39A Beckett Rd, Dewsbury

PRELIMINARY BAT ROOST ASSESSMENT

December 2024

KNIGHT SKY ECOLOGY
PRACTICAL ECOLOGY SOLUTIONS

E: info@knightskyecology.co.uk

W: www.knightskyecology.co.uk

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KNIGHT SKY ECOLOGY LTD

Email: info@knightskyecology.co.uk

Web: www.knightskyecology.co.uk

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1 INTRODUCTION

1.1 Instruction and Report Aims

Knight Sky Ecology Ltd was commissioned to undertake a preliminary bat roost assessment of 39A Beckett Rd, Dewsbury, WF13 2DD. The assessment was undertaken in relation to the proposed development plans for the property. Details of the proposals were being finalised at the time of the assessment.

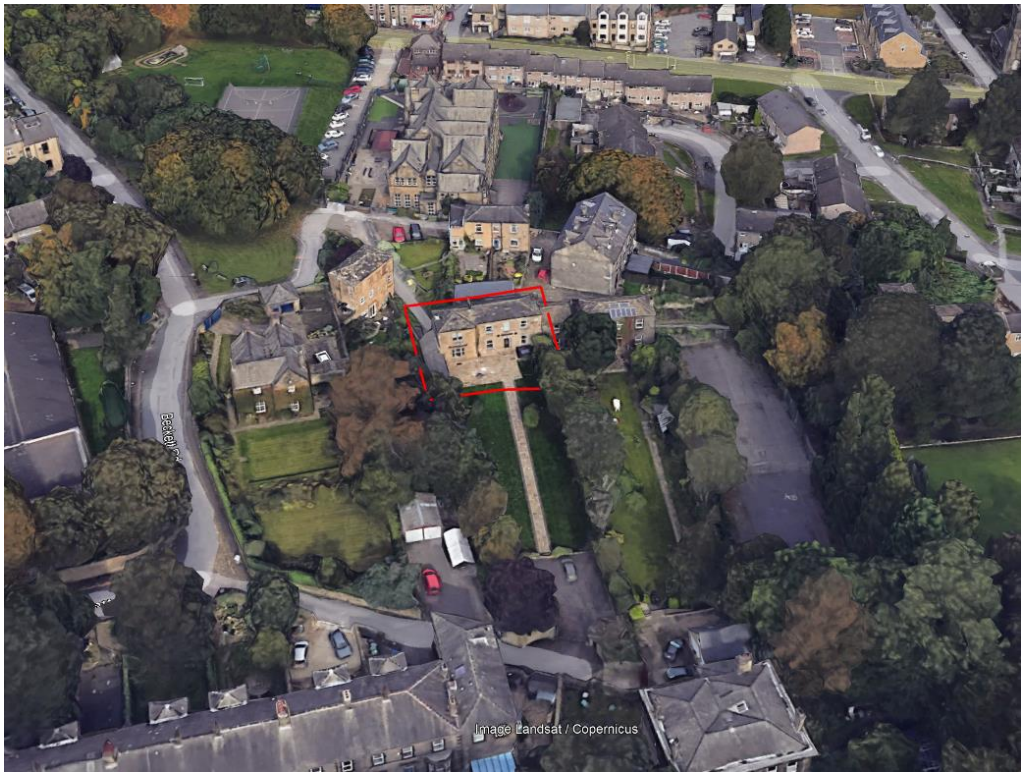
The aim of this report is to inform the proposals of all considerations relating to bats. This includes an assessment of the likelihood of the presence or absence of a bat roost at the property; the detailing of measures to mitigate any potential impacts to bats where appropriate; and, the provision of guidance should any further detailed assessment be required. Appendix A provides details of the legislation afforded to bats for further context.

In addition to bats, other potential ecological constraints to the proposal (e.g., nesting birds) was also documented where found.

1.2 Site Description

The property is located 1km north of the centre of Dewsbury at grid reference SE 24001 22674. It has a large front garden and is bound by similar properties on all sides. There is a park with broadleaved woodland 100m south. The surrounding area is largely urban with several parklands and other recreational spaces. This includes Caulms Wood Park located 690m east. Figure 1.1 provides an aerial image of the property location.

Figure 1.1. Property location



2 METHODS

2.1 Desk Study

Data Search Request

West Yorkshire Bat Group (WYBG) was requested to carry out a data search for bat records within a 2km radius of the property.

Online Resources

The 'Granted European Protected Species Applications' dataset in respect of bats was searched with use of the Multi-Agency Geographic Information for the Countryside (MAGIC) website (https://magic.defra.gov.uk) to identify bat roost records within 2km of the property.

2.2 Survey Personnel

The preliminary bat roost assessment was undertaken by Ryan Knight MCIEEM who holds a Level 2 Natural England Class Licence for bats (ref. 2015-12611-CLS-CLS) and has held this licence for over 12 years. Ryan has also acted as the named ecologist on numerous European Protected Species (EPS) mitigation licences issued by Natural England (NE) which covered several bat species and roost types including maternity, hibernation and day roosts.

2.3 Overarching Guidance

The preliminary bat roost assessment was primarily based on the methods described in '*Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). Bat Conservation Trust, London.' (Collins, J., (ed.) (2023).* Any deviation from standard practice is justified where required.

2.4 Site Visit

A preliminary bat roost assessment of the property was undertaken on 5th November 2024. The assessment involved a visual inspection of the property to search for bats and evidence of bats (e.g., droppings) and an appraisal of the extent and suitability of any potential bat roost features present. The assessment included the use of a torch and ladders. A digital endoscope was available for use but not required. The interior and exterior of the building (including loft) was comprehensively inspected.

Other considerations which would influence the suitability of the property for use by bats were also taken into account. This included the site location, environmental conditions including expected night time lighting levels and the suitability of the surrounding habitats. This information was gathered from the site survey and web-based mapping sources (i.e., Google Earth).

Following the assessment, the building was assigned a bat roost suitability category of none, negligible, low, moderate, high or confirmed roost based on the collated information.

2.5 Assessment Comments

The assessment was undertaken outside of the main active season for bats (April to October inclusive) when signs of a bat roost are not as readily identifiable within this period. Bats do switch roosts, particularly between summer and winter months, and therefore may not be present within a property during the winter months.

However, bat droppings, particularly within internal spaces or under sheltered exterior locations, can still persist long after bats have left the roost. The main aim of the assessment was to assess the suitability of the property for bats - not to determine presence or absence.

The property was fully accessed throughout and no limitations to the site survey were encountered.

This report will remain valid for a period of 18 months from the date of issue. An ecologist should be contacted for advice on the revalidation requirements of the report if planning permission is not obtained (if required) or works do not commence within this time period.

3 RESULTS

3.1 Desk Study

WYBG Data Search

WYBG provided 18 records of bats within the 2km search radius. The records were dated between 1997 and 2007 and comprised common pipistrelle and pipistrelle species records along with nine records of unidentified bat species (Vesper bats). Several roost records were provided. The nearest record to the property was a 'casualty' originating from a property 75m south. Casualties are injured / grounded bats that have been found by the general public. They are not necessarily associated with a bat roost. Table 3.1 provides an overview of the records.

Table 3.1. WYBG Bat Records

Grid Ref	Location Name	Date	Common Name	Abundance	Record Type
SE236223	Trafalgar Road	19/10/1997	Pipistrellus		Roost (possible)
SE2266921571	3 Meadow Bank, Dewsbury, WF13 3SL	19/07/2001	Pipistrellus		Roost (possible)
SE2400722599	The Stables, Marlborough Terrace, Dewsbury, WF13 2DA	22/07/2001	Pipistrellus	1 Count of Adult	Casualty
SE2377322815	Carr Cottage, Upper Road, Dewsbury, Kirklees	21/06/2005	Pipistrellus		Roost
SE24592256	176 Crackenedge Lane, Dewsbury, Kirklees	30/08/2005	Pipistrellus	1 Count of Adult	Grounded
SE2263623241	60 Occupation Lane, Kirklees	07/07/2003	Common Pipistrelle		Roost
SE237209	Gate Inn, Thornhill Road, Dewsbury	23/08/2010	Common Pipistrelle		aural bat detector
SE252228	Dewsbury SE252228	01/08/2004	Pipistrelle Bat species		auditory record
SE2562221998	5 Lincoln Road, Dewsbury	22/08/2006	Pipistrelle Bat species	1 Count of Adult	caught
SE236223	2-12 Trafalgar Rd, Dewsbury	25/06/1997	Vesper Bat species	Not Recorded Range	Roost (possible)
SE2258923245	46 Occupation Lane, Staincliffe, Dewsbury, WS13 4BP	01/09/1998	Vesper Bat species	Not Recorded Range	Roost (possible)
SE2267121912	Kirklees, 87 Heckmondwike Road, Dewsbury	03/01/2002	Vesper Bat species		Roost (possible)
SE2328821731	Kirklees, 138 Boothroyd Lane	16/07/2002	Vesper Bat species	not recorded Range	Roost (maternity)
SE25372308	27 Eskdale Close, Wakefield	07/06/2003	Vesper Bat species	1 Count of Adult	Injured
SE2270021714	15 Nook Walk, Dewsbury, WF13 3ST, Kirklees	29/07/2004	Vesper Bat species	25 Count of Adult	Roost
SE23872229	Residential Home, 2 Oxford Road, Dewsbury, Kirklees	21/08/2004	Vesper Bat species	1 Count of Adult	in building
SE25052329	47 Mill Lane, Hanging Heaton, Batley	10/09/2006	Vesper Bat species	1 Count of Adult	Injured
SE2343522800	St Joseph's School, Heald's Road, Dewsbury	02/07/2007	Vesper Bat species		Roost

European Protected Species (EPS) Mitigation Licenses

The following EPS mitigation licence for bats was identified within the 2km search radius:

- Ref. EPSM2011-3454. Common pipistrelle. Destruction of a resting place. SE23412289 (800m north-west).

3.2 Site Survey

Building Description and Potential Bat Roost Features

Photos of the property are provided in Appendix B for a general overview and supporting information for the assessment.

The property comprised a two-storey, stone-built dwelling. The stonework of the property had been repointed and repaired relatively recently. A very narrow section of the stonework on the south-east corner had not been pointed and there did appear to be crevices in the stonework. However, upon further inspection, these crevices appeared shallow and filled broken mortar and detritus.

The frontage (south) featured cornice stones all along the roof verge. The guttering sat upon this stonework and there did not appear to be any roost access points all along the roof verge. The guttering on the rear (north) elevation was obscuring the roof verge and no potential roost features were identified. The main section of the house had a hipped roof which featured traditional stone slates. The pitch of the roof was notably shallow. The ridge tiles of the roof appeared well-bedded in and the pointing mortar appeared solid. As is typical of such roof types, there were numerous crevices within the roof due to slightly lifted and misshapen tiles. Such features can provide roosting opportunities for individual bats. Internally, the loft of the property had recently been boarded out and lights had been fitted along the entire ridge. Due to the shallow pitch, the loft height was shallow (approximately 1.2m). The roof had a traditional, bitumen based, underlining. No light gaps were observed throughout the loft.

There was a single storey extension on the south-west side. This extension appeared to be in very good repair and no potential roost features were identified. There was a further two-storey extension on the east side which was of a similar construction and condition as the house. However, this section was privately owned and will not form part of the development proposal.

Habitat Description

The property contains a large front garden which is bound by tree lines and hedgerows. To the south of the garden is a parkland which contains an area of broadleaved woodland. This woodland will provide a notable foraging feature for bats in the locality. There are also a notable number of individual urban trees and tree lines in the area. Such features will provide some foraging value for bats. However, the property is located towards the centre of Dewsbury and within an urban location. Bat species less tolerant of such urban environments (e.g., Myotis bats) are much less likely to be present. Common pipistrelle is the most likely species to be encountered and overall, bat activity levels within the immediate area of the property are expected to be low, largely due to the urban location.

Evidence of Bats and Bat Roost Suitability

No bats or evidence of bats was recorded. A comprehensive, close visual inspection was completed both externally and internally.

Potential bat roost features were restricted to crevices between the roof slates. Photo 3.1 provides a general example of these features. In relation to the findings of the preliminary bat roost assessment, the property was categorised as **low roost suitability.**

Photo 3.1. Roof of the property with shallow crevices underneath the stone slates.

3.3 Nesting Birds

No evidence of birds' nests was observed. The likelihood of a nest site being present in the property is considered to be low.

3.4 Other Considerations

No other potential ecological constraints to the plans were encountered.

4 EVALUATION & CONCLUSIONS

4.1 Bat Roost Suitability Evaluation

No evidence of a bat roost was encountered and a sufficiently thorough inspection of the property was carried out. The property was categorised as low in its suitability to support bats.

Low suitability is defined by the following description:

- '*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 larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation*)' (Collins, 2023).

All potential roost features were within the roof with shallow crevices under the roof slates. This is a typical finding for such roof types. It is considered that the (low) residual risk of encountering a bat roost can be easily reduced via the adoption of standard, good practice mitigation measures. Such measures are detailed in Section 5.

Therefore, in consideration of the findings and given the fact that a thorough examination was completed, it is the professional judgement of Knight Sky Ecology that no further detailed assessment is required (i.e., dusk emergence survey).

Bats do not present a constraint to the development proposals as the works will remain legally compliant i.e., the proposed activities are reasonably unlikely to result in an offence listed under Section 43 of the Conservation of Habitats and Species Regulations 2017 or Section 9 of the Wildlife and Countryside Act 1981 (see Appendix A).

4.2 Nesting Birds

Whilst no direct evidence of nesting birds was observed, the property is considered suitable to support nest sites. The proposed development should therefore be aware of the legislation afforded to 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.

The nesting bird season is generally accepted as March to September. Mitigation to avoid impacts to nesting birds is detailed in Section 5.

5 RECOMMENDATIONS

5.1 Bats

Precautionary Mitigation

The following mitigation measures for the development works are recommended:

- There are no restrictions in the timing of the development work within regards to bats.
- Before works commence, the development contractor is to liaise directly with a licensed ecologist to discuss the development schedule for proposals and the mitigation procedures that are required for bats. The ecologist will provide a toolbox talk to the contractors in order to explain the presence of bats, their legal protection, roles and responsibilities, the proposed method of working, basic identification of bats and procedures should bats or evidence of bats be found.
- The roof slates are to be carefully removed by hand and the area underneath is to be fully checked for bats and evidence of bats.
- In the unexpected event that a bat is discovered during the works, the contractors will be advised to stop immediately and contact the licensed ecologist whom will travel to site to provide assessment and advice. Contractors will be specifically forbidden to handle bats. Contractors will be advised that if it is necessary to remove a bat to avoid it being harmed, gloves MUST be worn. It should be carefully placed in a cardboard box and kept in the dark in a quiet place until the licensed ecologist arrives on site.
- If the licensed ecologist assesses that the continuing works are, on balance, likely to result in contravention of the legislation afforded to bats (see Appendix A), the works would stop and a Natural England mitigation licence will be sought. Such a licence would require further detailed assessments.

Enhancements

The proposed development presents a good opportunity to deliver enhancements for bats at the site. Details of the bat box recommended to be installed are provided in Table 5.1.

Figure 5.1. Bat box recommendations

<table>
<tr><th colspan="4">BAT BOX</th></tr>
<tr><td>Locations and positioning</td><td colspan="3">The box can be fitted on the walls of the building at a height of at least 3m from the ground. It must be sited outside of any external lighting.</td></tr>
<tr><td>Bat box models and purchasing</td><td colspan="3">Bat box models along with the locations for purchasing are provided below. There can be a considerable waiting time for delivery for certain models, therefore, two options have been provided.

<table><tr><td>Vivara Pro Chillon Low Profile WoodStone Bat Box</td><td>  </td><td>Available from: https://www.nhbs.com/</td></tr><tr><td>Beaumaris Woodstone Bat Box</td><td>  </td><td>Available from: https://www.nhbs.com/</td></tr></table></td></tr>
<tr><td>Maintenance</td><td colspan="3">The models chosen do not require cleaning as bat droppings do not typically accumulate within these types of boxes to a level likely to cause problems for future habitation.</td></tr>
</table>

5.2 Nesting Birds

Precautionary Mitigation

Any works which will potentially impact bird's nests should be undertaken outside of the main nesting bird season of March to August (inclusive). If this is not possible, any works potentially affecting bird's nests must be preceded by a nesting bird check, undertaken by a suitability qualified ecologist. If an active nest is found, it must be left in-situ until no longer in use.

APPENDIX A. LEGISLATION FOR BATS

The Wildlife and Countryside Act 1981

All bat species in England are listed in Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). Section 9 of the Act make it an offence to intentionally or recklessly kill, injure or take any wild animal included in Schedule 5. In addition, it is an offence to (intentionally or recklessly):

- Damage or destroy any structure or place which any wild animal specified in Schedule 5 uses for shelter or protection;
- Disturb any such animal 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 Conservation of Habitats and Species Regulations 2017

Bats are listed within Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations) as European Protected Species of animals. Part 3 (Protection of animals); Regulation 43 (1) of the Habitats Regulations make it an offence to:

- Deliberately capture, injure or kill any wild animal of a European protected species;
- Deliberately disturb wild animals of any such species;
- Deliberately take or destroys the eggs of such an animal; or
- Damages or destroy a breeding site or resting place of such an animal.

For the purposes of the legislation, the disturbance of wild animals includes any disturbance which is likely to impair their ability to survive, to breed or to reproduce, or to rear or nurture their young; or in the case of hibernating or migratory species, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species to which they belong.

Where it is likely that a proposed scheme would result in contravention of this legislation, a European Protected Species mitigation licence would be required to allow the works to proceed. As part of this process, the application must meet 'three tests' for licensing under the Conservation of Habitats and Species Regulations 2017 (as amended). Planning guidance and case law also confirm that local authorities have a statutory duty under the Regulations to have regard to these three tests when deciding whether to grant planning permission. The three tests are as follows:

- Regulation 55 (2) (e) states that a derogation licence can only be issued for 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;
- Regulation 55 (9) (a): that there is no satisfactory alternative; and
- Regulation 55 (9) (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.

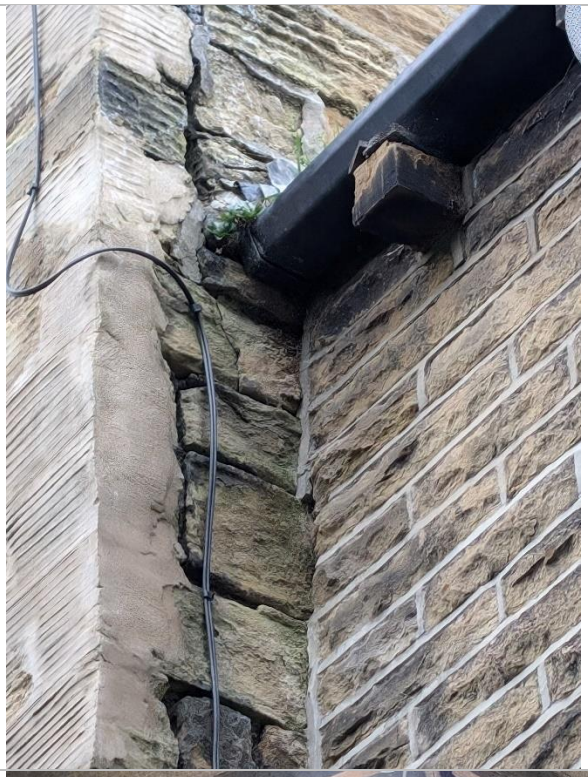
Natural Environment and Rural Communities (NERC) Act 2006

Section 41 of the NERC Act 2006 requires the Secretary of State to publish a list of the living organisms and types of habitats which in the Secretary of State's opinion are of principal importance for the purpose of conserving or enhancing biodiversity. The Section 41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in their duty to further the general biodiversity objective when exercising their functions, under Section 40 of the NERC Act 2006. This is also referred to as a 'biodiversity duty' which was strengthened by the Environment Act 2021. Bat species known to be present in the north of England and included on the Section 41 list comprise soprano pipistrelle, noctule and brown long-eared bat.

APPENDIX B. PHOTOS

Photo 1 Front (south) elevation.	
Photo 2 View of roof verge on front.	

Photo 3 Rear (north) elevation and west gable.	
Photos 4 Rear (north) elevation and east gable.	

Photo 5. Shallow crevices in south-east corner of stonework (suboptimal bat roost features).	
Photos 6a – 6b. Loft of property.