

Sycamore Grange,
Golcar, HD3 4ST

**Precautionary Working Method Statement
for Bats (Non-Licensed)**

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1 Introduction and Background

- 1.1.1.0 This report presents a Non-Licensed Precautionary Working Method Statement for Bats in relation to the proposed demolition of buildings at Sycamore Grange, Golcar, Huddersfield, HD3 4ST.
- 1.1.1.1 This document should be read in conjunction with the following document (although all key information from the Preliminary Bat Roost Assessment has been reproduced in this document):
- Quants Environmental Ltd. (2024). Sycamore Grange, Golcar, HD3 4ST. Preliminary Bat Roost Assessment, January 2024. Ref 1914a.
- 1.1.1.2 The site is located at OS grid reference SE 1045 1642 and comprises a two-storey building. The site is located in the centre of Golcar; approximately 3.7 km west of the town centre of Huddersfield, and approximately 800 metres north of the River Colne.
- 1.1.1.3 The Preliminary Bat Roost Assessment¹ did not identify any evidence of bats at the site (during a survey on 22nd January 2024) and the desk study did not identify any previous records of bats within 250 metres of the site. However, the Preliminary Bat Roost Assessment concluded that the building has low bat roost potential due to the presence of several potential bat roost features behind the roof verge throughout the building and went on to recommend a minimum of one dusk emergence bat survey (during the optimal survey period of May-August) prior to any works affecting the building, in accordance with current good practice guidelines².
- 1.1.1.4 During January 2024 and February 2024, the building has suffered repeated break-ins which has disturbed asbestos-containing-materials (ACMs) in the building which poses a health and safety risk, including to people entering the site in the future, by whatever means.
- 1.1.1.5 Due to the health and safety risk associated with disturbed ACMs at the site, it is not acceptable from a health and safety point of view to wait until a Dusk Emergence Bat Survey can be undertaken during the optimal May-August survey period. Therefore, this document presents a Non-Licensed Bat Method Statement which sets out a precautionary approach to dismantling those parts of the building identified as having 'low bat roost potential' without having undertaken the Dusk Emergence Bat Survey recommended in the original report¹.
- 1.1.1.6 The aims of this document are as follows:
- To present the site baseline information relating to bats.
 - To present a Precautionary Working Method Statement for Bats (Non-Licensed) setting out a precautionary approach to dismantling those parts of the building with potential to support bat roosts including a 'Legal Compliance Protocol' to be implemented in the event that a bat is found during the work.
- 1.1.1.7 This document has been prepared in accordance with current good practice guidelines on Precautionary Working Method Statements (PWMSs)³ by Toby Fisher CEnv MCIEEM (a Bat Licensed Ecologist⁴ with over 20 years' experience as an ecological consultant in the UK).

¹ Quants Environmental Ltd. (2024). Sycamore Grange, Golcar, HD3 4ST. Preliminary Bat Roost Assessment, January 2024. Ref 1914a.

² Collins, J. (ed.). (2023). Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6.

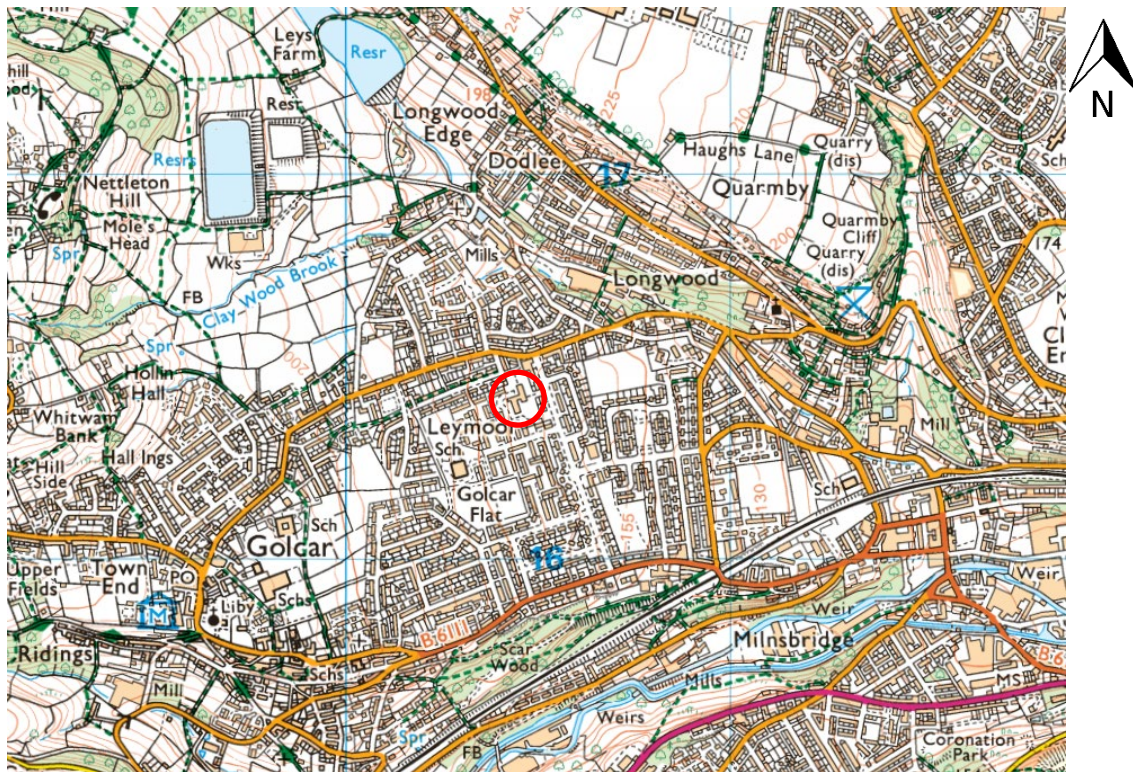
³ Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1. Chartered Institute of Ecology and Environmental Management, Ampfield.

⁴ Natural England Class Licence Registration No. 2015-10756-CLS-CLS – CL18 Survey Level 2 Bats.

Figure 1. Site Location (aerial imagery dated 2021)



Figure 2. Site Location



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2 Baseline Information

2.1 Desk Study

2.1.1.1 West Yorkshire Bat Group (WYBG) was contacted for searches of previous bat records within a 2 km radius of the site centre. In addition, the following data sources were searched for European Protected Species Mitigation (EPSM) licences and habitat features of relevance to the assessment such as nearby woodland:

- Multi Agency Geographic Information for the Countryside (MAGIC).
- Ordnance Survey 1:10,000 mapping.
- Aerial imagery (dated 2021).

2.1.1.2 WYBG provided 17 previous bat records within the search area (see Appendix 3) comprising the following species: Common Pipistrelle (*Pipistrellus pipistrellus*), Pipistrelle Bat species (*Pipistrellus*), Natterer's Bat (*Myotis nattereri*) and Vesper Bat species (*Vespertilionidae*). There are two records within 600 metres of the site:

- One record of a grounded Vesper bat at 42 Leymoor Road, Longwood, Huddersfield, Kirklees (grid ref. SE10681661) approximately 295 metres north-east of the site, dated 30/06/2005.
- One record of a possible roost of Vesper bats at Broomfield House, Broomroyd, Milnsbridge, Huddersfield (grid ref. SE108165) approximately 350 metres east of the site, dated 03/12/1998.

2.2 Preliminary Bat Roost Assessment Survey

2.2.1.1 The Preliminary Bat Roost Assessment Survey was undertaken by Morgane Accault⁵ ACIEEM and Alice Rowe.

2.2.1.2 The building was subject to a detailed external inspection for signs of bats and nesting birds on 22nd January 2024. This involved searching the exterior of the building for signs of bats and nesting birds such as droppings and for potential bat roost locations and bird nest sites. The building was assessed in terms of its potential to support bat roosts using the following categories:

- Negligible potential.
- Low potential.
- Moderate potential.
- High potential.
- Confirmed roost.

2.2.1.3 The survey was undertaken outside the main bat survey season of May to August/September inclusive; at this time of year evidence of bats such as droppings may be removed from external areas by the actions of wind and precipitation. Externally, all parts of the building were accessed at ground level. Due to health & safety considerations (related to asbestos), it was not possible to undertake any internal inspections of the building. Given that there are no enclosed loft spaces, the lack of internal inspection is not considered to be a significant constraint.

2.2.2 Summary of Bat Evidence

2.2.2.1 No evidence of bats was observed during the survey.

⁵ Natural England Class Licence Registration No. 2022-11070- CL17 Survey Level 1.

2.2.3 *Overview of Surrounding Habitats*

- 2.2.3.1 The site is located at approximately 174 metres above sea level, in the centre of Golcar; approximately 3.7 km west of the town centre of Huddersfield, and approximately 800 metres north of the River Colne.
- 2.2.3.2 The site is located within a residential area. The site is bordered by grounds of mown amenity grassland with residential properties and small gardens to all sides. Extensive areas of woodland railway and main watercourses lie >500 metres south of the site.
- 2.2.3.3 Background disturbance levels appear to be low to moderate in the area; the site is surrounded by residential properties and away from main roads. The River Colne and woodlands further south of the site present some potential habitat connectivity features for bats. Overall, the immediate surrounding area provides low to moderate quality habitat for bats and low to moderate levels of background disturbance.

2.2.4 *Building Description*

- 2.2.4.1 See photos at Appendix 2. The surveyed building is a two-storey building from the 1970s. The building is of brick construction and the roof flat. The building extends to approximately 75 metres long at its longest axis. The building comprises two main parts each extending to approximately 44 x 15 metres and connecting via a third part extending to approximately 10 x 9 metres.
- 2.2.4.2 The external brickwork appears to be in good condition with no potential bat roost features noted within the brickwork.
- 2.2.4.3 The roof is flat with roofing material overlapping the top part of the brick walls. All along the building several gaps between the roofing material and walls are present, providing potential bat roost features. Aside from the roof verges, no other potential bat roost features were identified.
- 2.2.4.4 In conclusion, potential bat roost features were identified at multiple locations around the building. Due to the surrounding habitat of low to moderate quality for bats and the low to moderate levels of disturbance together with the nature of the potential bat roost features, it is concluded that the building has low bat roost potential.

2.3 *Nesting Birds*

- 2.3.1.0 No bird nests were observed during the survey on 22nd January 2024. Based on the nature of the building and its location, it is considered that there is low potential for birds to nest at the building, e.g. on the flat roof and/or in the gaps between roof verges and walls. Birds could also nest in shrubs within the site.

3 Precautionary Working Method Statement

3.1.1.0 This section presents the Non-Licensed Precautionary Working Method Statement (PWMS) for Bats for this project. This PWMS for Bats has been prepared in accordance with Section 6.10 of the Bat Mitigation Guidelines³.

3.1.1.1 Section 4 below sets out the protocol to be implemented in the event that a bat is found during the work (Emergency Measures).

3.1.1.2 The failure of anyone working on this project to follow this PWMS may result in a breach of the law and leave the client or others open to prosecution.

3.2 *Responsible Persons*

3.2.1.1 The Site Manager will be responsible for ensuring that this PWMS is adhered to.

3.2.1.2 A Bat Licensed Ecologist will provide the Toolbox Talk and will directly supervise all works affecting Potential Bat Roost Features (PRFs). The Bat Licensed Ecologist will hold a valid current Scientific Bat Survey Licence issued by Natural England.

3.2.1.3 The Bat Licensed Ecologist reserves the right to stop works if this PWMS is not being adhered to and to contact the police if they believe that an offence has been committed.

3.3 *Toolbox Talk*

3.3.1.1 Prior to the start of any work affecting PRFs, the Bat Licensed Ecologist will provide all site personnel with a Toolbox Talk which detail the following:

- The activities that require supervision by a licensed bat worker.
- How to recognise a bat; what to do if a bat is found during work (notably for unexpected discoveries when a licensed bat worker is not present); what to do/record if droppings are found.
- Methods to minimise killing and injury (e.g. removing roofing material by lifting away and not sliding to avoid injuring bats that may be underneath; checking on the underside prior to stacking/disposal to ensure no bats are clinging to the underside).
- Methods to minimise disturbance (including timing restrictions).
- Lighting restrictions.

3.4 *Careful Dismantling of Potential Bat Roost Features (PRFs)*

3.4.1.1 Prior to the start of dismantling works, the Bat Licensed Ecologist will undertake an update inspection of the building to confirm the location of all PRFs. The Bat Licensed Ecologist will walk the site with the Site Manager to ensure that the Site Manager is fully aware of locations where bats could be found.

- No dismantling of PRFs will be undertaken within 48 hours (either actual or forecast) of overnight temperatures below 0°C (due to the risk of hibernating bats).
- All dismantling of PRFs will be undertaken using hand-tools only.
- All dismantling of PRFs will be undertaken only under the direct supervision of a Bat Licensed Ecologist.
- Bats must not be handled by anybody other than the Bat Licensed Ecologist.

3.5 *Programme*

3.5.1.1 The proposed work is due to be undertaken ASAP (i.e. March/April 2024) due to the health and safety concerns. If there are delays beyond 1st May 2024, a Dusk Emergence Bat Survey will be undertaken in order to determine the presence/absence of bat roosts at the site.

4 Legal Compliance Protocol (Emergency Measures)

4.1.1.0 This section sets out the protocol to be implemented in the event that a bat is found during the work.

4.2 *Bats*

4.2.1.1 If a bat or evidence of a bat (e.g. droppings) is found, the Bat Licensed Ecologist will adopt the protocol detailed in Section 6.10 of the Bat Mitigation Guidelines³ which is summarised as follows:

4.2.1.2 All work must stop immediately and the Bat Licensed Ecologist will advise on the most appropriate course of action. This would depend on the exact circumstances and the judgement call of the Bat Licensed Ecologist on site. For example, it may be appropriate for the bat's welfare to remove the bat; or conversely to re-instate the roost.

4.2.1.3 If the Bat Licensed Ecologist decides to remove the bat for welfare reasons, they will assess the bat and care for it appropriately until it can be released, as appropriate. In this event, no work can be done on site until either a European Protected Species Mitigation (EPSM) licence has been granted for the project or the Bat Licensed Ecologist has confirmed that certain works can proceed without an EPSM licence.

4.2.1.4 In the very unlikely event that a bat is found unexpectedly, when the Bat Licensed Ecologist is not present, the following protocol is to be adopted:

- Stop work immediately and contact the Bat Licensed Ecologist immediately.
- The bat must not be exposed or 'encouraged' to fly out of the roost of its own accord. It should be left undisturbed unless this would be unsafe.
- Unless it is in immediate danger, the bat must only be handled by the Bat Licensed Ecologist. If the bat is in immediate danger it should be carefully placed (with gloved hands) in a lidded ventilated box with a piece of clean cloth and a small shallow container with some wetted cotton wool. The box must be kept in a safe, quiet location.
- The Bat Licensed Ecologist will re-assess the location where the bat was found and determine whether works can continue.
- Gloves must be worn when handling bats.
- If the Bat Licensed Ecologist cannot attend site immediately, call the National Bat Helpline (0345 1300 228) to be put in contact with a bat carer. If there are none, then a local wildlife rescue centre or vet may take the bat.

4.2.1.5 An EPSM licence is required to allow an activity to occur that would otherwise be classed as unlawful e.g., damage/destruction and/or disturbance of a bat roost. Natural England can issue bat EPSM licences for this purpose on application and presentation of evidence-based mitigation. Before issuing a licence, Natural England will need to be satisfied that the following '3 tests' are met (this will include measures to minimise impacts on bats through design / mitigation / timings etc.):

- That the action is for the purpose of preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature;
- That there is no satisfactory alternative; and
- That the action authorised will not be detrimental to the maintenance of the species concerned at a favourable conservation status in their natural range.

4.3 *Nesting Birds*

4.3.1.1 If an active bird nest is found, it will be retained in situ undisturbed until the nest is no longer in active use. A nest is classed as active when it contains eggs or chicks and when it is being built.

Appendix 1. Legislation Context

Bats

Bats are fully protected through The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 as European Protected Species (EPS). They also receive some protection through inclusion in Schedule 5 of the Wildlife and Countryside Act 1981 (as amended).

It is an offence to deliberately capture, injure or kill a bat. It is an offence to damage or destroy a breeding site or resting place of a bat. It is an offence to deliberately disturb a bat; in particular any disturbance which is likely (a) to impair their ability - (i) to survive, to breed or reproduce, or to rear or nurture their young, or (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or (b) to affect significantly the local distribution or abundance of the species to which they belong.

Under the Wildlife and Countryside Act 1981 (as amended), it is also an offence to intentionally or recklessly disturb a bat while it is occupying a structure or place which it uses for shelter or protection; or obstruct access to any structure or place which any such animal uses for shelter or protection.

The 'appropriate authority' (Natural England in England) has powers to issue licences for various purposes including - (a) scientific or educational purposes... and (e) preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment. The appropriate authority shall not grant a licence under this regulation unless they are satisfied - (a) that there is no satisfactory alternative, and (b) that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range. It is an offence for any person authorised by virtue of a licence to which this paragraph applies to contravene or fail to comply with any condition which the licence requires him to comply with.

Nesting Birds

All wild birds in the UK are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) which makes it an offence to intentionally kill, injure or take any wild bird or take, damage or destroy the nest (whilst being built or in use) or its eggs. Bird species listed in Schedule 1 of the 1981 Act, e.g. barn owl, receive further protection which makes it an offence to intentionally or recklessly disturb these species while building a nest or in, on or near a nest containing eggs or young; or to disturb dependent young of such a bird.