

Precautionary Working Method Statement - Bats

Storthes Hall Campus



Prepared for Ubrique Investments Ltd.

Quality Assurance

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Any protected species records will be submitted to the appropriate biological records centre on an annual basis.

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1. Introduction

1.1 Project Background

This Precautionary Working Method Statement (PWMS) has been developed to facilitate the demolition works which are part of the Storthes Hall Lane redevelopment project and to ensure that bats are not harmed and no offences committed under the Conservation of Habitats and species regulations 2017 (as amended). The Storthes Hall Lane redevelopment project involves the demolition of all student residential blocks and the renovation of the administration block and gate house. A Preliminary Building Assessment (PBA) and subsequent bat activity surveys were undertaken in May/June 2025 which recorded seven day roosts for Common pipistrelle bats and *Myotis* sp.

This PWMS document forms part of the wider project documentation and has been prepared using data collected on site since 2018. This document should be read in conjunction with the following reports:

- ✚ Invasive Species Protocol 2025, Storthes Hall Campus. July 2025. S.A.P Ecology & Environmental Ltd.
- ✚ Bat Survey Report Update 2025, Storthes Hall Campus. July 2025. S.A.P Ecology & Environmental Ltd
- ✚ EclA Update, Storthes Hall Campus. July 2025. S.A.P Ecology & Environmental Ltd
- ✚ Demolition Environmental Management Plan (Biodiversity), July 2025, S.A.P Ecology & Environmental Ltd.
- ✚ Demolition Environmental Management Plan (Construction), May 2025, D Hughes Demolition & Excavation Ltd.
- ✚ Construction Phase Plan (CPP), May 2025, D Hughes Demolition & Excavation Ltd.
- ✚ BS 5837:2012 Arboricultural Survey, Storthes Hall Student Village, Kirkburton (ref: 1337.003.ENZ.XX.00.RP.AR.45.101. Enzygo Ltd.
- ✚ Arboricultural Survey Report, Storthes Hall Student Village (ref:1337.003.ENZ.XX.00.R.AR.45.101) Enzygo Ltd.
- ✚ Bat Survey Report, Storthes Hall Student Village (ref: 1337.003.EC.R.002). Enzygo Ltd.
- ✚ Preliminary Ecological Appraisal, Storthes Hall Student Village (ref: SHF.1337.003.EC.R.001). Enzygo Ltd.

1.2 Legislative context & Planning requirements

In England and Wales, bats and their roosts are protected under the Conservation of Species and Habitats Regulations 2017 (as amended) and the Wildlife & Countryside Act 1981 (as amended). Taken together, this legislation makes it an offense to:

- Deliberately capture (or take), injure or kill a bat;
- Intentionally or recklessly disturb a group of bats where the disturbance is likely to significantly affect the ability of the animals to survive, breed, or nurture their young or likely to significantly affect the local distribution or abundance of the species whether in roost or not;
- Damage or destroy the breeding or resting place of a bat;
- Possess a bat (alive or dead) or any part of a bat;
- Intentionally or recklessly obstruct access to a bat roost;
- Sell (or offer to sale) or exchange bats (alive or dead) or parts of bats.

Bats tend to re-use the same roosts year after year and therefore a roost is protected whether bats are present or not.

In addition to the above legislation, the National Planning Policy Framework (NPPF 2023) gives further protection with regards to development. It states that *“to protect and enhance biodiversity and geodiversity, plans should: promote the conservation...and the protection and recovery of priority species...”*

2. Site Assessment & Risk of Impacts

The site consists of a disused early Edwardian-era mental health hospital. During the Second World War the hospital came under the management of the War Office for the treatment of injured servicemen. In 1948 the facility came under the management of the newly founded NHS. In the 1990’s the site was used as a residential campus for students attending the University of Huddersfield which has been its most recent use until being abandoned in June 2024.

A Preliminary Building Assessment was undertaken on the property in May 2025 to update the results of surveys carried out in 2018 and 2022. The survey was undertaken by Sarah Parkin (Natural England Class 2 licence 2016—CLS-CLS to assess the 22 buildings proposed for demolition/renovation at Storthes Hall for suitability to support roosting bats. Dusk emergence surveys were subsequently conducted on all buildings during May/June 2025.

All surveys were conducted in line with the BCT Good Practice Guidelines, 4th edition (Collins, 2023).

2.1 Survey Results

Preliminary Building Assessment

All of the 22 buildings recorded a ‘low’ level of suitability to support roosting bats due to the number and type of potential roosting opportunities (mainly gaps under barge boards and gaps in roof tiles where vents had been removed) and evidence of bats in the form of bat droppings within buildings 19 and 20.

Dusk Emergence Surveys

Seven bat roost locations were recorded during the emergence surveys (Roosts 11-17) in buildings 3, 8, 13, 16, 18 and 20 for low numbers (1-2) Common pipistrelle (Roosts 11-16) and *Myotis* sp. bats (Roost 17). These were determined to be day roosts for male/non-breeding female bats.

2.2 Risk of Impacts

Considering the results of the emergence surveys, the proposed demolition of buildings 1-20 will result in a negative impact on bats and result in the disturbance/destruction of at least seven bat roosts. These roosts consist of day roosts for male or non-breeding female Common pipistrelle (Roosts 11-16) and *Myotis* sp. bats (Roost 17). The roosts contained 1-2 bats, in each, therefore it is not considered that the loss of these roosts will have an impact on the local or national population of Common pipistrelle or (likely) Natterers bats. The methodology outlined in this PWMS detailing Reasonable Avoidance Measures (RAMs) should be followed at all times during demolition works to reduce the risk to bats during works.

2.3 Scope of Works

Buildings 1-20 are to be demolished in their entirety with buildings 21 and 22 undergoing renovations. A European Protected Species Licence (EPSL) will need to have been granted by Natural England (NE) prior to works commencing in order to cover the legal destruction of the known bat roosts.

3. Reasonable Avoidance Measures

Once an appropriate EPS Licence has been attained from NE, the following measures will be implemented.

3.1 Timing of Works

Works should proceed during the winter months (November – March inclusive) to limit the chance of bats being present during works and therefore reduce the chance of death or injury.

3.2 Alternative Roosting Provision & Toolbox Talk

Five Schwegler 1FF bat boxes will be erected on the southernly aspects of mature broadleaved trees within 100m of known bat roost locations to provide alternative roosting opportunities and provide receptors for any bats requiring translocation during works. These bat boxes will be installed by the licenced bat ecologist.

Prior to the commencement of demolition works on site, all contractors will receive a toolbox talk from a licenced bat ecologist regarding bats, their protection and preferred roosting features. The toolbox talk will include information on how to proceed if bats are discovered during the course of works.

3.3 Ecological Clerk of Works (ECoW)

Following the Toolbox Talk, all known bat roosts will be exposed under the supervision of a licenced bat ecologist. The removal of all ridge and roof tiles, barge boards, insulation and other associated material within 5m of known roost locations will be removed by hand and any bats found will be translocated to the nearby bat boxes by the licenced bat ecologist. If a species of bat not covered under the EPS Licence is discovered, all works must cease, and NE contacted to agree an appropriate course of action. If bats are found (or suspected to be found) in the absence of the ecologist, works must stop immediately and contact the ecologist for advice.