



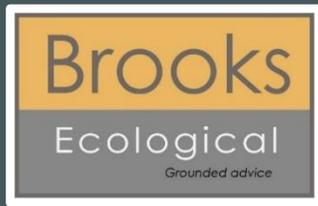
St. Mary's School, Batley



Bat Survey Report

12/10/2023

AHR Architects Ltd.



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Date	12/10/2023
Report duration	In accordance with CIEEM (2019), unless otherwise stated the findings of this report remain valid for a period of 18 months. After this period advice should be sought on the scope of any updating work required.



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Summary Statement

Two buildings on-Site at St. Mary's School in Batley, the convent and the school building, were assessed as providing moderate bat roost suitability.

Two evening emergence surveys have confirmed the presence of a single bat roost in the convent building, and a likely current absence of roosting bats in the school building. A Natural England mitigation licence will be required to derogate offences associated with the destruction of a bat roost which would arise from demolition of this building.

A sufficient level of information has been gathered to support a planning application. However, due to seasonal timings of all surveys undertaken to date, at least one further survey will be required to inform a license application. This survey should be conducted during the next optimal survey period, ideally May or June. This can be carried out as a condition of planning, but may impact proposed development timescales as the licence cannot be secured until planning has been granted and all surveys complete.

Introduction

1. Brooks Ecological was commissioned by AHR Architects Ltd. to carry out a bat roost suitability assessment, and subsequent bat emergence surveys, at St Mary's School, Batley (SE 2372 2455).
2. The application-Site, 'the Site', comprises a former school building and a separate convent building, both unused for a number of years.
3. Proposals are to demolish the Convent, and part of the Old School building, to make way for redevelopment.
4. The Site was subject to survey by a third party in 2019, which found two active bat roosts, one in each building. Updating survey was recommended to inform the planning application and licensing.

Figure 1 The surveyed buildings.



Method

5. A thorough daytime inspection of the Site was made in August 2023 to look for evidence of bats and assess suitability for roosting. Evidence of bats may take the form of droppings, feeding remains, live bats, dead bats, stains on masonry or timber from the oils in bats' fur, and claw marks made by bats regularly roosting in the same location.
6. Bat roosting potential of the building was classified according to the following criteria set out in Table 1, taken from the Bat Conservation Trust Good Practice Guidelines (2016)¹.

Table 1 Bat Roosting Suitability of Buildings and Trees.

Suitability	Criteria
<i>Negligible</i>	Negligible habitat features on-Site likely to be used by roosting bats.
<i>Low</i>	A structure with one or more potential roost sites that could be used by individual bats opportunistically. 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 a larger number of bats (i.e. unlikely to be suitable for maternity or hibernation). A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.
<i>Moderate</i>	A structure or tree with one or more potential roost sites that could be used 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 - the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).
<i>High</i>	A structure or tree 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, protections, conditions and surrounding habitats.

¹ Since this survey, a new edition of BCTG has been published. The guidance used during this survey was the most up to date at the time of survey.

Box 1 *Bat roosts*

Bats roost in buildings and trees in different locations depending upon time of year and environmental factors such as position of the sun, proximity to heat sources and feeding grounds. The following types are commonly referred to:

Transitional roosts

Bats frequently gather early in the season (March to April) before dispersing to summer roosts. Bats can be found in high numbers in these roosts for a very short period. Transitional roosts can also be found shortly before hibernation in August to October when bats (depending upon species) can gather in roosts not used earlier in the season.

Maternity roosts

These are among the most important roosts and are normally occupied from May to August. Depending on the species involved, some maternity roosts can contain a very significant proportion of the local population.

Summer (non-breeding) roosts

Small groups of non-breeding female and male bats can gather in these roosts or bats from a local population may choose to roost individually. There are normally a large number of suitable locations for summer non-breeding roosts and these may be routinely used or used only on an occasional basis. Irregularly used summer roosts can be very hard to find without unreasonable survey effort.

Mating roosts

Around September bats will gather in roost to mate; these are often in different locations than summer or breeding roosts.

Hibernation roosts

As bats in hibernation roosts are highly vulnerable to disturbance and bats can be present in large numbers these are considered to be among the most important bat roosts. Many species of bats roost in large and nationally important hibernation roosts associated with underground sites, many of which are well known and protected. However, the most common bat in the UK (the common pipistrelle) is largely unaccounted for in winter but thought to disperse and roost individually or in small groups in thermally stable cracks and crevices in thick walls or trees.

Box 2 *Legal background*

Bats are afforded full protection under The Wildlife and Countryside Act (1981) plus amendments, and the Conservation of Habitats and Species Regulations 2010. Under these Acts it is an offence among others, to recklessly kill, injure or disturb bats. It is also an offence to destroy or obstruct a roost even if bats are not in occupancy at the time of the action.

There are no defences against contravention of the Habitats Regulations 2010 which means that it is important for detailed and well-designed bat surveys to be carried out, prior to carrying out activities that may impact upon bat roosts such as demolition of buildings or removal of trees.

Where bats are found within a potential development site, a license from Natural England may need to be secured if works that could otherwise contravene legislation are to be carried out. These licences are only issued where Natural England is satisfied that works are unavoidable and would not have a negative impact on the favourable conservation status of bats. A Natural England license requires that the potential development site has full planning permission and that bats were a material consideration of the planning permission.

Records

- The local records provider, in this case West Yorkshire Bat Group (WYBG), was asked to provide all records from within a 1km radius of the Site.
- Five records were returned, pertaining to pipistrelle and vesper bat species, all located c. 500m north to northwest of the Site.

National, Regional, and Local Status

- The application-Site lies within the natural range of 10 species of bat. These are summarised in Table 2 below, together with a note on each species' national status, relative abundance, and status within the 1km search area.

EPSM Licences

- There are no European Protected Species Mitigation (EPSM) licences returned within 1km of the Site.

Table 2 List of bat species known to occur in West Yorkshire, ordered in increasing level of significance to their national proportion.

Species	National Status	Within 1km radius	
		Recorded	Roosts known
Common pipistrelle <i>Pipistrellus pipistrellus</i>	Common and increasing	Yes	Yes
Soprano pipistrelle <i>P. pygmaeus</i>	Common and stable	-	-
Daubenton's bat <i>Myotis daubentonii</i>	Common and increasing	-	-
Brown long-eared bat <i>Plecotus auritus</i>	Common and stable	-	-
Natterer's bat <i>M. nattereri</i>	Common and increasing	-	-
Whiskered bat <i>M. mystacinus</i>	Uncommon but stable	-	-
Noctule <i>Nyctalus noctula</i>	Uncommon but stable	-	-
Brandt's bat <i>M. brandtii</i>	Uncommon but stable	-	-
Leisler's bat <i>Nyctalus leisleri</i>	Uncommon and trend unknown	-	-
Nathusius' pipistrelle <i>P. nathusii</i>	Uncommon but stable	-	-

Site Context

- The Site is located in Batley, c. 11.5km southwest of Leeds. It lies within the wider site of St Mary's Church, and is bound immediately to the north and south by Cross Bank Road and North Bank Road respectively. To the east, and beyond Cross Bank Road to the north lies industrial and residential development.
- St Mary's Primary School and associated grounds lie to the immediate west, providing some structured habitat of value to bats, extending into pastoral land for c. 1km. Batley Cemetery can also be found to the south, which offers some lower value habitat but is well connected to the Site.
- The disused railway forming the Wilton Park Greenway comprises the closest wildlife corridor, although it does not extend far, beginning c. 450m north of Site. Further afield, the tree-flanked TransPennine Huddersfield line bisects the landscape south to north c. 1km to the east. Neither feature has strong links to the Site.
- The wider landscape comprises a mix of urban development, arable and pastoral land, and recreational greenspace, with small pockets of woodland interspersed throughout.

Figure 2 Site context.



Survey Results

15. The Site comprises two buildings: an old school building, and a convent, both of which have been disused for a number of years, with the convent in particular showing signs of disrepair.
16. Neither building was accessed internally.

Figure 3 Location of buildings on-Site.



Convent & Garage

17. The Convent comprises multiple one- and two-storey adjoining buildings, constructed of a mixture of coursed stone and brick, with a combination of hipped and gabled slate roofs. A shallow pitched extension is present to the northeast corner, and a flat roof extension to the southeastern corner. A single storey, flat roof concrete garage, with wooden cladding to one elevation, is present to the southwest corner.

Figures 4 and 5 General view of convent (l) and garage (r).



18. There is considerable growth of ivy to the southern and eastern elevations, but where visible the walls appear to be in good repair, with no gaps offering access to potential roosting features (PRFs).

Figures 6 and 7 Showing gaps to window lintel and garage window.



19. The doors and windows of the convent are wooden framed, with concrete sills and lintels, boarded over at ground floor level with chip-board covered with aluminium. These are generally well-sealed, with the exception of one area of disrepair where the lintel has come away from the window.
20. Some gaps are present to the wooden boarding over the garage window to the southern elevation, although these are well-covered, with cobwebs evidencing a lack of recent use by bats.

Figures 8 and 9 Disrepair at eaves, revealing gaps in brickwork.



21. The eaves and guttering are of wooden construction and mostly in good condition, with the exception of above the northeastern and southeastern corners where it has fallen away from the building, revealing gaps in masonry and below the roof edge.
22. The eaves of the extension to the southeast also appear in disrepair, allowing possible access to the wall tops and roof void.

Figures 10 and 11 Missing quoin mortar (l) and gap behind eaves (r).



23. The decorative gable beam ends to the east of the building appear in decent repair, but are overgrown with ivy which could conceal gaps.
24. Some areas of missing mortar are present around the decorative quoins to the northwestern corner, along with some areas where the eaves have come away from the wall.

Old School Building

25. The Old School building comprises a single-storey disused school building, constructed of coursed stone, featuring a slate gabled roof with dormers. Windows are wooden framed with stone sills and lintels which sit flush with the wall, and are boarded up with chip-board.
26. The walls are in fine condition with no visible gaps to mortar and are mostly free from coverings of ivy.

Figures 12 and 13 Gaps to window lintel (l) and around boarding (r).



27. Some gaps are present to window lintels, and to the edges of the window boarding.

Figures 14 and 15 Damage at hidden gutter and to northern roof pitch.



28. The wall tops feature a hidden gutter, with a stone exterior cornice in good condition. Some areas of the wooden eaves above the gutter are in disrepair, however, with some gaps to roof tiles offering access into the roof void.
29. Slipped roof tiles are present throughout both pitches of the roof, with severe damage to an area of the northern elevation creating a large gap in the roof work.

Summary

30. Based on the features present, the two buildings are assessed as having moderate suitability for supporting roosts.

Table 3 Summary of Roost Potential of Buildings.

Building	Key Features	Bat Roost Suitability
Convent & Garage	Damaged window lintel, exposed wall tops and ivy covering walls roof	Moderate
Old School	Gaps to window lintel and boarding, damage to eaves and slates	Moderate

Figure 16 Showing bat roost suitability of on-Site buildings.



Conclusions

31. In line with best practice guidelines (Bat Conservation Trust, 2016), at least two bat emergence or re-entry surveys were recommended to confirm the presence/likely absence of roosting bats.
32. This recommendation was relayed to the client, and two surveys duly commissioned. Survey results are detailed in the following section.

Bat Emergence Survey - Method

33. Brooks Ecological specialises in bat surveys ranging from individual buildings through to complex sites requiring numerous visits with large teams. In terms of the survey effort, number of personnel, and number of visits required to be able to properly evaluate the building's use by bats, we refer to the Bat Conservation Trust Survey Good Practice Guidelines (2016). However, these guidelines are not prescriptive, and we approach each site individually as required using our professional judgement and significant experience base.
34. In this case, two visits with a team of seven surveyors were deemed necessary to fully evaluate the potential use of the Site for roosting.
35. Surveys were carried out with surveyors positioned around the building to cover all aspects where bats could potentially emerge, and to establish activity levels around the Site.
36. The surveyors, using heterodyne detectors, automated EchoMeter Touch 2 and Anabat Scout bat detectors, and a T2Pro night vision aid, were in place at least 15 minutes before sunset and left once all species of bat would be expected to have left a roost and patterns of activity within the Site had been appraised. Conditions and dates are summarised in Table 4 below.

Table 4 Survey conditions.

Date	Survey Type	Temp. Start/End	Weather
30/08/2023	Emergence	13/13°C	Dry. 70% humidity. 0% cloud cover. Calm (B0). High invertebrate activity.
13/09/2023	Emergence	16/15°C	Dry. 70% humidity. 4% cloud cover. Calm (B0). Low invertebrate activity.

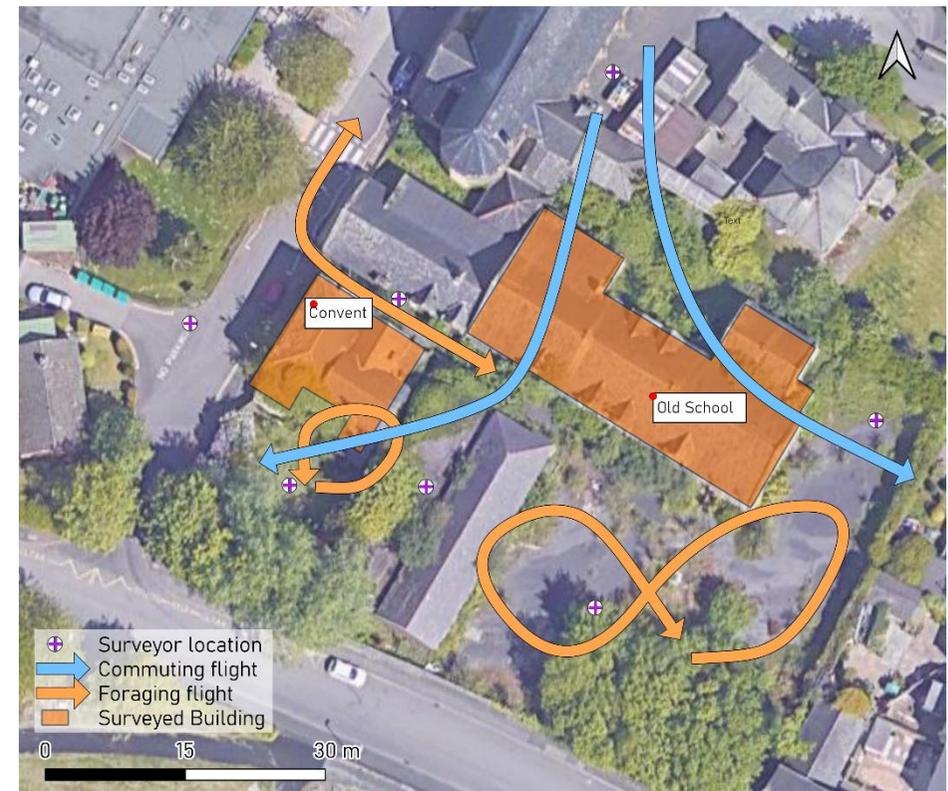
37. Survey was directed by Sam Kitching BSc (Hons) MCIEEM. Sam has over 10 years' experience undertaking bat surveys in a professional capacity and is registered to use the bat survey class licence (Level 2), registration number CLS-CLS-2015-15555.

Survey Results

Emergence - 30th August 2023 (sunset: 19:45)

38. Surveyors were positioned so as to cover all features with bat roost suitability.
39. Overall, activity levels can be considered low-moderate, with regular activity observed by up to three individual common pipistrelle bats at a time.
40. The first observation was made at 20:13, when a single common pipistrelle was observed commuting over the southeast corner of the Convent to briefly forage in the garden to the south of the building.
41. Further observations then began with regularity at 20:29, when a single common pipistrelle was observed commuting southeast over the Site.
42. This was followed by foraging at 20:32 by a single common pipistrelle in the area of scrub to the south of the Site, which continued regularly until 20:51.
43. Regular foraging by up to three common pipistrelles was observed to the west of both buildings, and up and down the narrow channel between the buildings, from 20:33 until 20:57.
44. Commuting was regularly observed by individual common pipistrelles from the north of the Site, over both buildings, to forage in the garden and scrub to the south of both buildings.
45. Intermittent foraging was observed around the eastern elevation of the Convent from 20:36 until 20:58. Interaction by individual common pipistrelles was observed at the apex of the gable at 20:45 and 20:49.
46. Common pipistrelles were heard, but not seen, in multiple locations throughout the Site from 20:54, until the last observation at 21:00.
47. No roosts were identified, or suspected, within the Old School. No emergences were observed from the Convent, but interaction by individual common pipistrelles with what was later found to be a roost feature was observed.

Figure 17 Summary of bat activity observed during emergence survey 30th Aug.



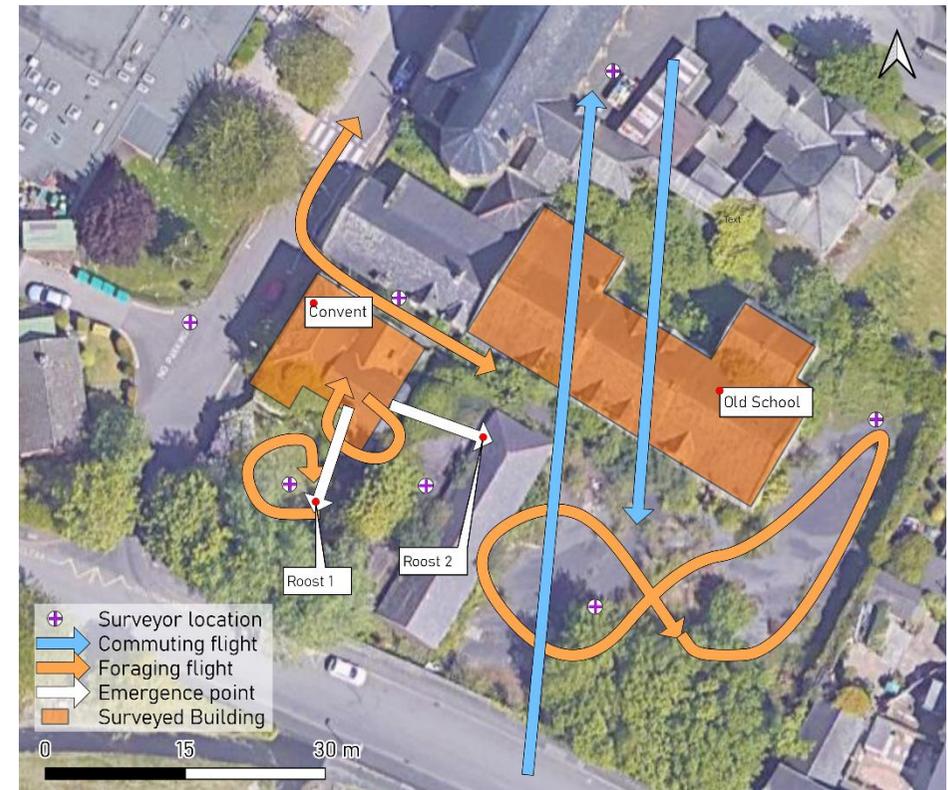
Emergence - 13th September 2023 (sunset: 19:28)

48. Overall, activity levels were found to be lower than the previous visit, with less regular foraging by up to three common pipistrelles.
49. The first observation was made at 19:39, when a common pipistrelle was heard, but not seen, by a surveyor stood to the west of the Convent. This was followed by the same observation at 19:48.
50. Up to two common pipistrelles were observed foraging over the scrub to the east and south of the Old School, intermittently from 19:48 until the end of the survey. These are likely the bats heard to the west of the Convent.
51. Two bats were observed emerging from the base of the southern chimney stack of the Convent, at 19:54 and again at 19:55. The first was also seen to forage above vegetation around the corner of this building. This has identified as Roost 1, seen in Figures 18 and 20.
52. Up to three common pipistrelles were observed foraging up and down the narrow channel between the two buildings, from 19:58 until 20:17.
53. At 20:00, a single common pipistrelle was observed emerging from the apex of the gable on the eastern elevation of the Convent, identified as Roost 2 in Figures 19 and 20.

Figures 18 and 19 Locations of emergences - southern elevation (l) and eastern elevation (r).



Figure 20 Summary of bat activity observed during emergence survey 13th Sept.



Evaluation & Conclusion

54. Surveys undertaken by Ecus in 2019 identified the presence of two, small, common pipistrelle day roosts, one in each building surveyed.
55. Two evening emergence surveys conducted by Brooks Ecological in late August and September 2023 have identified two active bat roosts within the Convent: Roost 1 located within the brick work of the chimney stack and Roost 2 at the apex of the eastern gable. Both roosts are assessed as non-breeding day roosts, used by individual or very low numbers of common pipistrelle bats. Although equally legally protected, these roosts are assessed as being of low conservation status. There is no reason to suspect that a licence for their destruction could not be licenced and that suitable mitigation could easily be incorporated into the redeveloped site.
56. No roosts have been identified in 2023 within the Old School building.
57. Current information (including historic survey results) should be sufficient to inform a planning application. However, as surveys were conducted at the end of and outside of the peak survey season, further survey will be required between late May to late June 2024 to inform a license application.
58. Given the late stage of the season at which these surveys were carried out, best practice would dictate that the roost location on the School Building (B2) identified in 2019 would also be covered by further survey, to ensure ongoing likely absence of roosting at this location.

Enhancement

59. The NPPF puts emphasis on development delivering biodiversity enhancement above and beyond mitigating or compensating for any impacts.
60. To this end the new development could include integral bat roost features to offer suitable habitat in the long term.

Natural England Licence

61. In proceeding to use, or apply for use of either license, it will be important that certain conditions are met. These are discussed below in relation to the application Site:
Has sufficient survey been carried out - is sufficient information known about the roost and its use?

62. Not yet - two presence/absence surveys have been undertaken outside of the optimal season, by a team of experienced surveyors, overseen by a licensed surveyor, and using suitable teams of assistants and equipment.
63. Due to the timing of the surveys, the absence of a roost within the Old School is yet to be determined. However, activity across the rest of the Site was low and larger roosts are not suspected. In line with Natural England guidance, one further survey is recommended to collect sufficient information about the roost for licensing.

Has detailed planning permission been granted for the Site and have all conditions relating to wildlife been discharged?

64. No, planning permission is currently being sought.
65. It will be important to review any wildlife-based conditions at the earliest opportunity, as a licence can only be applied for once full planning permission has been secured, and all pre-commencement planning conditions relating to ecology have been discharged.

Can the project satisfy the three licensing tests?

(i) FCS Test (Regulation 53(9)(b) - Can the favourable conservation status of bats be protected?

66. Yes - the roost appears to be of low conservation significance, and its loss will not impact significantly on bat populations.

(ii) Purpose Test (Regulation 53(2)(e) - Is the purpose of the proposed activity one which is licensable and demonstrable?

67. Yes - the project would be able to apply under the purpose of 'Imperative Reasons of Over-riding Public Interest' (IROPI), meaning that proof of its economic and social imperative would be required.

68. In presenting the application, the ecologist would need to be provided with access to the project's planning consultant and relevant documents.

(iii) The No Satisfactory Alternative Test (Regulation 53(9)(a) - Have alternatives to the proposed activity been considered and ruled out?

69. Yes - Redevelopment of the Site cannot accommodate the existing buildings. As part of the licence application, the project's planning consultant would need to provide evidence that an alternative to demolition was considered and deemed unsuitable for modern development.
70. You would however need to present information which showed that alternatives in terms of the use of the Site, the layout, and timing of works had been considered and the design arrived at represents the least disturbing/affecting possible.

Mitigation

71. Natural England will not require specific mitigation for the licensed (BMCL) loss of these roosts. However, replacement roost features are always recommended so as to comply with the NPPF.
72. Mitigation could include integral bat boxes being incorporated into the new build. Two interim bat boxes will also be required, which would be placed in trees or on buildings around the edge of the Site allowing the introduction of new roosts at an early stage of development and prior to the loss of the identified roosts.
73. In terms of the demolition of the buildings, the following method should be agreed under licence, but should not be the subject of any condition of planning.
 - Prior to any works commencing at the Site, the ecologist will conduct a Site meeting and toolbox talk with contractors. This will make clear the licensed method and the principle that should any additional roosts be encountered during refurbishment, that works will stop immediately whilst the ecologist's advice is sought.
 - The roost building should be retained as the last building to be worked upon, with any demolition works taking place prior. This will encourage any bats present to move away of their own accord and avoid the chance of them relocating to other crevices in other buildings on-Site.
 - The interim boxes will be installed prior to demolition of the roost buildings as required.
 - As the first stage of these works, safe access will be provided to the roost features to allow their full inspection. Next, the ecologist will oversee the soft demolition of the identified roost features. The ecologist will confirm the absence of bats or effect the removal of an appropriate number of bats to the interim bat boxes mounted on nearby trees or buildings.
 - Once the ecologist has confirmed in writing that bats are absent, demolition of the roost building can be completed.
 - Permanent roost features will then be built into the fabric of the new build, and their correct installation confirmed by the named Ecologist.

References

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