Flint Street North Highways Offices, Huddersfield

Bat Survey Report

8th June 2023

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Document ref: MBE/BAT/2023/023/02				
Purpose and Description	Originated	Checked	Reviewed	Date
For Planning	R Bell MCIEEM	G Slack MCIEEM	R Bell MCIEEM	08/06/2023

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1. Summary

1.1.1 Middleton Bell Ecology Ltd were commissioned on 14th April 2023 by Ilyas Ramjan of Kirklees Council to produce a Preliminary Roost Assessment and to undertake required further nocturnal surveys in relation to Flint Street Highways Offices.

1.1.2 The survey was undertaken to inform proposals to demolish existing site buildings.

1.1.3 Bat survey works detailed in this report included a desk-based study, an internal and external visual inspection and a single complete nocturnal survey of site buildings requiring further survey. A second targeted nocturnal survey of moderate bat roost suitability buildings and already identified roost sites is booked in for 15th June 2023.

1.1.4 A single historic grounded bat record (2004) was collected from the site. No signs of bat presence were recorded from any of the surveyed buildings.

1.1.5 Buildings 2 and 10 were considered to display a moderate level of bat roost suitability, with Buildings 1, 3, 4, 5, 8 & 9 considered to display a low overall level of bat roost suitability. Sections of Building 5, and all sections of Buildings 6 & 7 were considered to display a negligible level of bat roost suitability.

1.1.6 A total of two common pipistrelle day roost locations have been recorded from the site with both roosts recorded from the south elevation of Building 5. The two common pipistrelle day roosts recorded are considered to be of low conservation importance (Mitchell Jones, 2004). The presence of a maternity roost/s is considered highly unlikely. Pipistrelle bats use a very wide variety of roost features over the winter period and as a result it is possible species of this genus would make some use of site buildings over winter, however, the site lacks any particular appeal for hibernating pipistrelle.

1.1.7 The proposed demolition works will result in the destruction of the roosts and consequently the site will either need to be registered on the bat mitigation class or earned recognition licence, or an European protected species mitigation licence will need to be obtained for the scheme. A licence can only be applied for following the grant of demolition consent and the discharge of any nature conservation related planning conditions (which can be discharged prior to commencement). Proposed roost mitigation is to comprise new externally mounted bat boxes, to be installed either on retained buildings to the south of Flint Street, or on new telegraph poles which would need to be installed at the northern end of the surveyed site.

1.1.8 The survey findings are considered to be valid for a period of 12 months, after which an update survey is likely to be required.

2. Introduction

2.1.1 Middleton Bell Ecology Ltd were commissioned on 14th April 2023 by Ilyas Ramjan of Kirklees Council to produce a Preliminary Roost Assessment and to undertake required further nocturnal surveys in relation to Flint Street Highways Offices.

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2.1.4 The Highways Offices were located to the north of Flint Street, at the junction with Alder Street in Huddersfield, approximately 1.5 km north of the town centre.

3. Habitat Assessment

3.1.1 The site was located in an area of industrial and commercial development. A mainly tree-lined footpath, comprising the former Huddersfield Branch Line, bordered the site at its northwest boundary. This linear feature comprised the principal potential bat foraging habitat and connective commuting feature in the local area. A small enclosed courtyard within the building complex, at the southwest end of the site, also supported tree and shrub vegetation as well as a small area of lawn, offering some limited appeal to foraging bats. The vast majority of the site itself comprised either buildings or hardstanding, with these habitats considered to offer negligible appeal to foraging bats. It was considered likely that flood lighting present in the car parking areas, as well as street lighting on Flint Street and Alder Street, would further compromise the appeal of the site to bats.

3.1.2 The range of species expected to use the local area for roosting was expected to be quite low, with the density of bats using the local area also expected to be low. Table 1 summarises the habitats present, adjacent to and further afield of the surveyed building.

Table 1. Location and habitat table

Name and address: Highways Offices, Flint Street, Huddersfield, HD1 6LG			
OS Grid Ref. SE 14674 18244		Altitude. 80 m	
Local Planning Authority: Kirklees Council			
Features on site and adjacent to site			
Feature	On site	Adjacent	Comments
Buildings	✔	✔	Located adjacent to other industrial and commercial premises
River bordered by trees			Huddersfield Narrow Canal c. 350 m southeast, River Colne c. 800 m southeast
Standing water			
Bridges tunnels and culverts		✔	Bridge across footpath/former rail line (Huddersfield Branch Line) – 30 m northeast of site

Name and address: Highways Offices, Flint Street, Huddersfield, HD1 6LG			
Trees		✔	Trees bordering footpath at northwest edge of site
Woodland			Woodland block beside active railway, c. 220 m southeast of site
Grassland	✔	✔	Small areas of lawn within courtyard/enclosed space in southwest corner of site

Figure 1. Site location, as indicated by red circle

3.2 Aims

3.2.1 The survey was conducted to help determine the following:

- The presence/likely absence of roosting bats.
- Suitable bat roosting areas and access/egress points into the buildings.
- The level of bat roost potential associated with the buildings.
- The number and species of bat roosting within the buildings.
- Identify further bat survey work or mitigation requirements.
- Record evidence of bird nesting from site buildings.

4. Methodology

4.1 Data Consultation

4.1.1 A records request was undertaken both West Yorkshire Ecology Service (WYES) and West Yorkshire Bat Group (WYBG), with records requested for locations within 2 km of the site.

4.1.2 A search of the Multi-Agency Geographical Information for the Countryside (MAGIC) website was undertaken to identify historic European Protected Species (EPS) licences obtained for locations within 2km of the site.

4.2 Field Survey

Preliminary Roost Assessment

4.2.1 The following personnel conducted the preliminary roost assessment on 3rd May 2023:

- Robert Bell (MCIEEM; Class license WML-A34-Level 4, 2016-25236-CLS-CLS)
- Amanda Murphy (Qual CIEEM; Bat Survey Class licence WML-A34-Level 2, 2020-47913-CLS-CLS)

4.2.2 The following activities were carried out during the surveys in compliance with relevant Bat Survey Guidelines (Collins 2016):

- A brief inspection and assessment of the site and habitats present to within 300 m.
- An extensive examination of all parts of the buildings both inside and out to record structural features and condition and to record features that may be suitable for roosting bats. Particular attention was paid to any crevices or gaps in walls, lintels, gaps between beams and joists and to the possibility of finding droppings stuck to walls, floors or other surfaces, or insect remains below beams, among a number of other factors. All signs indicative of the presence of a bat roost, including live or dead bats, droppings, feeding remains, scratch marks and staining were recorded.
- An assessment of the buildings' bat roost potential (negligible, low, moderate, high or confirmed roost).

4.2.3 In addition:

- Recording of any signs of nesting bird usage of the buildings.

4.2.4 The following equipment was used or at hand during the survey:

- Clulight
- Binoculars
- Endoscope
- Ladders
- Camera

Nocturnal Surveys

4.2.5 The following personnel conducted the nocturnal surveys:

- Robert Bell (RB)
- Amanda Murphy (AM)
- John Pearse (JP)
- Ian Wright (IW) (Bat Survey Class licence WML-A34-Level 2, 2023-11218-CLS-CLS).
- Daniel Wildsmith (DW) (MCIEEM; Class licence WML-A34-Level 2, 2019-42895-CLS-CLS)
- Greg Slack (GS) (MCIEEM; Class licence WML-A34-Level 4, 2017-28068-CLS-CLS)
- Carl Dixon (CD)
- Daniel Cunningham

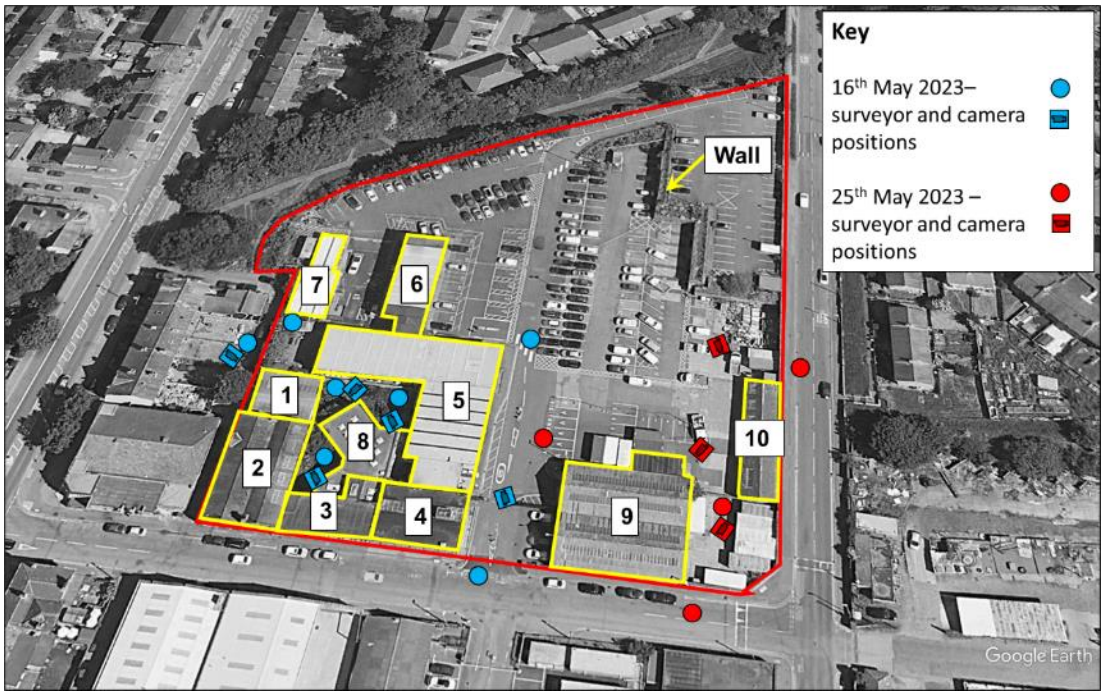
4.2.6 Given the extent of the site, the first nocturnal survey visit was split across two separate survey nights in May 2023.

4.2.7 The following activities were carried out in compliance with relevant Bat Survey Guidelines (Collins 2016).

- Dusk emergence survey on 16th May 2023 – Seven surveyors (RB, AM, JP, IW, DW, GS, CD) – Covered Buildings 1, 2, 3, 4, 5 & 8
- Dusk emergence survey on 25th May 2023 – four surveyors (AM, IW, DC, JP) – Covered Buildings 9 &10

4.2.8 Surveyor positions are shown on Figure 2. All surveyors were equipped with Wildlife Acoustics EM Touch bat detectors and iPad/iPod recorders. Where safe to deploy (away from street locations) infra-red lit video cameras were also used with these comprising ether Canon XA10 or Panasonic VX980 infra-red video cameras. All areas of the buildings being surveyed were observed by surveyors, but cameras were sometimes positioned away from the surveyors to enable complementary building coverage.

Figure 2. Building numbering and surveyor location plan



4.2.9 The dusk emergence surveys continued from 15 minutes prior to sunset until 1.5 hours after this time.

4.3 Survey Limitations

4.3.1 A single roof void (Building 1, Figure 2) was not able to be accessed for inspection. This was not considered a significant limitation as no signs of bats were recorded from other inspected roof voids on the site and no use was recorded of any roof voids during nocturnal surveys. In addition, the relevant building was of a relatively modern design and situated in a location where the presence of void roosting bats (i.e. brown long-eared bat *Plecotus auritus*), would be considered unlikely.

4.3.2 Video cameras were not used during nocturnal surveys in survey positions on Flint Street or Alder Street due to the risk of theft in these highly public locations. The lack of video cameras to assist with surveyor observations in these positions was not considered a major limitation due to the general lack of bat activity in these areas and clear views of the survey building afforded from the relevant survey positions.

5. Results

5.1 Data Consultation

5.1.1 A total of 110 bat records was received from WYES. A single record was obtained from the site itself, with a grounded bat of an unidentified species collected from the Highways Offices in 2004. The closest roost record related to a 2003 observation of an unidentified bat species roost, observed in a location c.890 m from the site. Species positively identified in the records included common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared bat, whiskered bat *Myotis mystacinus*, Daubenton's bat *Myotis daubentonii*, noctule *Nyctalus noctula* and Leisler's bat *Nyctalus leisleri*. Other records related to either an unidentified pipistrelle species or an unidentified bat species. The distribution of bat records received from WYES can be seen in Appendix 1.

5.1.2 A total of 40 bat records were received from WYBG. The grounded bat record (collected from the Highways Offices), also supplied by WYES, comprised the only record collected from the site itself. Bat species positively identified in the records comprised common pipistrelle, whiskered bat, noctule and Leisler's bat. Other records related to either an unidentified pipistrelle species or an unidentified bat species.

5.1.3 A search of MAGIC highlighted a single bat EPS mitigation licences having historically been issued for a location within 2 km of the site. This licence was issued in 2014 to permit destruction of a common pipistrelle resting place in a location c.1.8 km south of the site.

5.2 Preliminary Roost Assessment

5.2.1 For the purpose of aiding description, the surveyed buildings have been numbered as shown in Figure 2.

5.2.2 No evidence of bat roosting was recorded from the buildings. Buildings 2 and 10 were considered to display a moderate level of bat roost suitability, with Buildings 1, 3, 4, 5, 8 & 9 considered to display an overall low level of bat roost suitability. Sections of Building 5, and all sections of Buildings 6 & 7 were considered to display a negligible level of bat roost suitability.

Building 1

Description and external bat roost potential

5.2.3 Building 1 comprised a single-storey brick-built building/offices with a dual-pitched corrugated asbestos-cement sheet covered roof with an asbestos/cement ridge and metal verge capping (Plates 1 & 2). Windows comprised a mix of plastic and metal framed single and double-glazed units.

5.2.4 Potential roosting features on the exterior of B1 included gaps beneath verge capping at the gable apexes, with occasional open joints on the west elevation.

Internal inspection

5.2.5 A suspended ceiling was present and access into the roof space above was not possible. On the basis of construction of other similar aged buildings on the site (i.e.

B9) it was expected that the roof would be unlined and suspended on steel trusses and purlins.

5.2.6 Building 1 was considered to display a low level of bat roost suitability

Plate 1. East gable of B1

Plate 2. East elevations of B1 & B2

Plate 3. Southwest corner of B2, with south elevations of B3 & B4 to right of image

Plate 4. Example of open joints in B2

Plate 5. Section of roof space at southwest corner of B2

Plate 6. Partly vaulted section of roof, with skylights, in B2

Building 2

Description and external bat roost potential

5.2.7 Building 2 comprised a late 1800s/ early 1900s built two-storey brick and stone-built building with multi-pitched grey slate covered roofs. The roofs have skylights on the eastern most pitch, clay ridge tiles and stone copings. Two stone chimneys were incorporated into the north and south elevations. Cast iron guttering was present together with a mix of metal and plastic framed single and double-glazed windows. Flashing was present at the base of chimneys.

5.2.8 Potential roost features noted from the exterior of B2 included: gaps in ridge bedding mortar, occasional lifted slates, gaps beneath stone coping, potential bat access to wall tops and occasional open joints in masonry.

Internal inspection

5.2.9 Several different sections of roof were present in B2. The southern end of the western roof was unlined and suspended on purlins, rafters, a ridge beam and battens (Plate 4). Approximately 100 mm of glass-fibre insulation was present on the ceiling with a few mouse *Mus musculus* droppings noted, together with quite dense cobwebs in places. Part of the northern end of the western roof void was boarded out with composite boards used as sarking. Within the eastern roof space, a small inaccessible void was present above skylights, with the ceilings lowered to a height below the skylights in more recent times (Plate 5).

5.2.10 Building 2 was considered to display a moderate level of bat roost suitability.

Building 3

Description and external bat roost potential

5.2.11 Building 3 comprised a two-storey stone-faced office building with stone parapets and a flat roof (Plate 3). Metal capping was present on the top of the parapets. Windows were metal framed and single paned.

5.2.12 Potential roosting features on the exterior of B3 comprised lifted metal capping and some sections of lifted flashing around the hopper element of the guttering.

Internal inspection

5.2.13 No roof void was present.

5.2.14 Building 3 was considered to display a low level of bat roost suitability.

Building 4

Description and external bat roost potential

5.2.15 Building 4 comprised a brick-built two-storey office building with a flat roof and parapets (Plate 3). Metal capping was present on the top of the parapets. Windows were metal framed and single paned.

5.2.16 Weep holes were present on the façade (south elevation), potentially allowing bats access to small cavities behind the brickwork. Gaps were also present beneath wall capping, as with Building 3, with lifted flashing also present around the hopper element of the guttering.

Internal inspection

5.2.17 No roof void was present.

5.2.18 Building 4 was considered to display a low level of bat roost suitability.

Building 5

Description and external bat roost potential

5.2.19 Building 5 comprised a 1990s two-storey and largely prefabricated office block with a flat roof (Plate 7). A deep fascia board was present with insect meshing between this feature and the exterior wall panelling. A pebble dash finishing was present on the wall panels.

5.2.20 In places c.1 cm spaces were present between mesh panels, themselves located between the fascia and wall (Plate 8). These access points were expected to lead into a low void between the flat roof and suspended ceiling in this building. In addition, the fascia board was warped resulting in an additional wider gap between this board and the insect mesh.

Internal inspection

5.2.21 No roof void was present, with only a low height space between the flat roof and suspended ceiling.

5.2.22 Building 5 was considered to display an overall low level of bat roosting potential, although a section of the north elevation to the east of B6 was considered to display negligible bat roost suitability as it lacked any potential roost features.

Building 6

Description and external bat roost potential

5.2.23 Building 6 comprised a 1990s two-storey and largely prefabricated office block with a flat roof (Plate 9). A deep fascia was present with a black section of board between this feature and the exterior wall panelling. A pebble dash finishing was present on the wall panels.

5.2.24 No potential roost features were recorded from Building 6.

Internal inspection

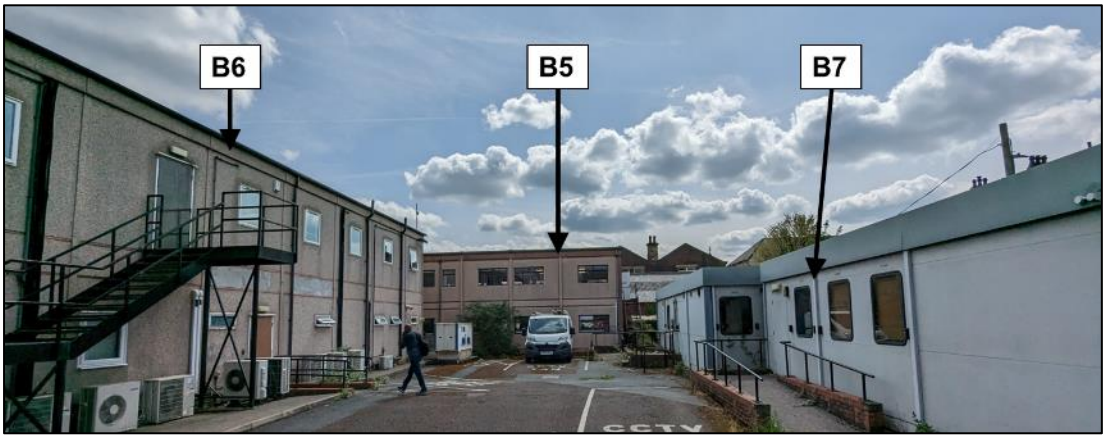
5.2.25 No roof void was present, with only a low height space between the flat roof and suspended ceiling.

5.2.26 Building 6 was considered to display a negligible level of bat roosting potential.

Plate 7. East elevation of B5

Plate 8. Example space between sections of insect mesh between fascia and wall on B5

Plate 9. Looking south towards B5, with B6 on left of image and B7 on right



Building 7

Description and external bat roost potential

5.2.27 Building 7 comprised a single-storey prefabricated Portakabin type building with a flat roof

5.2.28 No potential roost features were recorded from Building 7.

Internal inspection

5.2.29 No roof void was present, with only a low height space between the flat roof and suspended ceiling.

5.2.30 Building 7 was considered to display a negligible level of bat roosting potential.

Building 8

Description and external bat roost potential

5.2.31 Building 8 comprised a fairly modern two-storey brick-faced and flat roofed office building with low parapet walls with metal capping, constructed within an enclosed courtyard at the southwest end of the site. The building has metal framed and single-paned windows.

5.2.32 Crevices were present in places beneath the metal capping on top of the parapet wall tops.

Internal inspection

5.2.33 No roof void was present, with only a low height space between the flat roof and suspended ceiling.

5.2.34 Building 8 was considered to display a low level of bat roosting potential.

Building 9

Description and external bat roost potential

5.2.35 Building 9 comprised a large single-storey brick-built garage with a multi-pitched roof covered in corrugated asbestos-cement sheets with asbestos-cement verge capping and cladding panels on the triangular sections of the gables (Plate 10). Roller shutter doors were present on the west elevation. A single-storey open sided lean-to was present on the north elevation.

5.2.36 Occasional lifted sections of asbestos-cement sheeting were present on the exterior. In addition, it was noted that bats could potentially roost between the flat-backed metal gutter and wall on the north and south elevations.

Internal inspection

5.2.37 Internally the roof was open to the underside of the roof sheets, with the sheeting suspended on steel trusses and purlins (Plate 11). No roof voids were present, skylights were located in the roof pitches and as a result the interior of the building was light and open.

5.2.38 Building 9 was considered to display a low level of bat roost suitability.

Building 10

Description and external bat roost potential

5.2.39 Building 10 comprised a range of single-storey brick and stone built workshops/garages with a dual-pitch stone-slate covered roof with integrated skylights (Plate 12). The verges were mortar-filled and the windows uPVC-framed and double-glazed.

5.2.40 Bat roost potential on the exterior of Building 10 was largely limited to the typical range of crevice spaces between stone roof slates (which differ slightly in depth) and between these slates and the sarking.

Internal inspection

5.2.41 Internally the roofs of B10 were underdrawn with timber sarking and suspended on steel trusses and purlins (Plate 13). One section of the roof was open with no void present, whilst two other sections had 2 or 3 m high voids created by false ceilings. In all cases roof spaces were light as a result of skylights and in common with other buildings surveyed on site, no signs of bat roosting were recorded.

5.2.42 Building 10 was considered to display a moderate level of bat roost suitability.

Walls and Trees

5.2.43 No trees on site displayed features offering more than a negligible level of bat roost suitability.

5.2.44 A retaining wall at the northern end of the site was mainly quite well pointed (Plate 14), although a section comprised stacked waste stone and stone sleepers (Plate 15). Where the wall comprised stacked materials component crevices were inspected.

Whilst these crevices were superficially suitable for bat roosting, they were open and exposed with no signs of bats noted. Overall, the wall was considered to display no more than a negligible level of bat roost suitability.

Plate 10. Northeast corner of B9

Plate 11. Interior of B9

Plate 12. Southwest corner of B10

Plate 13. Example section of roof void from B10

Plate 14. Retaining wall viewed from south

Plate 15. Section of retaining wall built from stacked stone

5.3 Nocturnal Survey

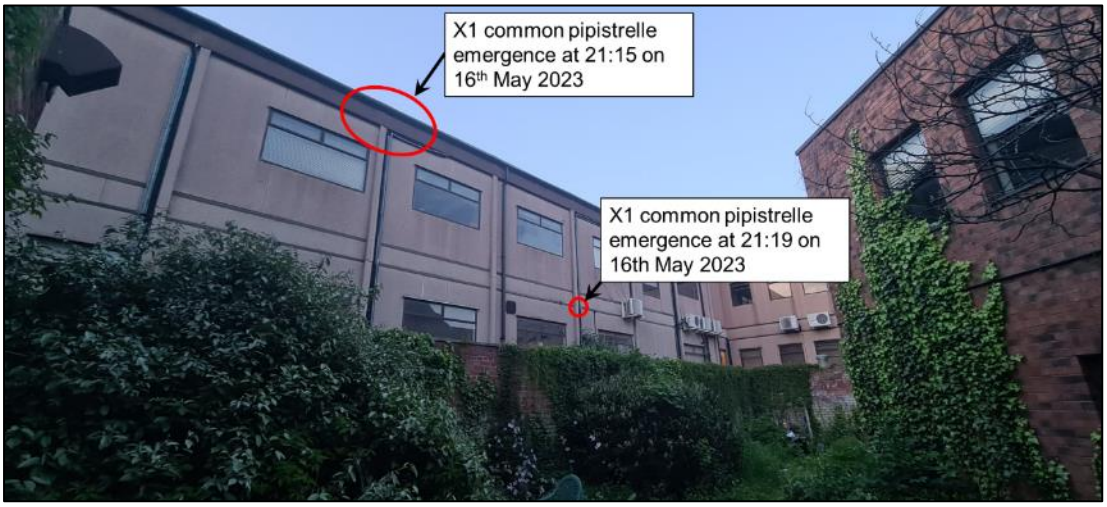
16th May 2023 – dusk emergence survey

5.3.1 The temperature at the beginning of monitoring was 12^{0}C, with a moderate breeze (Beaufort Scale Force 3) and 10% cloud. The temperature dropped to 10^{o}C by the end of the survey with the sky clearing and the breeze lightening to Beaufort Scale Force 1. The weather was dry throughout. Sunset was at 21:03.

5.3.2 Two common pipistrelle were recorded emerging from locations on the south elevation of Building 5 into the courtyard (Plate 16). The first bat emerged from a location associated with a fascia board feature at 21:15 (12 minutes after sunset). The second bat emerged from a location in the south elevation wall at 21.19. A video clip showing a bat emerging from the second roost location can be accessed via this link: https://youtu.be/luTgrzrBZSA. The two roosts recorded are considered to comprise common pipstrelle day roosts, used by single bats.

5.3.3 The only bat species recorded during the nocturnal survey comprised common pipistrelle, with a low overall level of activity recorded and no activity at all noted from several survey positions (i.e. the position on Flint Street). The vast majority of activity that was recorded, was observed within the courtyard formed by Buildings 1, 2, 3, 5 & 8. The first bat recorded comprised the first emerging common pipistrelle bat.

Plate 16. Roost locations recorded during dusk emergence survey on 16th May 2023



25th May 2023 – dusk emergence survey

5.3.4 The temperature at the beginning of monitoring was 14^0C, with a very light air (Beaufort Scale Force 1) and 50% cloud. The temperature stayed the same throughout the survey with the wind ceasing and the cloud clearing. The weather was dry throughout. Sunset was at 21:14.

5.3.5 No bat activity was recorded during this nocturnal survey.

6. Assessment

6.1 Summary and Evaluation of Findings

6.1.1 A single historic grounded bat record (2004) was collected from the site. No signs of bat presence were recorded from any of the surveyed buildings.

6.1.2 Buildings 2 and 10 were considered to display a moderate level of bat roost suitability, with Buildings 1, 3, 4, 5, 8 & 9 considered to display an overall low level of bat roost suitability. Sections of Building 5, and all sections of Buildings 6 & 7 were considered to display a negligible level of bat roost suitability.

6.1.3 All buildings displaying greater than a low level of bat roost suitability have been subject to a single nocturnal survey. A total of two common pipistrelle day roost locations have been recorded from the site with both roosts recorded from the south elevation of Building 5. The two common pipistrelle day roosts recorded are considered to be of low conservation importance (Mitchell Jones, 2004).

6.1.4 A second nocturnal survey is booked in for 15th June 2023 to cover the south elevation of B5, as well as B2 and B10 (the two buildings displaying a moderate level of bat roost suitability).

6.1.5 With the exception of the two roost observations, a very low level of bat activity has been recorded from the site during nocturnal survey work undertaken to date, with all activity relating to common pipistrelle only.

6.1.6 No evidence has been recorded to date to suggest the site may be used as a bat maternity roost for any species of bat. Whilst the buildings display some potential for pipistrelle maternity roosting, the site's location relative to suitable bat foraging habitat is fairly poor. In addition the site is compromised by artificial light spill and the low level of activity is not considered to be reflective of a potential maternity site.

6.1.7 Pipistrelle bats use a very wide variety of roost features over the winter period and they are not dependent upon roost features with stable temperature and/or high humidity (like some bat species require). As a result it possible this species would make some use of site buildings over winter, however, the site lacks any particular appeal for hibernating pipistrelle.

6.2 Legislation and Policy Guidance

6.2.1 Bats receive protection under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and the Wildlife and Countryside Act 1981 (as amended).

6.2.2 It is an offence to:

- Deliberately capture (or take), injure or kill a bat.
- Intentionally or recklessly disturb bats whilst they are occupying a structure or place used for shelter or protection or obstruct access to any such place.
- Damage or destroy the breeding or resting place (roost) of a bat.
- Possess a bat (live or dead), or any part of a bat.
- Intentionally or recklessly obstruct access to a bat roost.
- Sell (or offer for sale) or exchange bats (dead or alive), or parts of parts.

6.2.3 The Convention on Biological Diversity, signed in Rio de Janeiro, Brazil in 1992, requires member states to develop national strategies and to undertake a range of actions aimed at maintaining or restoring biodiversity. The UK Biodiversity Strategy was produced in response to the Convention.

6.2.4 In England & Wales, the Natural Environment and Rural Communities (NERC) Act, 2006 imposes a duty on all public bodies, including local authorities and statutory bodies, in exercising their functions, "to have due regard, as far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity". It notes that "conserving biodiversity includes restoring or enhancing a population or habitat". Barbastelle *Barbastella barbastellus*, Bechstein's bat *Myotis bechsteinii*, brown long-eared bat, greater horseshoe bat *Rhinolophus ferrumequinum*, lesser horseshoe bat *Rhinolophus hipposideros*, noctule *Nyctalus noctula* and soprano pipistrelle are included as priority species within Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. At a more local level there are Local Biodiversity Action Plans for smaller geographical areas which may cover a greater or lesser range of bat species.

6.2.5 Where it is proposed to carry out works which will have an adverse impact on roosting bats, the site must either be registered on the Bat Mitigation Class Licence (BMCL) or a European Protected Species (EPS) license must first be obtained from Natural England. This requirement applies even if no bats are expected to be present when the work is carried out.

6.2.6 The National Planning Policy Framework for England was revised in 2021. This document states that plans should 'promote the conservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity'.

6.3 Further Survey, Recommendations and Enhancements

Bat licensing and further survey

6.3.1 A bat mitigation licence of some form will be required to permit the proposed demolition works. The site appears to be eligible for registration on either the Earned Recognition (ER) or Bat Mitigation Class Licence. Alternatively, a full European Protected Species licence could be obtained in relation to the scheme. In all instances, a licence cannot be applied for until all required consents (i.e. Demolition Consents) has been granted and any nature conservation related planning conditions have been discharged. Depending upon the type of licence, Natural England require between 10 - 30 working days to determine mitigation licence applications.

6.3.2 Given the apparent low level of bat usage of the site, which appears to be restricted to a single species with easy to categorise roosts; it is considered that two nocturnal surveys undertaken during the peak season and in the year of the licence application should be sufficient. It is proposed to apply for the bat licence following the second nocturnal survey and the grant of demolition consent, assuming no relevant conditions first require discharging. If works are delayed past May 2024, then at least one update dusk emergence survey would be necessary.

Timings

6.3.3 The presence of over-wintering bats cannot be ruled out. Therefore demolition works must not commence during the peak hibernation period (December – February).

Avoidance of killing or injuring bats during construction

6.3.4 The demolition works are currently proposed to take place during the bat activity season (approximately April to October). As a result it is proposed to undertake a dusk emergence survey to cover the roosts and wider site the night before demolition works commence, in order to check for additional roosts.

6.3.5 Providing roosts recorded during the pre-start emergence survey accord with those covered by the licence then works will commence with a Toolbox Talk delivered by the licenced bat ecologist to the demolition team. The Toolbox Talk will cover bat legislation, the location of known roosts and precautionary working practices, other potential roost locations on site, the protocol for dealing with bats when the ecologist is not on site and the identification of bat signs.

6.3.6 In order to avoid killing or injuring roosting bats during development, all works to known or suspected bat roost locations will need to be overseen by a licensed bat ecologist. If bats can be captured from roost locations then this will be done and bats moved to a temporary release box. If direct capture of bats from known roost locations is not possible, then known roosts in the south elevation of B5 will be excluded using one-way exclusion devices, to remain in place for at least five nights prior to reinspection by an ecologist and closure.

6.3.7 Once the known roosts have been stripped or excluded, and any nearby potential roost features have been stripped, then demolition works may proceed according to the preferred method.

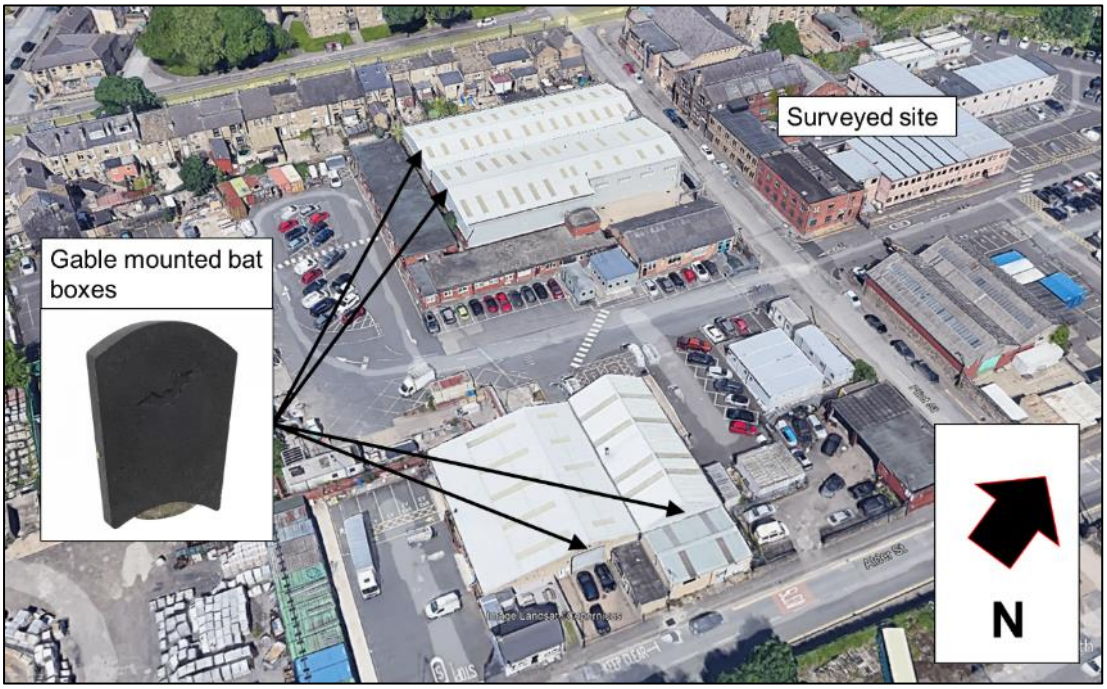
6.3.8 It is recommended that a meeting is held with the client, demolition contractor and ecologist to discuss how best to proceed with the demolition works in a way that safeguards roosting bats.

Long-term roost mitigation

6.3.9 The proposed demolition is being undertaken in advance of any confirmed plans for the site's re-development, although it is understood that the plans are for a future residential development.

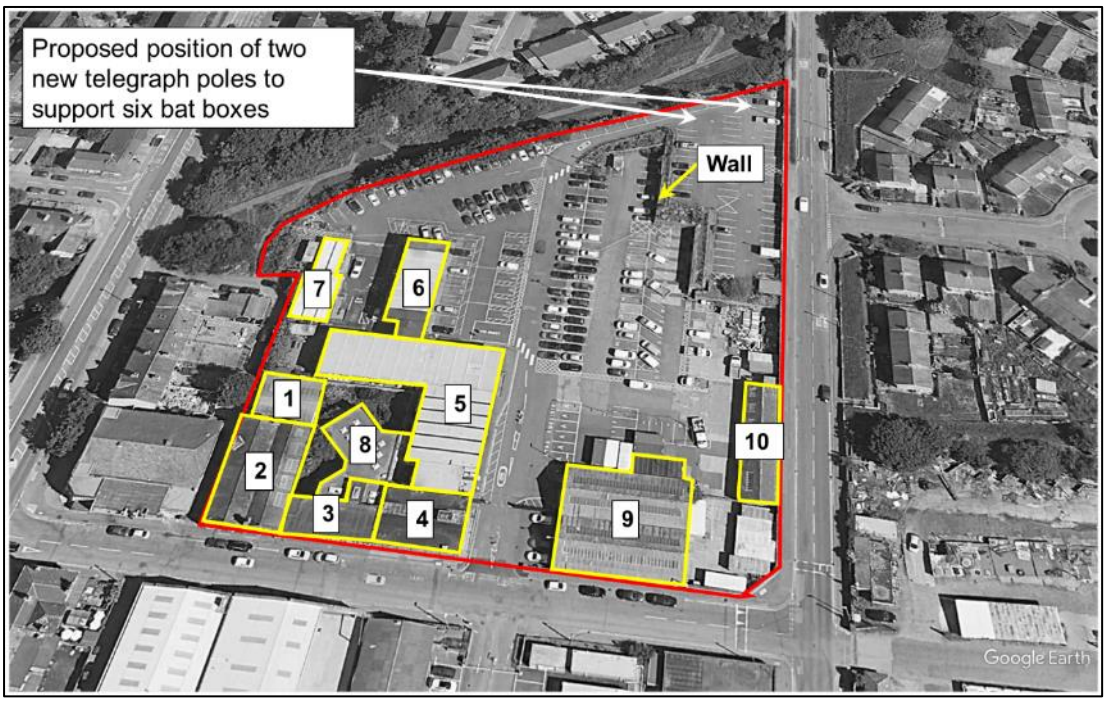
6.3.10 There are no trees present on the Fleet Street site upon which bat boxes could be fixed. There are considered to be two bat roost mitigation options. The first and preferred option comprises the installation of four new bat crevice roost boxes on buildings within a separate Kirklees Council compound to the south of Fleet Street (Figure 3). It should be noted that these buildings need to be retained in the long term for this option to be pursued. Two of the crevice bat boxes would be fitted on south facing gables with the other two on east facing gables. Boxes would be fitted at apex height, away from artificial lighting units. The preferred type of box to be fitted in these locations would be the Beaumaris Woodstone Bat Box – Maxi box.

Figure 3. Proposed location for new building mounted bat boxes on Kirklees Council site to south of Flint Street



6.3.11 If it is not possible to install new bat boxes on retained buildings to the south of Flint Street then it is instead proposed to fit six Greenwood's Ecohabitat crevice bat boxes to two new telegraph poles to be fitted adjacent to the former rail line at the northern end of the Flint Street compound site (Figure 3).

Figure 3. Proposed location for two telegraph poles onto which bat boxes could be mounted



6.3.12 In the future, when residential development plans are being brought forward for the

Flint Street site, the proposals should include the installation of integrated bat boxes are a ratio of one box per new dwelling.

Monitoring surveys

6.3.13 No further monitoring surveys are considered necessary in this instance.

6.4 Conclusions

6.4.1 Two common pipistrelle bat day roosts have been confirmed from Building 5 in the Flint Street compound. The status of these roosts will be verified during a second nocturnal survey to be undertaken on 15th June.

6.4.2 The proposed demolition works will result in the destruction of the roosts and consequently the site will either need to be registered on the BMCL or ER licences, or an EPS mitigation licence will need to be obtained for the scheme. Detail has been provided regarding requirements in relation to obtaining a licence. Proposed roost mitigation comprises new bat boxes, to be installed either on retained buildings to the south of Flint Street, or on new telegraph poles at the northern end of the surveyed site.

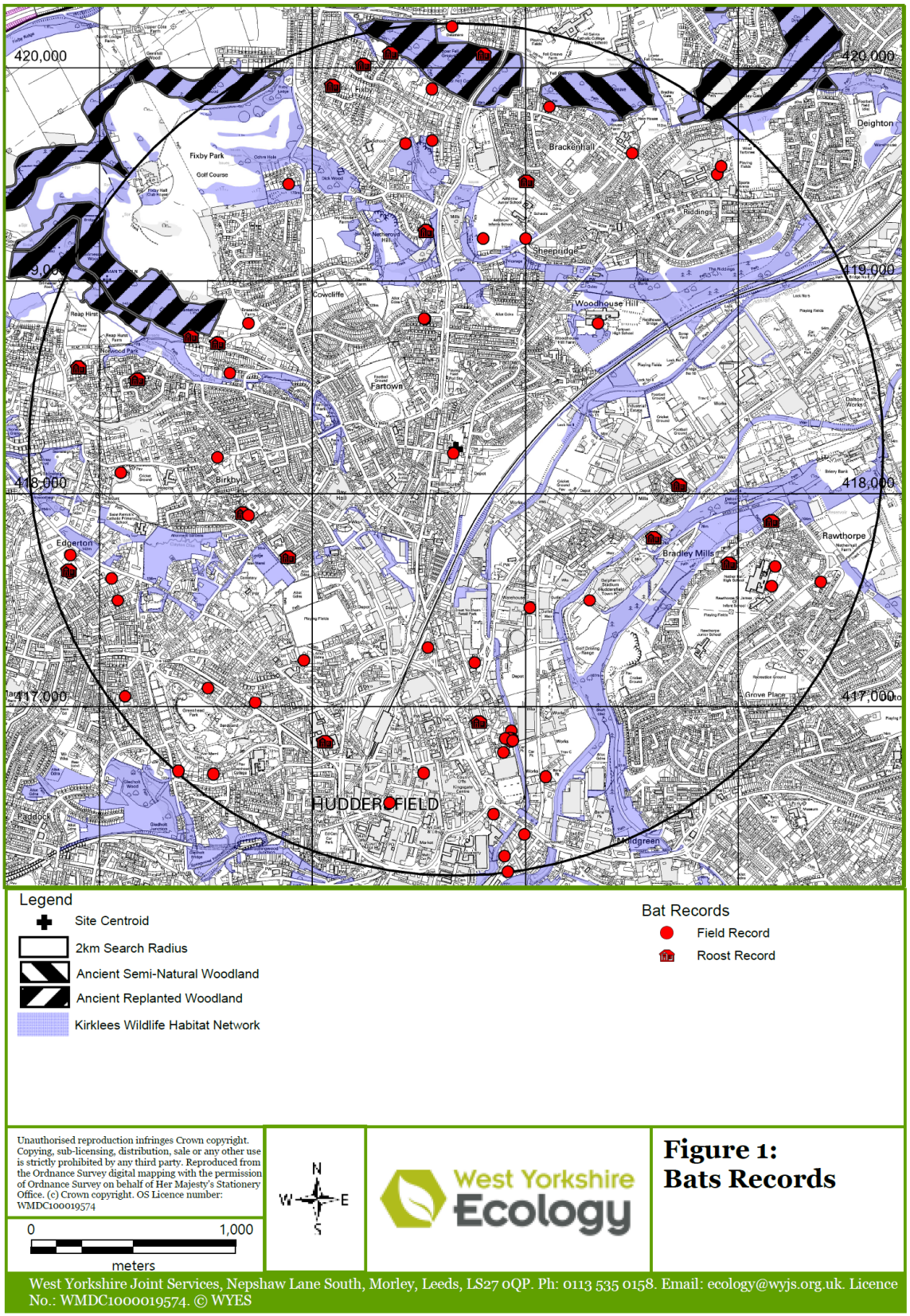
6.4.3 The survey findings are considered to be valid for a period of 12 months, after which an update survey is likely to be required.

7. References

Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines. The Bat Conservation Trust.

Mitchell – Jones, A.J (2004) Bat Mitigation Guidelines. English Nature.

Appendix 1. WYES Bat Records



Appendix 2. Bat Records

In accordance with best practice and the requirements of bat licensing, bat records collected during surveys are supplied to the relevant biological record centres and bat groups. The records to be supplied in accordance with this survey are shown below. House names/numbers are not given out by record holding organisations except under very particular circumstances. Please let us know if you object to the distribution of these records.

Date	Species	Site Address	OS Grid Reference	Notes
16/05/2023	Common pipistrelle	Highways Offices, Flint Street, Huddersfield, HD1 6LG	SE 14641 18241	x2 common pipistrelle day roosts used by a maximum count of two bats