Former Working Men's Club, Flint Mitigation and Conservation Plan

Report Reference: EE.5074.26.CP.LB
Author contact information: lucy@enfysecology.co.uk

Date	Author	Project Number	Approved by	Version	Comments
06/07/2026	Lucy Boyett	5074	Keymar Wake	1	

Contents

1.0 Introduction

1.1 Enfys Ecology Limited was commissioned by Wales & West Housing Association to prepare this Mitigation and Conservation Plan, to support the proposed redevelopment of the Former Working Men's Club, Woodfield Avenue, Flint, CH6 5JQ. The plan sets out the ecological mitigation, compensation and enhancement measures required to avoid or minimise impacts on protected and notable habitats and species.

1.2 This plan has been informed by the findings of the Preliminary Ecological Appraisal (PEA) undertaken by Enfys Ecology in 2025 (Wynn, 2025).

1.3 The small site is located within a residential area of Flint and comprises areas of hardstanding, bare ground and species-poor improved grassland bounded by native and non-native hedgerows with scattered bramble scrub.

1.4 The principal ecological features of the site are the native hawthorn and elder hedgerows along the south-western and north-western boundaries, which provide habitat and connectivity for birds, bats, invertebrates and small mammals. The Leyland cypress hedge on the eastern boundary, although non-native, also functions as a valuable linear feature and provides suitable habitat for nesting birds. Areas of bramble scrub provide additional habitat for nesting birds and other wildlife. The remaining habitats within the site are of relatively low ecological value.

1.5 The proposed development comprises the construction of a 22-unit residential apartment block, together with a new access road, parking for 22 vehicles and associated landscaping. A large section of the south-western boundary hedgerow will be retained, while the north-western hedgerow, Leyland cypress hedge and scrub will be removed to facilitate the development.

1.6 To minimise ecological impacts, the mitigation, compensation and enhancement measures detailed within this plan will be implemented throughout the works. In accordance with Planning Policy Wales and the Environment (Wales) Act 2016, these measures have also been designed to contribute towards maintaining and enhancing biodiversity and delivering a net benefit for biodiversity.

2.0 The Step-Wise Approach

2.1 *Proposed Works*

2.1.1 The proposed development comprises the construction of a residential apartment block containing 22 residential units, together with a parking area providing 22 parking spaces.

2.1.2 A large section of the native hawthorn and elder hedgerow along the south-western boundary will be retained as part of the development. The hawthorn and elder hedgerow along the north-western boundary, together with the Leyland cypress hedge on the north-eastern boundary, will be removed to facilitate the proposed works.

2.2 *The Step-Wise Approach*

2.2.1 Development proposals should take green infrastructure into consideration in order to avoid negative impacts on habitats and species and seek ways to maintain and enhance biodiversity. Impacts on habitats and species should be treated in a step-wise manner (Planning Policy Wales PPW12), by seeking to:

- **Avoid** damage to biodiversity in its widest sense by maintaining the largest possible area of existing habitat supporting biodiversity and functioning ecosystems, particularly Section 7 habitats and species where present, through careful development design and consideration of long-term maintenance and management and ensuring that retained habitats continue to be well connected to adjacent habitats to provide connectivity for key species.

- **Mitigate** or **restore** by identifying measures to address the specific negative effects by repairing damaged habitats and disturbed species. The measures should seek to restore in excess of like for like, accounting for disturbance and time lags for the recovery of habitat and species, and in every case, mitigation or restoration measures should seek to build ecosystem resilience within the site and where possible the wider area.

- As a last resort, off-site **compensation** for unavoidable damage must be provided. This must be of significant magnitude to fully compensate for any loss.

- All development must **deliver a net benefit** for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed).

3.0 Avoidance and Mitigation

3.1 *Avoidance*

3.1.1 The native hawthorn and elder hedgerow is a principal ecological feature of the site and is considered a Habitat of Principal Importance. Consequently, impacts to this habitat should be minimised wherever practicable, with as much of the existing hedgerow retained as possible. The remaining habitats are of comparatively lower ecological value. Although the Leyland cypress hedge and bramble scrub provide habitat for nesting birds and other wildlife, their loss would not represent a significant ecological impact provided that the mitigation and compensation measures set out in this plan are implemented.

3.1.2 To facilitate the proposed development, the hawthorn and elder hedgerow along the north-western boundary, together with the Leyland cypress hedge and scrub vegetation, will be removed. The remaining hawthorn and elder hedgerow along the south-western boundary will be retained and protected throughout the construction works.

3.1.3 With respect to the potential impact to bats from lighting associated with development schemes, the Institute of Lighting Professionals (2023) 'Bats and Artificial Lighting at Night' guidance suggests that the ecological mitigation hierarchy applies to lighting design: Impacts to biodiversity should be avoided in the first instance through design and where this has been clearly demonstrated not to be possible, appropriate mitigation needs to be put in place. Compensation is the least desirable option, so all other avenues should first be explored and ruled out. In parallel, opportunities to design lighting betterment for biodiversity should be sought wherever possible.

3.1.4 It is therefore important to integrate avoidance measures into developmental design, by retaining ecologically functional 'darker corridors' within schemes wherever feasible, and in preference to seeking lighting mitigation strategies. Consideration should be given to the lighting effect of a scheme on Key Habitat and Supporting Habitat areas for bats, as well as commuting routes.

3.1.5 It is therefore recommended that as much of the south-western hedgerow as possible is maintained as a darker zone, with limited artificial light spillage. Light spill on the hedgerow should be minimised and this should be reflected in the appropriate plans for the site.

3.1.6 General biosecurity measures which should be adopted as part of any development project are provided in Appendix C.

3.2 *Mitigation*

3.2.1 This section sets out the mitigation measures which will be adopted as part of the project to minimise potential impacts on biodiversity features. The following general mitigation or Reasonable Avoidance Measures (RAMS) should be adopted at all times during the works:

- Working areas should be kept to the minimum required.
- Works should be avoided within 1 hour of dawn and dusk where possible, in order to avoid disturbance to nocturnal animals. If works during this time are needed, all lighting should be directional and directed away from boundary edges and any surrounding habitat.
- Storage of fuel must follow best practice. Potential pollutants should be restricted to site compounds and hardstanding areas. Spill kits should be readily available throughout the works.
- Should it be necessary to have any excavations left open overnight a suitable ramp (such as a plank or branch) must be provided to allow badgers and other animals to escape the pit. Ramps could be created by grading the slope at the edges or using scaffold boards.
- All materials brought onto site should be stored on hard standing where possible. Materials should be stored on raised pallets or bagged, to prevent amphibians (or other wildlife) from taking refuge beneath them.
- Any terrestrial mammals seen must be allowed to leave the area on their own. If this is not possible e.g. the animal is injured or trapped then an ecologist must be called.
- If at any point in the works an amphibian or reptile is found within the works area all works in the vicinity of the sighting must immediately cease. Common amphibians should be moved from the working area by site workers (wearing gloves) and placed in a nearby hedgerow. Reptiles will usually retreat to a safe area of their own accord. If, at any point, GCN are discovered during the works then works will have to stop and a licence may be required from NRW before they can continue.

3.2.2 The following mitigation measures should be adopted during the construction-phase in order to minimise any potential impacts on habitats or species.

- ***Retained habitats*** - Appropriate protection fencing should be used during the construction period to ensure that there is no access to, or risk of damage to the Root Protection Areas (RPAs) of the retained hedgerow.

- ***Amphibians, reptiles and hedgehogs*** - Care must be taken regarding clearance of the hedgerows, any piles of brushwood, rubble, plant material or other 'habitat piles' in the colder months due to the possibility of disturbing hibernating animals including hedgehogs, amphibians and reptiles. Such piles should not be disturbed between November and April or when daytime temperatures are below 10°C.

- ***Bats*** - After avoiding, wherever possible, the potential impacts of Artificial Lighting At Night (ALAN) through scheme designs, if further mitigation measures are required in the form of lighting controls, ILP (2023) recommend that a lighting professional helps to select those light sources, lamps, LEDs and their fittings which are most appropriate for the project. Further details regarding lighting designs from ILP (2023) are given in Appendix B. The following overarching mitigation measures are recommended: Careful choices would need to be made about the type of lighting chosen for a scheme, and this should be designed through a multi-disciplinary design approach. Whilst Part Night Lighting (PNL) schemes and the installation of LED lights may have energy-saving benefits, they can result in an increase in light intensity, impacting on bat behaviours, and the lighting design for each site should be developed using information from bat surveys, and pre-development light level data.

- ***Nesting birds*** – All vegetation clearance during the nesting season (March-September inclusive) may impact nesting birds, and so further survey may be required in order to establish if nests are present. Therefore, it is recommended that as far as possible all vegetation clearance takes place outside these months. If this is not possible, all vegetation to be cleared MUST be thoroughly checked for nests, immediately prior to the works; if any active nests are present all works in the vicinity must cease until all chicks have fledged.

4.0 Compensation and Enhancement

4.1 This section identifies the habitats and species requiring compensation as a result of the proposed development and sets out the recommended compensation and enhancement measures to be incorporated into the scheme design. It also includes measures to enhance the ecological value of the site, helping to deliver a net benefit for biodiversity.

4.2.1 **Habitats**

4.2.1 It is recommended that the loss of hedgerow is compensated for by supplementary native species planting of the retained hedgerow along the south-western site boundary, to fill in any gaps and improve connectivity for wildlife. Planting can take place over a five-year period with tree stakes and rabbit guards used.

4.2.2 To compensate for the loss of hedgerow and scrub vegetation, new hedgerows will be planted, including 40m of native mixed species hedgerow along the north-eastern site boundary and a further 13m along the south-western boundary. Species will include hazel, hawthorn, honeysuckle, holly, blackthorn, dog rose, guilder rose and elder, as specified in the Planting Schedule and will be planted and managed following the Outline Planting Specification.

4.2.2 There will also be 15m of single species ornamental hedges/shrubs planted along the northern boundary and at the entrance to the building.

4.2.3 There will be small areas of ornamental planting across the site and native tree planting including hawthorn, rowen and downy birch as detailed in the Planting Schedule and Outline Planting Specification.

4.2.4 Small amounts of buddleia, a non-native invasive species, were recorded within the southern part of the site. Although considered invasive, buddleia is not listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), as it is now widely naturalised in the UK. Recommended measures for managing and removing this species during the works are provided in the Biosecurity Risk Assessment (Table 4.1), with general site biosecurity measures detailed in Appendix B.

Table 4.1: Biosecurity Risk Assessment

Species	Potential contamination route	Likelihood of risk	Operational Procedure	Controlled Waste
Buddleia	Spread of species via construction machinery/movement of soil. Introduction of seeds via contaminated soil.	Low risk if there are no known requirements to import soil. Moderate if heavy plant is used on site and may spread the existing species present.	Ensure contractors know how to recognise the species. The plants should be cut back to the stump and the cuttings should be disposed of by burning. Stumps should be either dug up and disposed of, or injected with herbicide immediately after being cut. Young plants should be pulled by hand.	No

4.3 *Swifts*

4.3.1 A number of swift records were identified within 1 km of the site. To provide suitable nesting opportunities, four double cavity integrated swift boxes should be installed on the north-western elevation of the apartment block and should be positioned beneath the eaves at a minimum height of 5m. To maximise the likelihood of occupation, the boxes should incorporate an internal egg cup and have a clear flight path to the entrance. See Figure 4.1 showing the recommended positioning of integrated swift boxes. Examples of suitable integrated swift boxes include:

- Green & Blue Swift Block
- Schwegler Swift Box
- Habibat Swift Box

4.4 **Nesting birds**

4.4.1 To enhance the site for other general birds, four bird boxes will be in-built on the north-western and south western elevations. These should be positioned away from doors, windows and vents to prevent disturbance. See Figure 4.1 showing the recommended positioning of these bird boxes. Examples of recommended integrated bird boxes include:

- Green & Blue Bird Block/Nest box
- Schwegler Brick box type 24
- Habibat 003 Bird Nest Box

4.5 *Bats*

4.5.1 Six integrated bat boxes will be incorporated into the south-western elevation of the building adjacent to the retained hedgerow, at a minimum height of 4m above ground level. The final locations should be agreed with an experienced ecologist to ensure they are positioned where disturbance from artificial lighting, windows, doors and patios is minimised. See Figure 4.1 showing the recommended positioning of these bat boxes. Examples of recommended integrated bat boxes include:

- Green & Blue Bat Block/Bat Brick for crevice dwelling bats
- Schwegler 1FR
- Habibat Bat Box

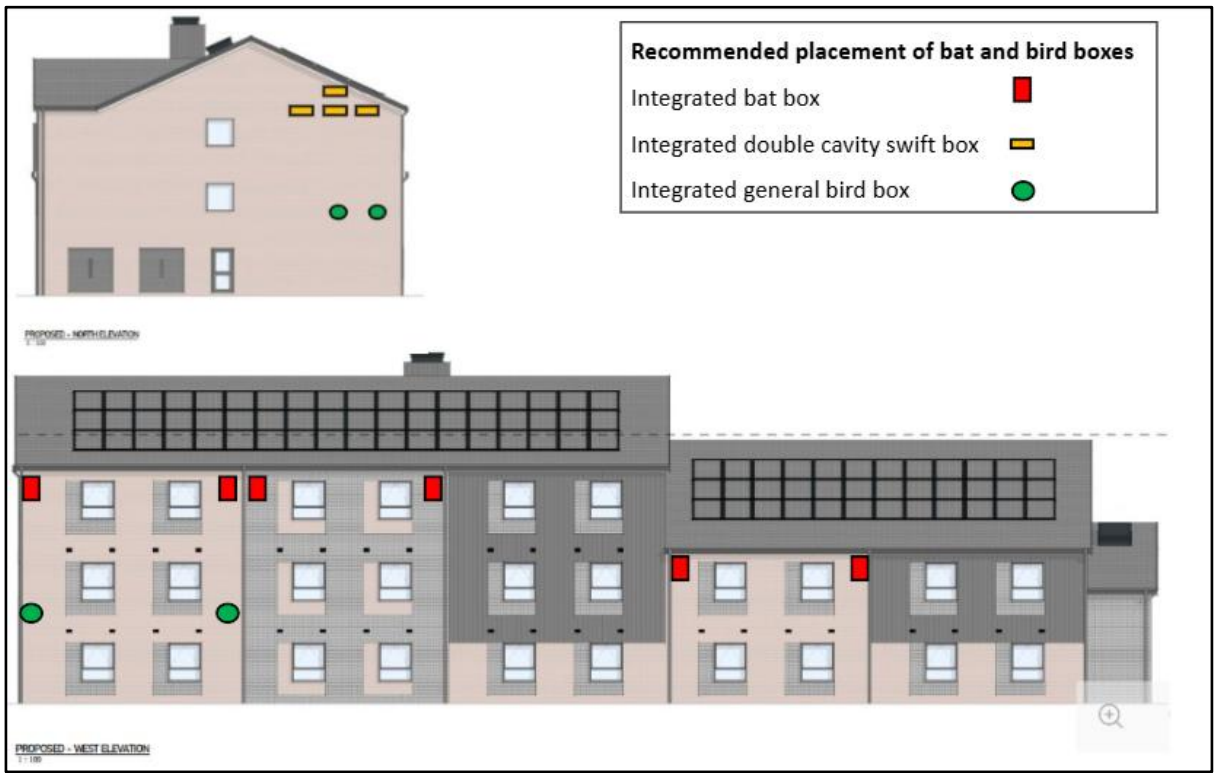

Figure 4.1 Recommended positioning of bat and bird boxes on the south-western and north-western elevations. ©Hughes O'Hanlon architects (Drawing No. WAF-HOH-XX-XX-DR-A-4200 RevP12)

4.6 *Summary*

4.6.1 Planning Policy Wales (PPW12, paragraph 6.4.5) confirms that 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.

4.6.2 Based on the development proposals provided to Enfys Ecology at this stage in the design process, the following recommendations in relation to providing a net benefit for biodiversity as a result of the proposed development include:

- Planting up the existing hawthorn and elder hedgerow on the south-western boundary with native tree species.
- Planting of a new native species hedges along the north-eastern boundary
- Planting of native trees and shrubs across the site
- Installation of bat and bird boxes to support local bird and bat populations

4.7 *Ongoing Maintenance*

4.7.1 It is vital that the habitat features, once created, are maintained and managed appropriately to preserve ecological features, and add biodiversity value. Appropriate agreements must be in place to secure the ongoing management of the site, with appropriate management practices in place (e.g. the hedgerows must be maintained in a wildlife friendly manner, and cut back only as appropriate), otherwise any gains made from the scheme will be lost over time.

5.0 Further Works

5.1 No further survey work will be required on site in order for the site to proceed to planning.

5.2 Table 5.1 below provides a summary of ecological considerations associated with the proposed development.

Table 5.1: Summary of Ecological Considerations

Constraint	Work Stage	Species	Work	Location	When possible
Buddleia	All	Buddleia	Plan and remove	Southern area on improved grassland and near western hedgerow	Best done October-March
Any vegetation clearance in March – September	Immediately prior to clearance, whenever this occurs	Nesting birds	Nesting bird checks (see Section 3.2.2).	Any scrub, tree, or tall vegetation clearance	March-September
Vegetation/ hedgerow/brash pile removal	Immediately prior to clearance, whenever this occurs	Amphibians/ Hedgehogs/ reptiles	To be undertaken at an appropriate time of the year and weather conditions.	Whole site	Between April - October or when daytime temperatures are below 10°C.

6.0 References

CIEEM. (2017a). *Guidelines for Preliminary Ecological Appraisal*, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM. (2017b). *Guidelines for Ecological Report Writing*, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM. (2019). 'Advice Note on the Lifespan of Ecological Reports and Surveys'. Chartered Institute of Ecology and Environmental Management, Winchester.

JNCC. (2010). *Handbook for Phase 1 Habitat Survey: a technique for environmental audit.* JNCC, Peterborough.

ILP. (2023). *Bats and Artificial Lighting At Night*. Guidance Note GN08/23. Institute of Lighting Professionals & Bat Conservation Trust.

ILP. (2021). 'Guidance Note 1 for the reduction of obtrusive light. Available: https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/

Wynn (2025) EE.5074.25.JWV2 *Former Working Mens Club, Flint Preliminary Ecological Appraisal* Enfys Ecology.

Appendix A Legislation

Bats

The Wildlife and Countryside Act (WCA) 1981 (as amended) forms the key legislation protecting habitats and species in the UK. All UK bat species are fully protected under the 1981 Act through inclusion on schedule 5. All bats are also listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2017 which transcribes the EC Habitats Directive into UK law. In combination, this legislation makes it an offence to:

- Deliberately or recklessly take, injure or kill a bat;
- Deliberately or recklessly damage or destroy a place or structure used by bats for shelter or protection;
- Deliberately or recklessly obstruct access to a bat roost; or
- Deliberately or recklessly disturb bats while occupying a roost.

Bat roosts are protected under these laws whether the animals are present at the time of survey or not. Under both laws the Welsh Government and D.E.F.R.A. are empowered to

issue licences to carry out work to bat roosts for reasons of overriding public interest. It is not illegal to tend to a disabled bat pending recovery.

Birds

Under the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000, all wild birds, their nests and eggs are protected during the breeding season (typically March to August inclusive). This makes it an offence to:

- Intentionally kill, injury or take any wild bird.
- Take, damage or destroy the nest of a wild bird included in Schedule ZA1.
- Take, damage or destroy the nest of any wild bird while that nest is in use or being built.
- Take or destroy an egg of any wild bird.

Biodiversity Net Gain – Relevant sections of legislation

Section 6 of the Environment (Wales) Act 2016:

Biodiversity and resilience of ecosystems duty
(1) 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) In complying with subsection (1), a public authority must take account of the resilience of ecosystems, in particular the following aspects—

(a) diversity between and within ecosystems;

(b) the connections between and within ecosystems;

(c) the scale of ecosystems;

(d) the condition of ecosystems (including their structure and functioning);

(e) the adaptability of ecosystems.

…. (5) In complying with subsection (1), a public authority other than a Minister of the Crown or government department must have regard to—

(a)the list published under section 7;

- Section 7 of the Environment (Wales) Act 2016:

Biodiversity lists and duty to take steps to maintain and enhance biodiversity

(1) The Welsh Ministers must prepare and publish a list of the living organisms and types of habitat which in their opinion are of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales.

(2) Before publishing a list under this section the Welsh Ministers must consult the Natural Resources Body for Wales ("NRW") as to the living organisms or types of habitat to be included in the list.

(3) Without prejudice to section 6, the Welsh Ministers must—

(a) take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section, and

(b) encourage others to take such steps.

Appendix B Further Lighting Guidance

After avoiding, wherever possible, the potential impacts of Artificial Lighting At Night (ALAN) through scheme designs, if further mitigation measures are required in the form of lighting controls, ILP (2023) recommend that a lighting professional helps to select those light sources, lamps, LEDs and their fittings which are most appropriate for the project. To assist with the decision-making process, ILP (2023) suggest that the following are considered when choosing luminaires:

- All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used.
- LED luminaires should be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
- A warm white light source (2700Kelvin or lower) should be adopted to reduce blue light component.
- Light sources should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone et al, 2012).
- Internal luminaires can be recessed (as opposed to using a pendant fitting) where installed in proximity to windows to reduce glare and light spill.
- Waymarking inground markers (low output with cowls or similar to minimise upward light spill) to delineate path edges.

- Column heights should be carefully considered to minimise light spill and glare visibility. This should be balanced with the potential for increased numbers of columns and upward light reflectance as with bollards.

- Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be considered - see ILP (2021) GN01.

- Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt.

- Where appropriate, external security lighting should be set on motion sensors and set to as short a possible a timer as the risk assessment will allow. For most general residential purposes, a 1 or 2 minute timer is likely to be appropriate.

- The use of bollard or low-level downward-directional luminaires is strongly discouraged. This is due to a considerable range of issues, such as unacceptable glare, poor illumination efficiency, unacceptable upward light output, increased upward light scatter from surfaces and poor facial recognition which makes them unsuitable for most sites. Therefore, they should only be considered in specific cases where the lighting professional and project manager are able to resolve these issues.

- Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed. However, due to the lensing and fine cut-off control of the beam inherent in modern LED luminaires, the effect of cowls and baffles is often far less than anticipated and so should not be relied upon solely.

Appendix C General Biosecurity Measures

Biosecurity means taking measures to ensure that good practices are in place to minimise the risk of importing and spreading invasive non-native species (INNS), pests and infectious disease. As non-native species or diseases could be transmitted in any water or material, a good biosecurity routine is essential, even if invasive non-native species are not apparent.

General good-practice biosecurity measures include:

- A toolbox talk detailing the general risks of invasive non-native species (INNS) relevant to the site and the project should be delivered to all workers, showing the various life stages and how to recognise these plants and animals.

- A cleaning station should be set up at the site exits including facilities to wash boots and vehicles.

- **All** footwear of staff leaving site (for **any** reason and no matter for how short a time) should be cleaned (i.e., visually free of soil and debris) before leaving site.

- Soil and vegetation should be washed off with clean water (and brushes). Water (which should not be contaminated with any disinfectant or other pollutants) should then be disposed of by pouring on site to soak away. No water should be disposed of directly into a watercourse.

- The wheels or tracks (and any other part which has come into contact with the soil) of all vehicles which have entered the area must be thoroughly washed and be free of soil and debris before leaving the site.

- No one should remove any soil or vegetation from the working area for any reason.

It may be necessary to produce a site-specific and project-specific Biosecurity Risk Assessment to support the construction-phase of the project, once detailed design works have been completed and timings and construction methods are known. This Biosecurity Risk Assessment should identify the specific biosecurity risks associated with the works and detail operational procedures to minimise the risk of spreading invasive non-native species (INNS) and other biosecurity risks.