Preliminary Bat Roost Assessment

For

Michael Fox

2 Penbryn

Church Road Minera

Gwynfryn

Wrexham

LL11 3DD

Reference: Q-PH-202609-202

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Disclaimers

All information set out in this report is true and based on the opinions and knowledge of ProHort at the time of writing. This report has been set out for the sole use of the client under the conditions set out in this document.

Although no evidence of bat activity or presence (such as droppings, staining, feeding remains, or direct sightings) may be observed during this preliminary roost assessment, it is important to note that the absence of such evidence does not confirm the absence of bats. Bats are highly mobile species that can occupy suitable roosting features intermittently and may use different roosts at different times of the year.

Therefore, the site or structure should still be considered as having **potential to support roosting bats** if suitable features are present. Further survey work (e.g. dusk emergence surveys) may be required to determine actual use by bats and to confirm the presence or absence of a roost.

This assessment represents conditions observed at the time of survey only and cannot account for future changes in site conditions or bat use.

This report was prepared to the standard set out in the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. Adhering to this guidance, this report is considered valid for a period of 18 months after the date of the site visit. After this date, this report will no longer be an accurate assessment of the current conditions of the site/project area.

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Summary

ProHort Ltd were commissioned to conduct a Preliminary Roost Appraisal at the property 2 Penbryn, Church Road Minera, Gwynfryn, Wrexham LL11 3DD (grid reference: SJ 26610 51969) to advise on the potential for the presence of bats and nesting birds at the property and support the planning application.

The planning application is to construct an extension to the property. This may potentially close access points and impact roosting points for bats and birds.

A desk study prior to the visit took into account other surveys carried out, as well as freely available records. Additionally, a daytime internal and external inspection of the building was undertaken to search for any potential roosting features such as damage to the structures on Site, or signs such as droppings, staining or the presence of bats and nesting birds internally.

The preliminary roost assessment identified no signs of bats. The external assessment of the property identified that the building had 'low potential' for roosting bats due to the low number of available roosting locations. Additionally, no signs of breeding birds were found during the site visit.

Precautionary measures have therefore been recommended in line with good practice to confirm whether bats roost in the suitable features on site, and if they do, to inform the best approach to mitigation, compensation, and licencing.

For full details, please read the report in its entirety.

1. Introduction

ProHort Limited have been commissioned by Michael Fox to conduct a Preliminary Roost Assessment for 2 Penbryn, Church Road Minera, Gwynfryn, Wrexham LL11 3DD (grid reference: SJ 26610 51969) on the 5th October by Lydia Shabong of ProHort Limited, hereafter referred to as the 'Site'.

The purpose of the survey was to assess the likely presence of bats and breeding birds at the property, to identify any features, habitats or species which would constitute potential constraints to any development which may take place on the Site, and to make recommendations for mitigation and/or further survey work.

The planning application for the site is to build an extension on the property on the front and side aspects, as well as install roof windows.

1.1. Site location

The Site is a disused residential property located at 2 Penbryn, Church Road Minera, Gwynfryn, Wrexham LL11 3DD (grid reference: SJ 26610 51969). There were no trees identified on the site during the site visit.

The land surrounding the main building on site is made up of a mixture of hard standing, amenity grassland and woodland. The site is located in a predominantly agricultural area, with a mix of agricultural buildings and fields, woodland parcels and residential properties.

The site is approximately 55 metres squared in size.



Figure 1 – Red line boundary of the Site
Taken from Bing Maps (© 2026 Microsoft Corporation, © 2026 Maxar, ©CNES (2026) Distribution Airbus DS)

1.2. Aims and Scope of the Report

Bats and nesting birds are protected by the Wildlife and Countryside Act (1981) (as amended), as detailed in Appendix 2. A PRA is required to prevent a breach of legislation regarding the protection of bats and nesting birds.

The report is based on the results of the preliminary roost assessment (PRA), conducted in line with the Bat Conservation Trust (BCT) Good Practice Guidelines 4th Edition (Collins, 2023). This report aims to:

- Assess any external and internal features (where applicable) that bats could use for entry/exit, roosting and to search for signs of bats.
- Where trees are present on the Site, each tree will be assessed from ground level for features that bats could use for roosting.
- To determine the actual or potential presence of bats.
- Establish whether the proposed works hold the potential to impact on roosting bats and identify whether there is a requirement for further activity surveys (e.g. emergence/re-entry), which may inform the need for a bat European Protected Species (EPS) license or Bat Mitigation Class License (BMCL) to allow the works to proceed lawfully.
- Identify any evidence of nesting birds.

No earlier information is available from prior reports carried out at the site.

2. Methodology

2.1. Preliminary Roost Appraisal (PRA)

A preliminary roost assessment survey of the building was carried out on the 5th October. The survey was to assess the potential for bats to utilise any buildings or trees on Site and the results would determine if further surveys were necessary. The following features of the on-Site structures were assessed:

- Type of building/tree.
- Age of building/tree.
- Potential crevices and spaces where bats may enter.
- Any evidence of bat presence such as droppings, staining or feeding remains.

2.2. Site Survey

Lydia Shabong undertook the PRA on the building, and other objects of interest on the Site.

The survey was undertaken in accordance with the Bat Conservation Trust (BCT) Good Practice Guidelines 4th Edition (Collins, 2023). A thorough search for evidence of bats was undertaken in any internal loft spaces or voids and on any external features of the buildings, notably any windowsills, walls, floors and flat surfaces, and on the trees including any cavities, knot holes, tear outs, and external features.

Evidence of roosting bats include:

- Presence of live/dead bats.
- Bat droppings (can be distinguished from rat/mouse droppings by their crumbly texture).
- Staining from fur around access points.
- The presence of feeding remains, such as insect wings and casings.
- Absence of cobwebs around crevices

A building/tree would be identified as a 'confirmed' bat roost if evidence of roosting bats was recorded. This will be classified as low, medium or high confirmed roost, to consider the potential for other undiscovered roosts to be present.

Most native bats in the UK are crevice-dwelling or roof-dwelling species, roosting in remote areas such as within loft spaces, between tiles and membrane, behind cladding, at wall tops, in cavities, soffits, behind lead flashing, lifted bark, knot holes, tear outs, and frost frees to name a few examples. Some UK bat species have adapted to rely on man-made structures for roosting due to the continued loss of their natural habitats.

Evidence of these species is often concealed and/or inaccessible due to the remote nature of a roost. Where no evidence of roosting bats was recorded, their presence cannot be completely ruled out. Therefore, an assessment for potential roosting features of a structure, as well as the quality/availability or surrounding bat habitat, was conducted. Potential roosting features used by bats can be found in Figure 2. The structure was then assigned a category on a sliding scale of 'negligible' to 'high potential', details of which can be seen in Table 1.

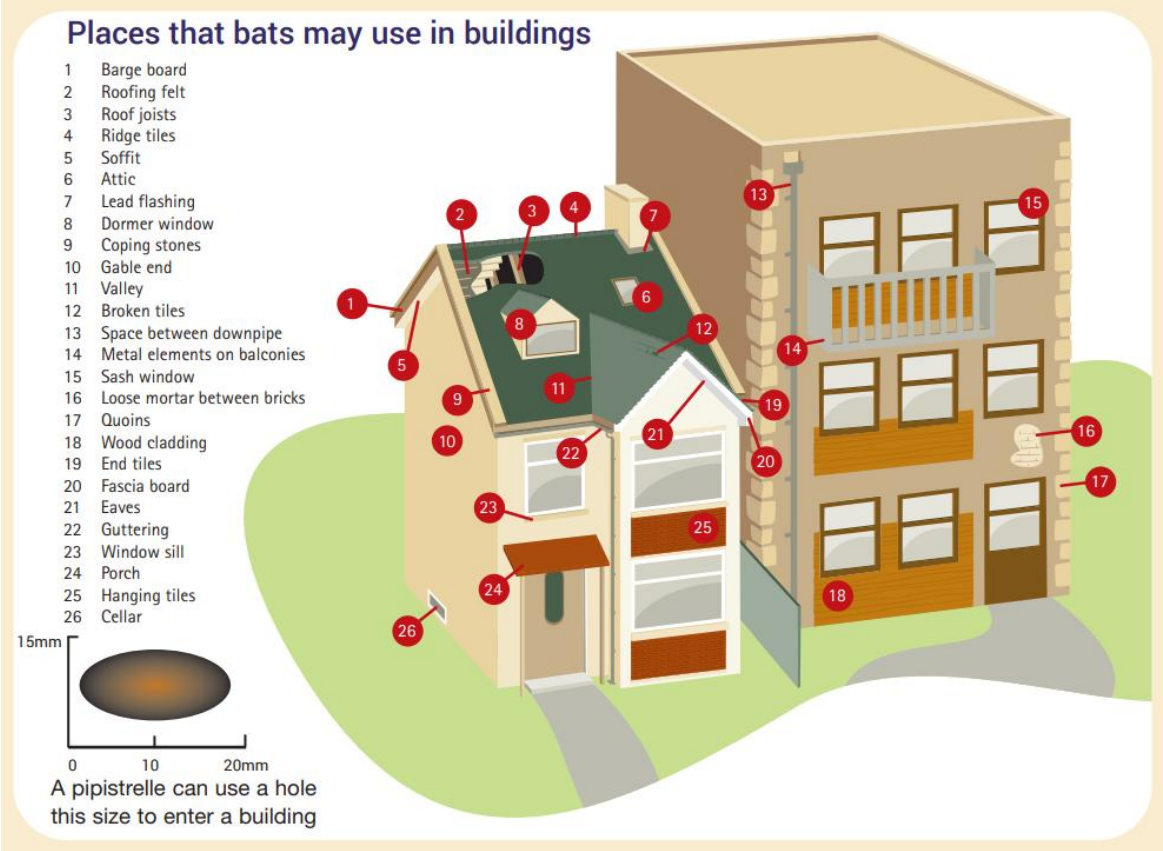


Figure 2 – Diagram demonstrating the potential roosting locations for bats within buildings.
© Bat Conservation Trust, 2025

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Table 1 – explanation of determining bat roosting potential (taken from Collins, 2023)

Bat Roosting Potential	***Description***	
	Roosting habitats in structures	**Potential flight-paths and foraging habitats**
'High potential'	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.
'Moderate potential'	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
'Low potential'	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site but could be used by individual hibernating bats).	Habitats that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
'Negligible potential'	The features of the building/tree are negligible and are highly unlikely to be used by roosting bats.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
'None'	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines or generate/shelter insect populations available to foraging bats).

Table 2 – explanation of determining bat roosting potential of trees (taken from Collins, 2023)

Suitability	***Description***
'Negligible'	The features of the tree are negligible and are highly unlikely to be used by roosting bats.
'PRF-I'	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
'PRF-M'	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

2.3. Survey Limitations

Potential evidence of crevice-dwelling bats may have been missed due to the nature and remote location of potential roosting areas. However, binoculars were used to identify any potential bat droppings on the exterior features of the building, where possible.

The Site visit provides a 'snapshot' of the Site and does not take into account seasonal variation. Species may have been overlooked due to the constraints of the season and time in which the survey was undertaken. A lack of evidence of a species does not confirm its absence, rather there was no indication of its presence at the time of the survey.

The data within this report should not be seen as comprehensive. Data obtained through the desktop study data search is unlikely to provide a complete record of species within the search area. It is therefore possible that a bat species may occur within the vicinity that has not previously been identified within the data search.

There were no limitations in accessing any areas of the building both externally and internally. There were no limitations in gaining access to the ground areas around the bottom of the building to check for droppings or other evidence of bats.

A Local Records Centre (LRC) data search was not undertaken due to the low impact and small-scale nature of the development. The overall impact on biodiversity is likely to be localised and of low significance. It is very unlikely that the development will have any impact outside the footprint of the works. The data search results are considered unlikely to impact the decision-making process, and there is limited potential for key information to have been missed.

3. Results

3.1. Desktop Data Search

The online record search found no Special Areas of Conservation (SACs) designated for bats within 2km of the Site. No information was available regarding European Protected Species licences for bats in the last 10 years, within 2km of the Site (Table 3).

3.2. PRA – Building descriptions

Details of the onsite building that was surveyed for roosting bats are provided in the Table 3. Further images are included within Appendix 3.

Table 5 – Description of all onsite buildings

Building name	Description	Bat roosting potential
2 Penbryn (B1) 	A two-storey stone semi-detached residential property. There were no internal loft spaces. The roof is pitched and gable ended. It is constructed of concrete tiles and there was no external damage recorded during the survey. Several windows had been removed from the building, enabling access to the internal aspect. Internally, the roof voids were composed of wooden rafters and beams presented in moderate condition. Bitumen roofing felt was secured around these. The internal aspect was inspected carefully and all potential cavities and spaces that could typically contain voids were checked thoroughly. These areas were well lit and had a low number of cobwebs. There was a tear in the lining, creating access to the space between the roof lining and roof tiles. There were no signs of bats or roosting birds observed internally or externally.	Low

3.3. Evidence of Bats Recorded

No evidence of roosting bats was recorded within or around the buildings on the Site, following a thorough inspection.

3.3. Evidence of Birds Recorded

No evidence of roosting birds was recorded within or around the buildings on the Site, following a thorough inspection.

3.4. Buildings Assessment – Potential Bat Roosting Areas and Bat Access Points

The building has potential access points due to the removal of the windows. This would provide access to the tear in the lining, and therefore the space between the roof lining and the tiles.

Therefore, the building has been assessed as ‘low potential’ for supporting bats.

The building was assessed and was deemed to hold ‘low potential’ for roosting bats. If there are roosting bats, they would be impacted by the proposals due to the closure of access points.

The interior rooms of the building had high light levels, high traffic and few access points, so is therefore not suitable for roosting bats.

3.5. Trees

There were no trees identified within the Site during the site visit.

4. Biodiversity Mitigation and Enhancement Plan

4.1. Foraging and Commuting Bats

The general surrounding area has high suitability for commuting and foraging bats, due to the Site's proximity to several wooded blocks, the presence of connective features such as hedgerows and lines of trees, the number of open agricultural spaces that could produce high yields of insects, the trees surrounding the site which could offer some foraging opportunities for commuting bats and the proximity of the site to a nearby watercourse.

Artificial lighting can impact local bats as it can impede their ability to forage successfully and can deter bats from commuting across the property. Therefore, to ensure any lighting disturbance on bats is minimised, the following strategy for artificial lighting around the property will be adhered to:

- Where lighting is required for health and safety purposes only, any external lighting required as part of the scheme (e.g. security lighting) will be motion triggered, set on timers (1 minute or less) and directional towards the ground to avoid upward light spill.
- Any light spill must be directed away from the roof and from surrounding tree canopies and vegetation.
- All luminaires used will lack UV elements when manufactured. Metal halide, fluorescent sources will not be used.
- LED luminaires will be used due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
- A warm white spectrum (ideally <2700 Kelvin) must be adopted to reduce blue light component.
- Luminaires must feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats.
- Internal luminaires will be recessed where installed in proximity to windows to reduce glare and light spill.
- The use of specialist bollard or low level downward directional luminaires to reduce upwards lighting spill can be considered, however, should be used as a final resort.
- Column heights should be carefully considered to minimise light spill. Only luminaires with an upward light ratio of 0% and with good optical control must be used.
- Luminaires will always be mounted on the horizontal, i.e., no upward tilt.

4.2. Conclusions on Roosting Bats

A Preliminary Roost Assessment (PRA) of the property was conducted. The building was assessed as having 'low potential' for bat roosting, based on the presence of bat roosting features and potential access points.

Given the identified potential for roosting bats, any bats present may be affected by the proposed works. However, as the roof area will not be directly affected by the proposed works, and the windows providing access to the interior were only recently removed, further surveys are considered disproportionate.

Accordingly, it is recommended that precautionary measures should be implemented during the proposed works.

It must be noted that the PRA provides a current assessment of the bat roosting potential on Site. It is always possible for bat species to ingress at any point in the future, and therefore it is recommended that if 18 months pass and no works have been undertaken, and/or if the condition of the buildings change, an updated PRA is required to assess whether to potential of the buildings to support roosting bats has altered.

Prior to commencement of any works affecting the roof structure, a suitably qualified ecologist will deliver a toolbox talk to all contractors. This will outline the legal protection afforded to bats and their roosts, methods for identifying potential bat presence, and the appropriate protocol to follow should bats be encountered during works.

Roof removal will be undertaken using a soft-strip methodology under the direct supervision of a licensed ecologist. Roof tiles, ridge tiles, soffits, and fascia boards will be removed carefully by hand to minimise noise, vibration, and disturbance. Should a bat be discovered during these operations, all works will cease immediately, and advice will be sought from the supervising ecologist. Works will not recommence until the ecologist confirms it is safe and lawful to proceed, and a European Protected Species licence will be obtained if necessary.

Where possible, works to the roof will be scheduled outside of the main bat maternity season (May to August) and the hibernation period (December to February) to reduce potential disturbance. An appropriate artificial lighting strategy will be implemented in accordance with CIEEM (2025), and Bat Conservation Trust (2023) Guidance Note 08/23: Bats and Artificial Lighting in the UK. External lighting will be designed to avoid light spill onto potential commuting or foraging routes through the use of low-intensity, warm-white lighting, directional fittings, and motion sensors or timers.

As part of the redevelopment, permanent bat roosting features such as integrated bat bricks, tiles or boxes will be incorporated into the new building design to provide long-term ecological enhancement and contribute to local biodiversity net gain. These measures are consistent with best practice guidance and will ensure that the proposed works proceed in accordance with statutory requirements, with minimal risk of harm or disturbance to bats.

4.3. Conclusions on Roosting Birds

No signs of nesting birds were observed during the survey, however the possibility of nesting in the future cannot be entirely ruled out. If works are undertaken during the main breeding season (March to August inclusive), any structures to be affected by the works which have potential for nesting birds should be checked by an ecologist within 48 hours of works commencing. If nesting birds are found, a 5 m exclusion zone should be created around the structure and left in place until the birds have fledged.

Appendix 1 Reference List and Useful Sources

- **Collins, J. (ed.) (2023)** Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London.
- **Reason, P.F. & Wray, S. (2023)** UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Ampfield, CIEEM.
- **HMSO (1981)** Wildlife and Countryside Act 1981 (as amended) [online]. Available at: http://www.legislation.gov.uk/ukpga/1981/69
- **HMSO (2000)** Countryside and Rights of Way Act 2000 [online]. Available at: http://www.legislation.gov.uk/ukpga/2000/37/contents
- **HMSO (2017)** Conservation of Habitats and Species Regulations 2017 [online]. Available at: http://www.legislation.gov.uk/uksi/2017/1012/contents/made
- **Magic database (2024)** http://www.magic.gov.uk/MagicMap.aspx

Appendix 2 Planning Policy & Legislation

National Planning Policy Framework 2026

The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2026) sets out the government's planning policies for England and how these are expected to be applied. The NPPF states that 'planning policies and decisions should contribute to and enhance the natural and local environment by:

- Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils in a manner commensurate with their statutory status or identified quality in the development plan.
- Recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.
- Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions, such as air and water quality, taking into account relevant information such as river basin management plans.

A list of principles which local planning authorities should follow when determining planning applications is included in the NPPF which includes the following:

- If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
- Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Species Scientific Interest.
- Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

The Wildlife and Countryside Act (WCA) 1981

The WCA is the primary piece of legislation relating to nature conservation in Great Britain. The Act is supplemented by provisions in the CRoW Act 2000 and the NERC Act 2006. All species of bat are protected under Schedule 5 of the WCA which makes it a criminal offence to kill or take by certain methods a bat, obstruct access to any structure or place with which a bat uses for shelter or protection, or disturb a bat while occupying a structure. Additionally, certain prohibited actions under the WCA may be undertaken under licence by the proper authority.

The WCA also protects the disturbance, damage or destruction of any wild bird nests and their eggs. Schedule 1 of the Act contains a list of birds which are conferred extra protection and for which all offences carry harsher penalties. Under the legislation it is illegal to: intentionally or recklessly disturb a Schedule 1 bird while it is building a nest or is in or near a nest containing eggs or young; and intentionally or recklessly disturb dependent young of such a bird.

The Conservation of Habitats and Species Regulations 2017

All British bats are classed as European Protected Species and therefore receive protection under the Conservation of Habitats and Species Regulations 2017 (as amended), making it an offence inter alia to:

- Deliberately kill, injure or capture a bat;
- Deliberately disturb bats;
- Damage or destroy a breeding site or resting place of a bat.

The Countryside and Rights of Way (CRoW) Act 2000

The CRoW Act applies only to England and Wales, and importantly adds the word “reckless” to the offence of damaging or destroying a place a bat uses for shelter or rest or disturbing a bat while using a roost.

Appendix 3 Additional Photographs



Photograph 1 – The rear aspect of the property



Photograph 2 – The side aspect of the property

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Photographs 3 & 4 – The internal aspect of the property



Photograph 5 – A tear in the lining on the internal aspect of the property, as indicated by a red circle.