

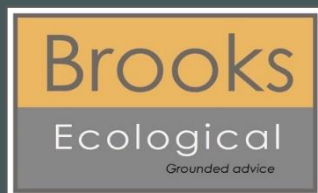


Bat Emergence Survey Report

Pheonox Textiles Ltd

23/07/2024

ER-7197-02



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| Report reference | ER-7197-02 |
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| Date | 23/07/2024 |
| 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

Survey has confirmed the likely absence of bats roosting at the Site.

Introduction

1. Subsequent to recommendations set out in the Preliminary Ecological Appraisal (Brooks Ecological May 2024) Brooks Ecological was commissioned to carry out an updating Bat Emergence Survey at the proposed development Site at Wood Street, Scissett.
2. Survey was required at the textiles facility which was assessed as providing features with low and moderate bat roost suitability. In accordance with current best practice guidelines, buildings of low suitability need a single evening emergence survey and buildings with a moderate suitability need two emergence surveys in order to confirm the presence or likely absence of roosting bats.

Figure 1 The surveyed buildings and suitability



Method

3. 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 (2023). However, these guidelines are not prescriptive, and we approach each site individually as required using our professional judgement and significant experience base.
4. In this case, 2 visits with a team of five and three surveyors was deemed necessary to fully evaluate the potential use of the Site for roosting.
5. Surveys were carried out with surveyors positioned around the building to cover all aspects where bats could potentially emerge or return, and to establish activity levels around the Site.
6. The surveyors, using heterodyne detectors and Echo Meter Touch 2s 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 1 below.

Table 1 Survey conditions.

| Date | Survey Type | Temp. Start/End | Weather |
|------------|-------------|-----------------|---|
| 12.06.2024 | Emergence | 11/10°C | Dry, clear, 20% cloud cover, Light breeze (B2). |
| 17.07.2024 | Emergence | 20/17°C | Dry, warm, 30% cloud cover, Light breeze (B2) |

7. Survey directed by Survey was directed by Chris Shaw BSc (Hons) MCIEEM. Chris has over 13 years' experience of carrying out bat surveys in a professional capacity and is registered to use the Class Survey Licence WML CL18 (Bat Survey Level 2) and Bat Mitigation Class Licence WML CL21 Annex B.

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.

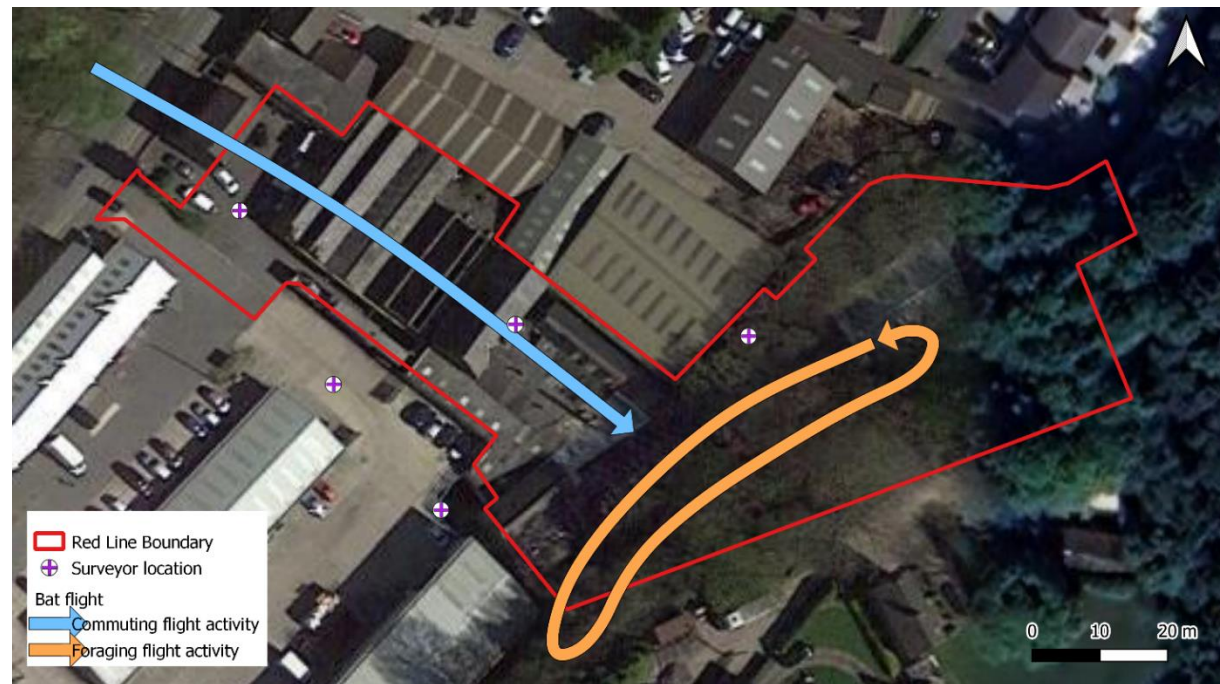
Where bats are found within a potential development site, a license from Natural England may need to be secured if works that could otherwise contravene legislation are to be carried out. These licences are only issued where Natural England is satisfied that works are unavoidable and would not have a 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.

Survey Results

Emergence - 12th June 2024 (sunset 21:36)

8. Surveyors were positioned so as to cover all features with moderate and low bat roost suitability, with one surveyor positioned inside the building looking out over the rooftops.
9. Overall, bat activity was considered to be very low, with only a handful of contacts being made by solitary bats.
10. The first contact was logged at 21:53 when a common pipistrelle was noted commuting south east across the Site to reach the wooded beck.
11. At 22:02 a solitary common pipistrelle was noted foraging along the wooded edge.
12. No roosts were identified, or suspected, within the surveyed building.

Figure 2 Summary of bat activity observed during emergence survey.



Survey Results

Emergence - 17th July 2024 (sunset 21:25)

13. Surveyors were positioned so as to cover all features with moderate bat roost suitability.
14. No bats were seen or heard on the survey.
15. No roosts were identified, or suspected, within the surveyed building.

Figure 3 Summary of bat activity observed during emergence survey.



Evaluation & Conclusion

16. Survey has demonstrated a likely absence of roosting within the survey building at Wood Street, Scissett, and as such, the proposed works present little risk of impacting upon bats or their roosts.

Standard Precaution

17. Although no evidence of roosting has been found and the likely absence of roosting has been concluded, it must be noted that bats frequently move between roost sites, can be very casual in their choice of roosting location, and can turn up unexpectedly at any time.
18. On this basis the developer should always be mindful of bats as a potential constraint and have a protocol in place should any bats be seen or suspected during works: works should stop, a suitably licenced ecologist consulted, and their advice followed.

Enhancement

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

References

Chartered Institute of Ecology and Environmental Management (CIEEM). 2019. *Advice note: on the lifespan of ecological reports and surveys*. Winchester: Chartered Institute of Ecology and Environmental Management. [Online]. Available from: <https://cieem.net/resource/advice-note-on-the-lifespan-of-ecological-reports-and-surveys/>

Collins, J. 2023. *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)*. London: The bat Conservation Trust.

Department for Levelling Up, Housing and Communities. 2023. *National Planning and Policy Framework*. London: Her Majesty's Government. [Online]. Available from: https://assets.publishing.service.gov.uk/media/65819679fc07f3000d8d4495/NPPF_December_2023.pdf

Government Circular 06/05: Office of the Deputy Prime Minister (ODPM) 2005. *Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within the Planning System*. London: Her Majesty's Government. [Online]. Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7692/147570.pdf

His Majesties Government. 2024. *Bat Licenses*. [Online]. [Accessed 15th January 2024]. Available from: <https://www.gov.uk/government/collections/bat-licences#bat-mitigation-licences>

His Majesties Government. 2024. *European Protected Species policies for mitigation licenses*. [Online]. [Accessed 15th January 2024]. Available from: <https://www.gov.uk/guidance/european-protected-species-policies-for-mitigation-licences>

Institute of Lighting Professionals (ILP) and Bat Conservation Trust (BCT). 2018. *Guidance Note GN08/23: Bats and Artificial Lighting At Night*. Rugby: Institute of Lighting Professionals. [Online].

Available from: <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

Mitchell-Jones, A.J. 2004. *IN136 Bat Mitigation Guidelines*. Peterborough: English Nature.

[Online]. Available from:

<https://webarchive.nationalarchives.gov.uk/ukgwa/20140605171643/http://publications.naturalengland.org.uk/publication/69046?category=31008>

Mitchell-Jones, A.J. and McLeish, A.P. 2004. *Bat Workers Manual (3rd Edition)*. Peterborough:

Joint Nature Conservation Committee (JNCC). [Online]. Available from:

<https://hub.jncc.gov.uk/assets/e5888ae1-3306-4f17-9441-51a5f4dc416a>

The Conservation of Habitats and Species Regulations 2010. (No. 490). London: Her Majesty's Government. [Online]. Available from:

<https://www.legislation.gov.uk/uksi/2010/490/contents/made>

The Royal Society for the Protection of Birds (RSPB). *Magenta Bat 4 (heterodyne) detector*.

[Online]. [Accessed 4th January 2024]. Available from: <https://shopping.rspb.org.uk/wildlife-friendly-garden/wildlife-garden-cameras-detectors/bat-detectors/magenta-bat-4-bat-detector.html>

Titley Scientific. 2024. *Anabat Scout Active Bat Detector*. [Online]. [Accessed 4th January 2024].

Available from: <https://www.titley-scientific.com/uk/anabat-scout.html>

Wildlife Acoustics. *Echo Meter Touch 2 Pro for Android*. [Online]. [Accessed 4th January 2024].

Available from: <https://www.wildlifeacoustics.com/products/echo-meter-touch-2-pro-android-2>

Wildlife and Countryside Act 1981. (c.69, Schedule 9). London: Her Majesty's Government.

[Online]. Available from: <https://www.legislation.gov.uk/ukpga/1981/69/schedule/9>