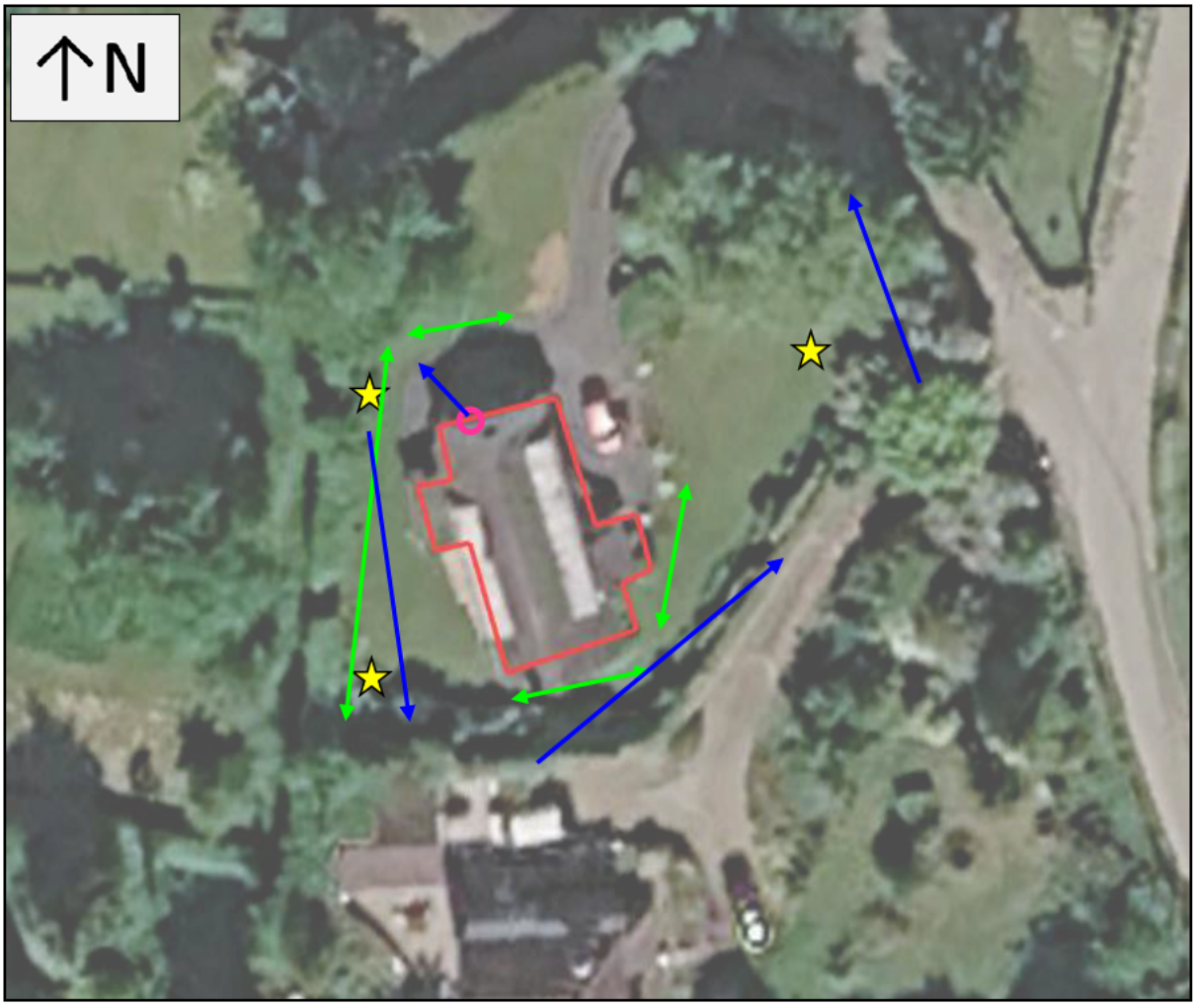
Survey Dates	Time	Activity
		2149 hrs: A CP commuted along the eastern hedgerow heading north. General activity comprised of regular foraging and commuting by a single common pipistrelle and up to two soprano pipistrelles alongside brief passes by a noctule, one brown long-eared bat and an individual lesser horseshoe bat.



Dusk Survey 1 – 20/07/2026

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

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



Dusk Survey 2 – 10/08/2026

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

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



Figure 4.3 – *Location of emergence points © Google Earth Pro 2026*

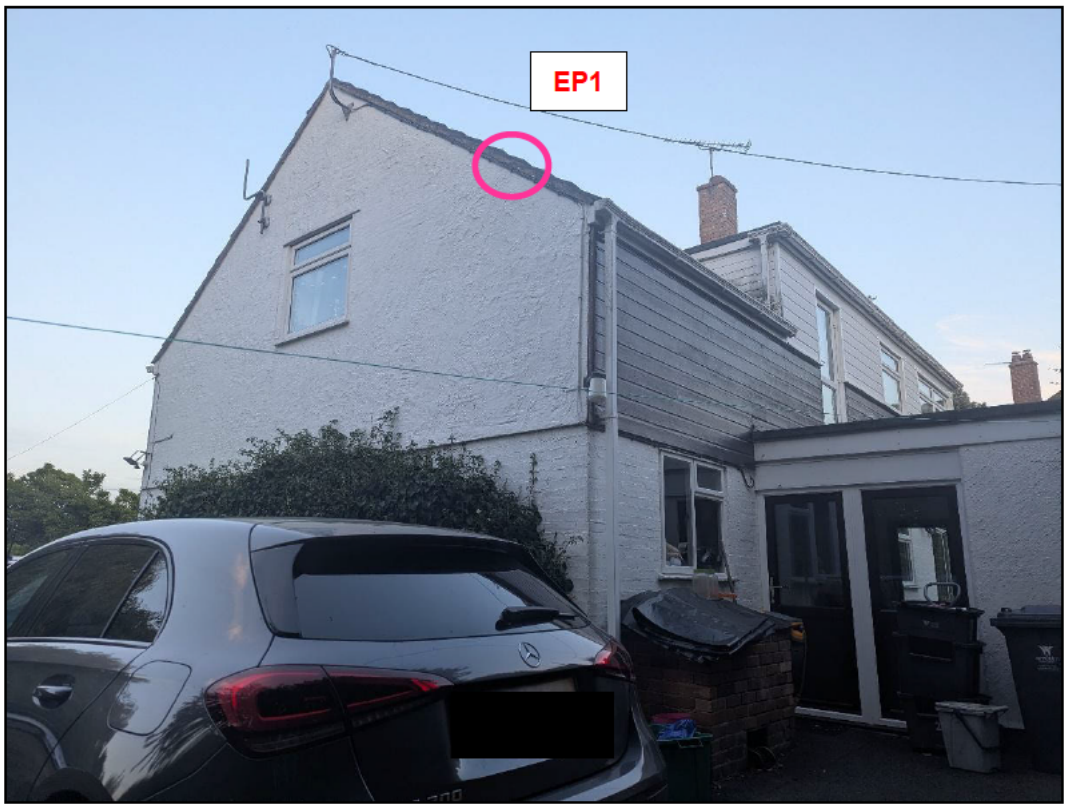


Figure 4.4 – *Location of Emergence Point 1 on northern gable verge (EP1)*

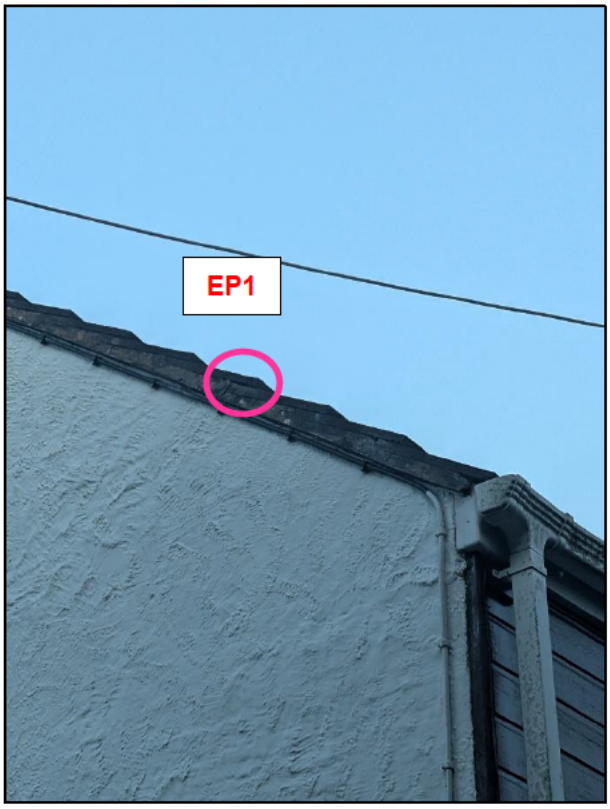


Figure 4.5 – *Close up of Emergence Point 1 beneath lifted gable verge tile where the mortar is missing (EP1)*



Figure 4.6 – *Location of Emergence Points 2 & 3 on the southern gable verge (EP2 & EP3)*

5.0 Conclusions & Recommendations

5.1 Based on the results gathered during the dusk surveys, the building is ascertained to be host to two day roosts. As per the UK Bat Mitigation Guidelines 2025, Roost 1 is host to a single soprano pipistrelle with one emergence point with EP 2 – 3 classified as a single roost (Roost 2) to two soprano pipistrelle bats.

5.2 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023) describes a day roost as the following:

Day roost: *"A place where individual bats, or small groups, rest or shelter in the day during the summer."*

5.3 For clarity, the roost categorisation, location and access points have been provided in **Table 5.1** below, alongside the site status assessment and the conservation significance[3] of the roost:

Table 5.1 – Roost locations and access points at Haddon Bank

Structure Reference	Species	Count	Roost Location	Access Points	Site Status Assessment	Conservation Significance
Haddon Bank	Soprano pipistrelle	1	Gap beneath roof tile	EP1 – gap beneath a lifted roof tile on the north-western side of the northern gable verge	Day	Site
Haddon Bank	Soprano pipistrelle	2	Gap beneath roof tile	EP2 – gap beneath lead flashing on the western facing side of the chimney on the southern gable verge. EP3 – south-western corner of the southern gable verge beneath a lifted tile where a gap in the mortar is present	Day	Site

5.4 Based upon Natural Resources Wales guidance[4], the proposed works do not represent a "Higher risk case" as per the qualifying criteria for a higher risk case, and do not meet any of the relevant sections outlined below:

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

[3] As extracted from **Reason, P.F. & Wray, S.** 2025. *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.2*. Chartered Institute of Ecology and Environmental Management, Ampfield

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

5.5 Proposals are understood to involve significant alterations to the dwelling including a two-storey extension, single-storey rear extension including a covered balcony, and alterations to the roof including the removal of dormers, re-rendering works and the erection of a detached garage. See **Figures 5.1- 5.2** for the location of the roosts relative to the existing and proposed site plan.

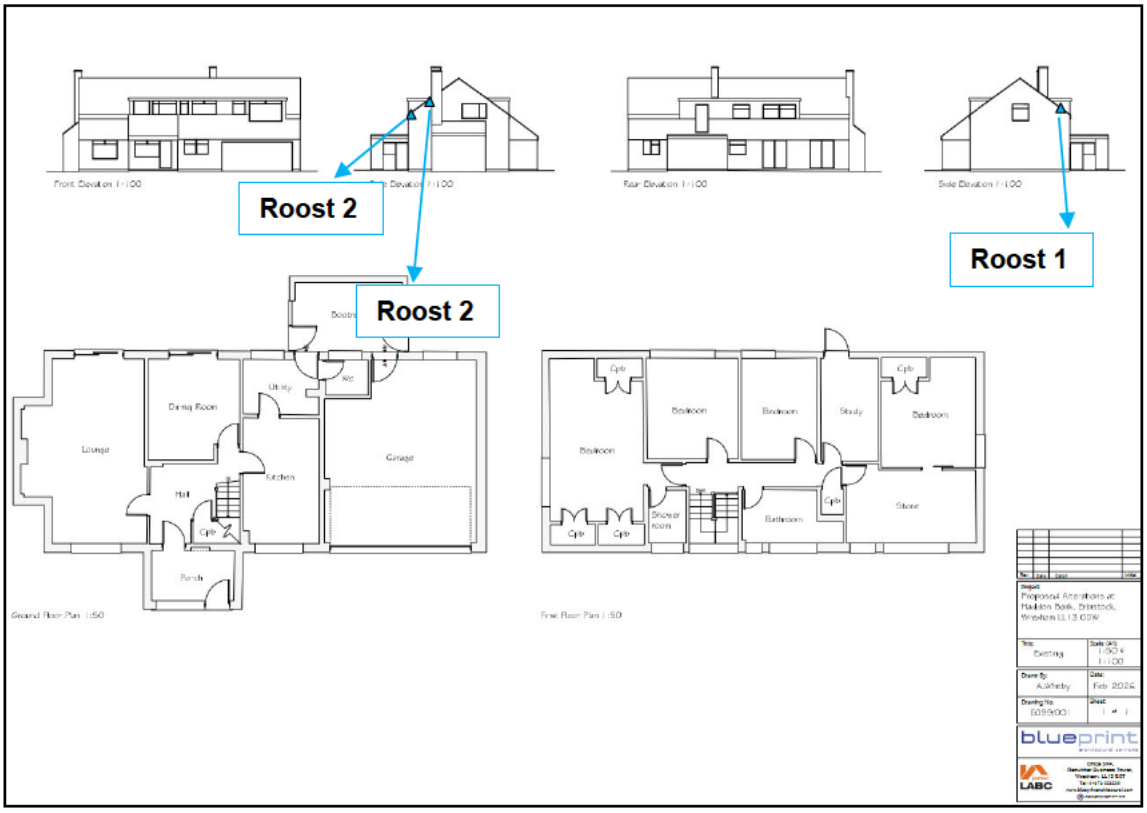


Figure 5.1 – *Approximate location of existing roost over existing site plan © Blueprint Architectural Services*

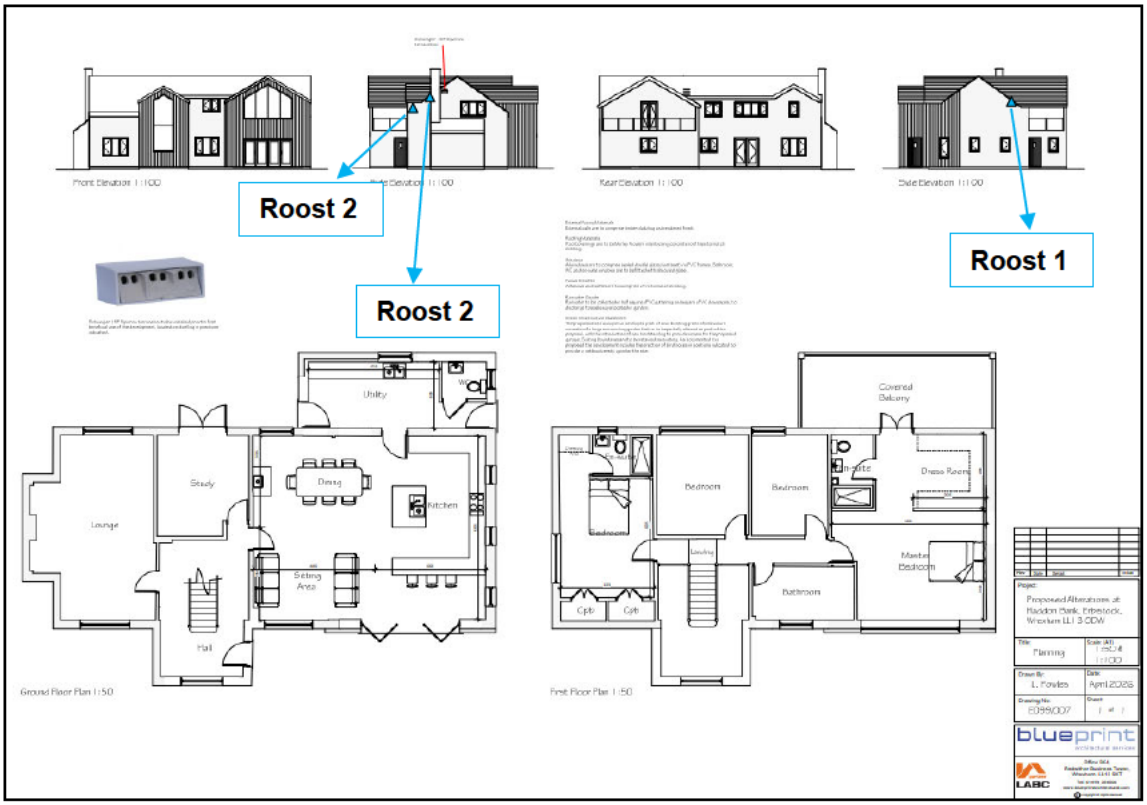


Figure 5.2 – *Approximate location of existing roost over proposed site plan © Blueprint Architectural Services*

5.6 Based on the above, impacts to a protected species will need to be addressed from both a conservation and legal perspective, along with the application of appropriate mitigation before any works can take place. A European Protected Species (EPS) licence from NRW will be required to legally impact upon places that are actively used for breeding, rest or shelter (roost) by bats, **however, before a licence can be applied for all planning issues need to be resolved.**

5.7 In order that the LPA can implement its obligations under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), appropriate and proportionate mitigation will need to accompany the planning application which will demonstrate that the "favourable conservation" of the species concerned can be maintained.

5.8 Additionally, it should be noted that installation of new lighting as part of a development scheme that exceeds current levels may have a negative impact upon foraging / commuting bats confirmed as present in the vicinity, particularly if increased light spillage occurs in areas currently valued and relatively free from illumination. There are several measures that can be used to offset impacts upon bats, where lighting is unavoidable; these include, however are not limited to: the light source used and luminaire design, and accessories to direct light at its intended target. Numerous software programmes are currently available which can be used inform lighting plans, demonstrating how lighting decisions will illuminate a site. The reader is referred to the Bat Conservation Trust's 'Bats and Artificial Lighting at Night' guidelines (August 2023) for further information.

6.0 Conclusions & Recommendations

6.1 From the evidence gained during the surveys, the use of the site is considered to be of 'Site' level significance for soprano pipistrelle bats and their current conservation status (as according to current EPS mitigation licencing applications); the proposed mitigation is proportionate to that use. However, if at any time that assessment is revised to a higher level, then the mitigation will also be accordingly revised.

6.2 The following procedures and mitigation recommendations are designed to allow the Local Planning Authority (LPA), in association with their ecological advisors, to determine a Planning Application where an EPS has been identified and will be affected by the work for which the Planning Application seeks consent.

6.3 In addition, LPAs, in accordance with the obligations placed upon them by way of their duties under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), have to take into consideration the presence of a European Protected species (EPS) before determination of an application where it / they have been identified.

6.4 The LPA will consider the mitigation in relation to the potential success of a Natural Resources Wales licence application and if, in their opinion, the mitigation is considered as being appropriate, or if it is over and above what is required; if they determine that the mitigation is appropriate, then **a Planning Condition should be attached**, stating that works should be carried out in accordance with the recommendations within this bat report. In addition, **it is imperative that the necessity for a licence is included in the Notes to Applicant** section at the end of the decision notice. If the LPA consider that the mitigation is over what is necessary but require "enhancement" as part of their Local Biodiversity / Green Infrastructure Planning Policies, this should be included in the terms of Consent. The acting bat ecologist, in this case, deems the proposed new roost creation as appropriate and not over and above what is required.

6.5 Notwithstanding that Planning Consent is granted, or equally if the work is undertaken outside of the planning system, whereby projects that do not require planning consent may affect bats or their roost (including disturbance), it does not absolve the applicant, site owner, developer or any other party involved with the work from ensuring that an application is made for an EPS licence to legally undertake work that will affect bat(s) or their roost(s). If work is undertaken without a licence and bat(s) or their roost(s) is/are affected, then a breach of current wildlife legislation will occur, for which penalties are severe.

6.6 Under Regulation 53(1) and 56(3)(a) of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), a licence is required prior to disturbing bats or destroying / damaging or obstructing any place that is used by bats as a resting place or breeding site. The licence is issued by the EPS Licensing Team of NRW.

Summary of Mitigation

6.7 With the existing structure subject to significant renovations including extensions, dormer removals and re-rendering, it is acknowledged that the presence of a roosting bat needs to be addressed from both a legal and conservation perspective. For the purposes of this report**, it is considered that the roosts will be subject to destruction**; as such, there is a necessity to consider alternative solutions.

6.8 The mitigation proposals outlined in this report are seen to form the most productive way forward that will retain long term roosting opportunities for bats and minimise disturbance whilst also enabling the applicant to undertake the proposed works.

6.9 Commuting routes are generally located to the borders of the site, where hedgerows and individual trees are present that coincide with an absence of illumination. The key commuting routes appear to be retained at the post-development stage and thus, will continue to provide cover and foci for bats to guide them through the landscape. Additionally, given the structure is currently occupied, there is not considered to be a significant increase in lighting levels. The creation of a detached garage may result in an increase in lighting within the site boundary, however, no lighting is currently indicated to be installed at the garage and thus, the overall works are considered to entail a net neutral impact on the commuting routes to the boundaries of the site and existing foraging habitat within the garden.

6.10 To ensure lighting impacts do not result in any impact to the existing commuting and foraging habitats, it is recommended that a bat-friendly lighting plan is produced for the site, which should include measures to avoid illumination of key commuting routes on the boundaries of the site, as well as foraging areas and priority habitats off-site. In addition, no lighting should be directed at roost provision as specified below.

6.11 This lighting plan should be produced by a suitably qualified lighting specialist and should be checked by a licenced bat ecologist against this dusk report to ensure that roost provision and key commuting / foraging areas are not subject to intense lighting.

6.12 To ensure that bats are not left without a roost while works take place that could displace bats from their roost at the building, a tree-mounted receptor roost will need to be installed at the site. The tree-mounted box should be a Schwegler 2F Bat Box[5] (or suitable equivalent – to be agreed with the express consent of the ecologist). Receptor roosts serve as a receiver unit for if bats must be captured and translocated to it by the licenced ecologist during the works schedule. The receptor roost should be installed and be in place prior to any deconstruction works and be within a reasonable distance and line of sight of the existing roost(s). The bat box will be retained post works to serve as a permanent roost provision following the works (see **Figure 6.2** overleaf).

Works to be undertaken by the Ecologist

6.13 **Licence Application:** A protected species licence from NRW will be applied for by a suitably qualified Ecologist, subsequently the 'Named Ecologist', in conjunction with the applicant, which will provide details of the measures undertaken to maintain the favourable conservation status of the bats present on site.

6.14 **Toolbox Talk:** Once a protected species licence is in place, at the pre-commencement stage the Named Ecologist (or accredited agent) is to undertake a site induction 'Toolbox talk' to the Licensee and all contractors on possible bat presence and discuss document features taken from the license, i.e. license, method statement, mitigation figures and work schedule to be kept on site for the duration of the work.

6.15 **Pre-commencement Check**: Prior to any work being undertaken the presence / absence of bats, as far as is possible, will be established by the Named Ecologist (or accredited agent) undertaking a thorough investigation of the areas at which bats have been observed using the site. This will involve a thorough inspection of these areas during dismantling using endoscopes and / or narrow-beam torch, as necessary, and will involve a soft strip at the local areas of interest, as necessary, which involves the careful lifting, inspecting and removal of components.

6.16 **Timing Implications:** No timing implications are necessary in relation to the day roost on site with building identified to be host to a non-classic hibernation suitability of 'Low'. However, individual bats will sometimes utilise non-traditional hibernation sites on an occasional basis, including loft spaces or external crevices on buildings. In the unlikely event that hibernating

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

bats are discovered during the works, the works will immediately stop and the area the bat was found will be made good. No hibernating bats will be moved. Additionally, it is also recommended that all works to the structure are undertaken in the following suitable weather conditions, to minimise the risk of harm for any torpid bats, subject to their presence:

- It is dry / calm,
- Temperatures are no lower than 8°C for at least an hour or two from dusk on 3-4 consecutive nights.

6.17 **Ecological Clerk of Works:** The Named Ecologist (or their accredited agent) will supervise careful dismantling of all places of bat roost interest. In addition, at the Named Ecologist's discretion, wherever opportunities for bats exist in other areas of the building, supervised dismantling / inspections will extend to these areas with strategies for safely removing bat(s) applied. All dismantling of potential roost features will be undertaken during favourable weather conditions (above 9ºC, low wind).

6.18 **Exclusion:** Where crevices are extensive, or where it cannot be conclusively ascertained that bats are absent from a crevice, exclusion devices may be fitted for a period of 3 days and 3 nights, or longer, at the Named Ecologists discretion – this is where material is placed over the entrance area(s) of a roost allowing bats a means of escape whilst preventing them from re-accessing. This method will only be adopted if necessary, and exclusion fitted cavities will only be filled in following this process. **The fitting of exclusion devices will not be undertaken during November-March.**

6.19 **Capture:** Any bats located by the Named Ecologist (or accredited agent) will be removed, placed in a secure box with soft tissue and transferred into the receptor roosts that will have been previously erected as indicated below. If bats are in ill-health they will be taken into care by a previously nominated bat carer. **Only once it has been conclusively established by the Named Ecologist that bat(s) are absent can works continue to completion.** In the unlikely event that bats are found outside of supervision time, then as legal requirement and conditions of the licence, work will immediately cease, and the named Ecologist will be contacted for further advice; contractors must not touch, handle or in any way cause bats to move without ecological supervision.

Works undertaken by the contractor

6.20 Two day roosts, Roost 1 host to a single access point and Roost 2 host to two access points, were identified on site. All roosts are considered to be destroyed during the proposed works. Given the building is subject to significant renovations, retention or modification of the identified roosts are not possible.

6.21 As such, it is considered that the most feasible and productive approach in terms of maintaining the favourable conservation status of the identified species roosting on site is to integrate novel roosting provision back into the renovated structure. The following measures will be undertaken at the site, in tandem with the proposed retention of the receptor roost:

- Two integrated bat boxes will be installed, one on the southern elevation of the created two-storey front (east) extension and on the northern elevation of the proposed works in proximity to existing commuting and foraging habitat. The integrated measures should be two Ibstock Enclosed Bat Box 'C'[6] and will remain unilluminated. The landing pad should be 'roughed' to ensure that bats are able to grip surface. Given these aspects of the building are to be rendered, the boxes may also be rendered over however, the landing pad and access point should not be blocked or impacted in any way that may negatively influence roosting bats. See **Figures 6.3** below for proposed mitigation locations.

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

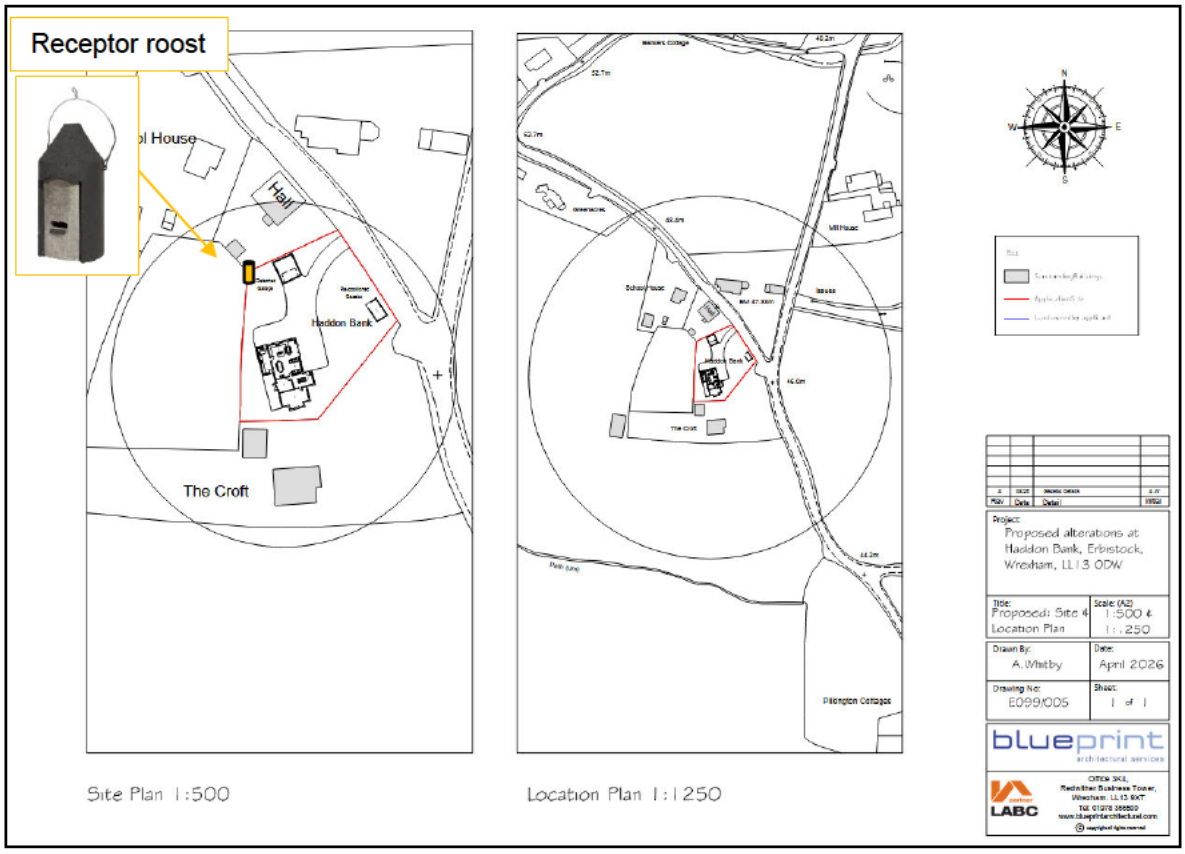


Figure 6.2 – *Proposed location of receptor roost over proposed site & location plan © Blueprint Architectural Services*

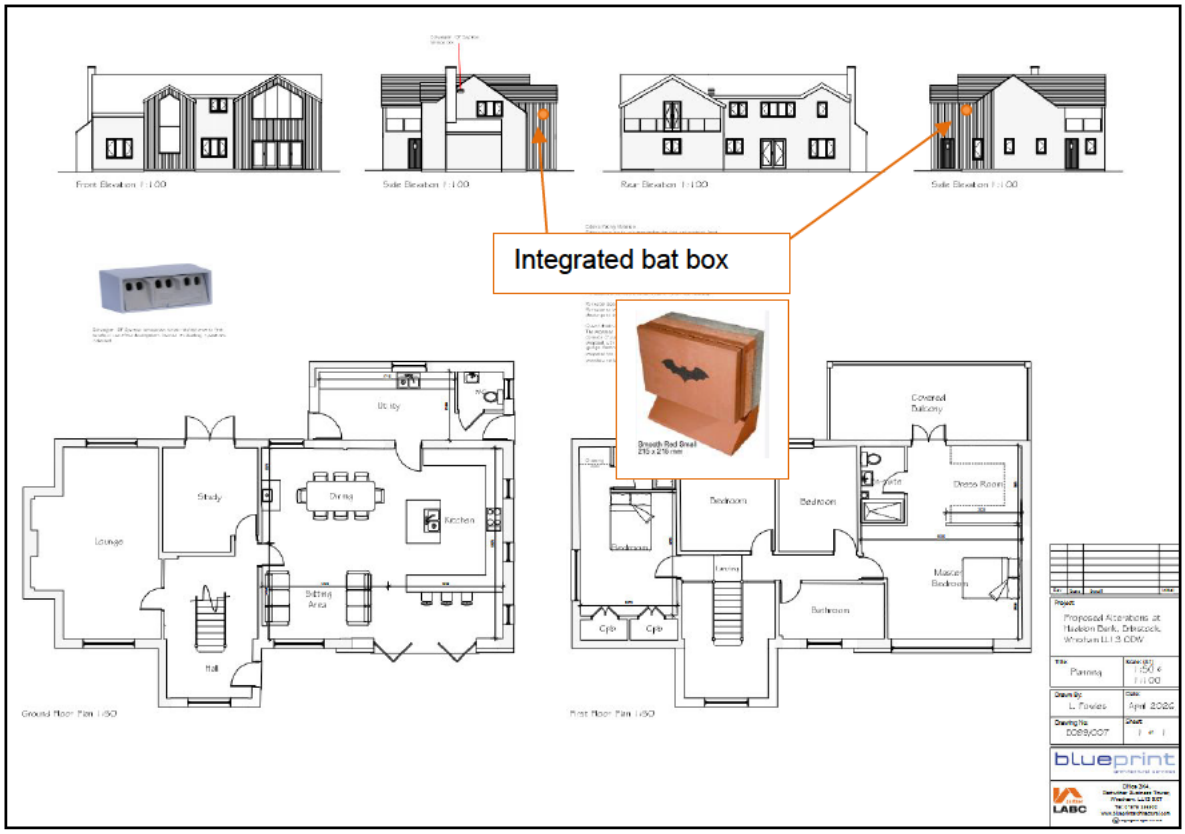


Figure 6.3 – *Proposed location of mitigation measures over proposed elevation plan © Blueprint Architectural Services*

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

6.23 Monitoring of the site for a period of two years minimum post-works will be carried out, in line with NRW guidance, as stated following current guidance (Bat Mitigation Guidelines).

6.24 Lighting must not be directed at or close to the roost areas nor will it affect nearby foraging places or flight lines. The lighting plan recommended above should take into account the proposed roosting mitigation, and all flight lines to and from these features should be unilluminated at key times.

7.0 References

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Appendix I: *PR-26-0163 Haddon Bank – Preliminary Ecological Appraisal* (Tyrer Ecological Consultants Ltd, August 2026)