



# The Homestead, Hurst Knowle, Almondbury

Bat Emergence Survey Report

Highstone Building Services Ltd

27/06/2025

Report Ref. ER-8178-04

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<b>Date</b>	27/06/2025
<b>Report duration</b>	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.
<b>Records</b>	As good practise Brooks Ecological may submit records of bats found during this survey effort to the Local Ecological Record Centre, at/or after the time of planning application.



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## **Executive Summary**

The survey objectives were to ascertain the presence or likely absence of bat roosts at the proposed development site, and to characterise any roosts found.

An Emergence survey was carried out in June 2025, which identified a single small day roost within the eastern gable wall. This was occupied by two common pipistrelle bats.

Proposals are to demolish the building and redevelop the Site. This will result in the permanent loss of this roost. As such, a Mitigation Licence will need to be secured with Natural England, prior to works commencing.

Further survey will be required to collect a sufficient level of information for licencing purposes

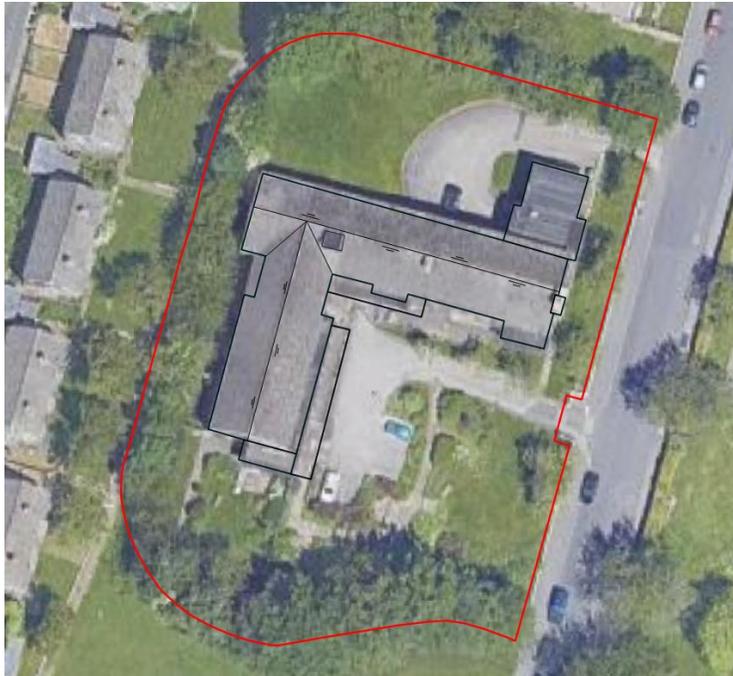
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## Introduction

1. Subsequent to recommendations set out in the Preliminary Roost Assessment, Brooks Ecological was commissioned to carry out a Bat Emergence Survey at the proposed development Site at The Homestead, Hurst Knowle, Almondbury.
2. The objective of the survey was to ascertain the presence or likely absence of bat roosts on-Site. Emergence survey was determined to be the most appropriate survey method to confirm presence or likely absence.
3. An analysis of the site context and desk study regarding records of Local bat populations has been carried out and is detailed within Brooks Ecological PRA Report ER-8178-01.
4. Within the above report the Site was assessed as providing features with low bat roost suitability; in accordance with current best practice guidelines, buildings of low suitability need a single evening emergence survey to confirm the presence or likely absence of roosting bats. The Survey extent can be seen in Figure 1, below.

**Figure 1** The surveyed building - red line



## Methods

5. Surveys were directed by Christopher 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.
6. Brooks Ecological specialises in bat surveys ranging from individual buildings through to complex sites requiring numerous visits with large teams. The survey effort, number of personnel and number of visits required to be able to properly evaluate the building(s) use by bats is informed by findings of Brooks Ecological Preliminary Roost Appraisal. We also 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.
7. In this case, a single visit with a team of seven surveyors was deemed necessary to fully evaluate the potential use of the Site for roosting.
8. 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.
9. The surveyors 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.
10. Emergence survey was undertaken in June, during optimal survey conditions. Survey conditions are summarised below/overleaf:

**Table 1** Survey Conditions (recorded from Met Office Weather Map at time of survey).

Survey	Date	Sunset	Ambient Conditions	Invertebrate Activity
1	23/06/25	21:42	16-15°C; no precipitation; wind (B1 - B2); 100% cloud	Moderate

## **Equipment**

11. Brooks Ecological makes use of the most appropriate combination of the following equipment during emergence surveys. Where applicable the equipment has been last calibrated in February of 2025.
  - Heterodyne detector: Magenta Bat 4
  - Full spectrum detector: Titley Scientific Anabat Scout or EM Touch 2 Pro
  - Night vision aids: Nightfox, Thermal Eye T2Pro, FlirOne for iOS, Flir Ax5
  - Remote detector: Wildlife Acoustic Song Meter SM4 Bat FS
12. A still shot from night vision aids used, showing the field of view at the darkest point of the survey, has been included in reporting.

## **Limitations**

13. The survey was completed during optimal survey condition and time of year. Access was possible around all aspects of the building.

**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 Survey 1

- 14. Surveyors were positioned to cover all features with bat roost suitability.
- 15. Overall, bat activity was low, with only a handful of contacts being made, primarily by solitary bats.

**Table 2** Summary of bat activity recorded during the emergence survey.

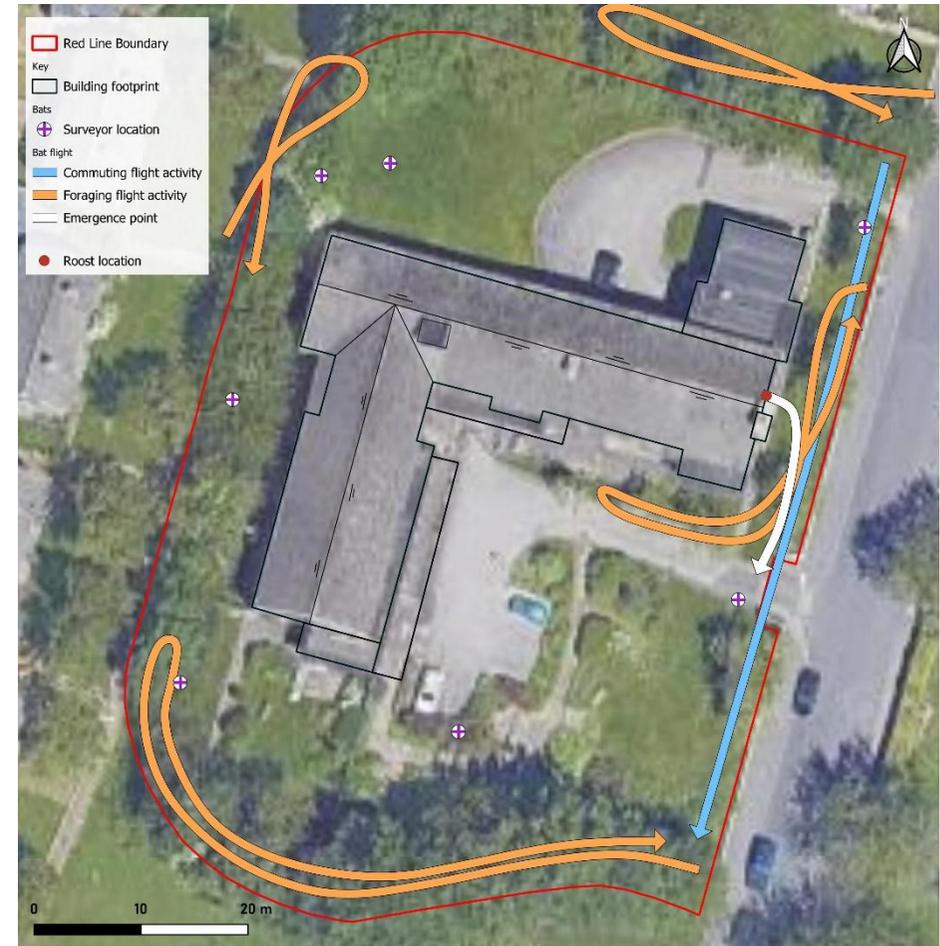
Time	Species	Notes
21:59	C. Pipistrelle	Foraging heard but not seen offsite to the NE.
22:02	C. Pipistrelle	Bat emerges from verge of western gable end wall and then forages along eastern boundary for several minutes. A second bat emerges from the same location at 22:12.
22:07	C. Pipistrelle	Sustained foraging along southern and western tree line from this point onwards, until the end of the survey. A maximum of two bats recorded at any one time.

- 16. The survey was concluded at 22:45 when patterns of activity around the Site had been discerned and all species could have emerged.

**Figure 2** Screenshot from NVA (NightFox IR)



**Figure 3** Summary of bat activity observed during emergence survey.



## Conclusion

17. A single evening emergence survey, undertaken in the peak season, has confirmed the presence of a single small day roost, occupied by up to two common pipistrelle bats, which is located at the wall tops of eastern gable end wall; see figure adjacent.
18. The presence of larger roosts elsewhere on Site is not suspected. Current survey information is considered sufficient for planning purposes.
19. Survey has shown that the roost is used by low numbers of common species of bat and, although legally protected, the roost would be assessed by Natural England as being of 'low conservation significance'.

## Recommendations

20. Any potential disturbing works to the roost will require a licence from Natural England to be in place before commencement to derogate offenses that will arise through disturbance or destruction of the roost. This may be a Bat Mitigation Class Licence (BMCL) or European Protected Species Mitigation Licence (EPSML).
21. The license will stipulate specific mitigation strategies that address the impacts outlined above. These may include (but are not limited to) installation of alternative roosting features (e.g. Integrated bat boxes), toolbox talks by a suitably licensed ecologist, supervision of works by a suitably licensed ecologist and a sensitive lighting plan for during and post development.

### Standard Precaution

22. 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.
23. 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.

**Figure 4** Location of roost identified during Survey 1



## Natural England Licence

24. 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?

25. Not yet - a single presence/ absence survey has been undertaken during the peak season by a team of experienced and licensed surveyors using suitable teams of assistants and equipment.
26. The exact location of the roost has 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, two further surveys are 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?

27. No, planning permission is currently being sought.
28. 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 as outlined in The Conservation of Habitats and Species Regulations 2010?

- (i) FCS Test (Regulation 53(9)(b) - Can the favourable conservation status of bats be protected?
29. 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?
30. 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.
31. 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?

32. Yes - The buildings in their current state are clearly not fit for habitation and the development of the Site for a new residence completed to modern standards could not accommodate the retention of the roost building.
33. 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

34. Natural England will require mitigation for the licensed (BMCL) loss of this roost. This could include integral bat boxes being incorporated into the new build. An interim bat box 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 roost.
35. In terms of the demolition programme, the following method should be agreed under license 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 section of 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 box will be installed prior to refurbishment of the roost building.
  - Once, and only once, a licence is in place will any works to the identified roost building commence.
  - 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 box mounted on a nearby tree or building.
  - Once the ecologist has confirmed in writing that bats are absent, refurbishment of the roost building can be completed.
  - Permanent roost features will then be built into the fabric of the new build, and its correct installation confirmed by the named Ecologist.

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