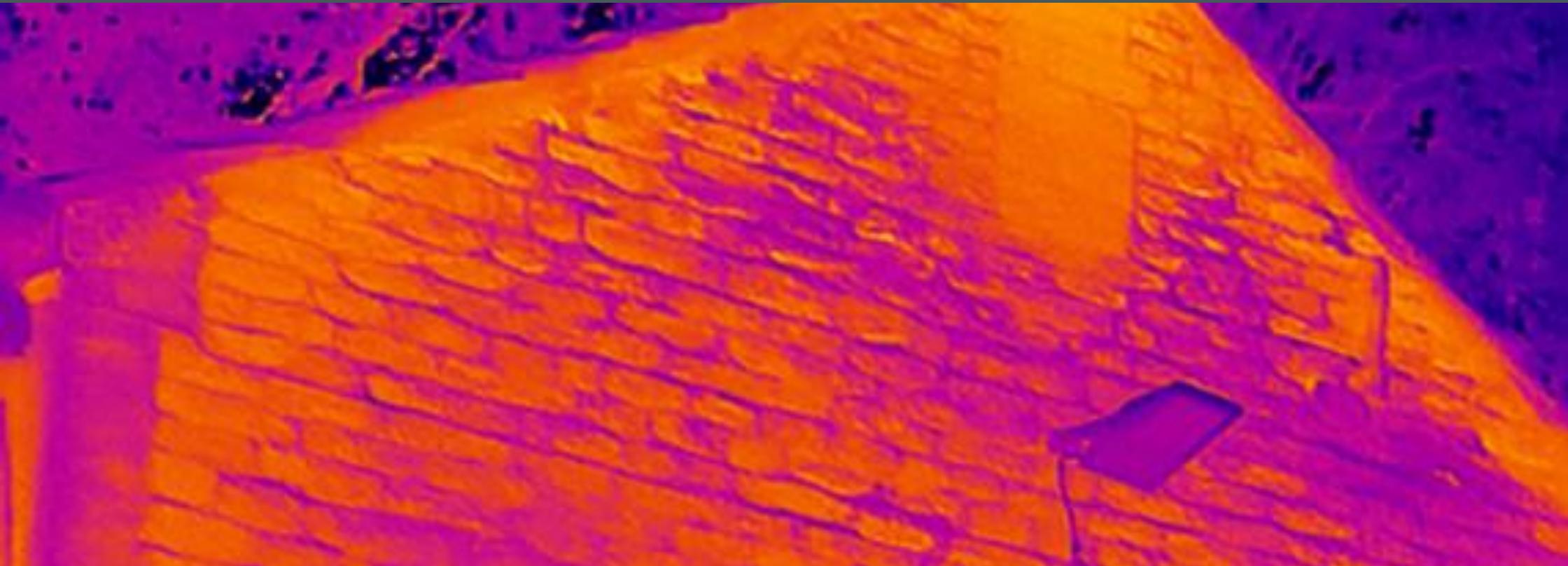


Brooks

Ecological
Grounded advice

The Priory, Cleckheaton



Bat Emergence Survey Report

Highstone Homes Ltd

29/07/2025

Report Ref. ER-8126-01

| | |
|-------------------------|--|
| Report reference | ER-8126-01 - Bat Emergence Survey Report |
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| Date | 29/07/2025 |
| 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. |
| Records | 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.

Three emergence surveys were carried out in the peak season, which identified a single day roost, occupied by a maximum of four common pipistrelle bats.

Proposals include removal of the building to facilitate development - this or any other potential disturbing works to the building will require a licence from Natural England to be in place to derogate offenses that will arise through destruction of the roost.

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Introduction

1. Subsequent to recommendations set out in the Preliminary Ecological Appraisal carried out by Collington Winter Environmental Ltd, Brooks Ecological was commissioned to carry out a Bat Emergence Survey at the proposed development Site at The Priory, Cleckheaton.
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 Collington Winer Environmental Report CW20-2543 RPT 002.
4. Within the above report the Site was assessed as providing features with high and moderate bat roost suitability; in accordance with current best practice guidelines, buildings of moderate suitability need two evening emergence surveys, and high suitability buildings need three, 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 - highlighted in grey



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 Collington Winter Environmental Ltd Preliminary Ecological 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, two visits covering both onsite buildings using a team of five surveyors and a final visit to just building 1 with a team of four 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 surveys were undertaken in June and July 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 | 16/06/2025 | 21:38 | 18°C; 75% humidity; no rainfall; B1; 0/8 okta | High |
| 2 | 07/07/2025 | 21:38 | 14-13°C; 77% humidity; no rainfall; B4; 0/8 okta | Low |
| 3 | 28/07/2025 | 21:12 | 16/15 °C; 66% humidity; no rainfall; B1; 2/8 okta | Low |

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: EM Touch 2 Pro
 - Night vision aid: Thermal Eye T2Pro and Pixfra Arc-613
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.

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

13. Surveyors were positioned to cover all features with bat roost suitability.
14. Overall, bat activity was considered to be low by sustained, with up to three bats foraging consistently for much of the survey.
15. The first bat was a common pipistrelle seen foraging over Building 1 at 21:50.
16. From 21:57 until the end of the survey up to three common pipistrelle were seen foraging around the two buildings and under the trees along the driveway until the end of the survey.
17. At 22:06 a single common pipistrelle emerged from beneath tiles on the verge of the eastern elevation of Building 1 (Roost 1).
18. At 22:08 a noctule was recorded foraging around the trees along the western edge of the Site.
19. 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 of roost location from thermal camera.

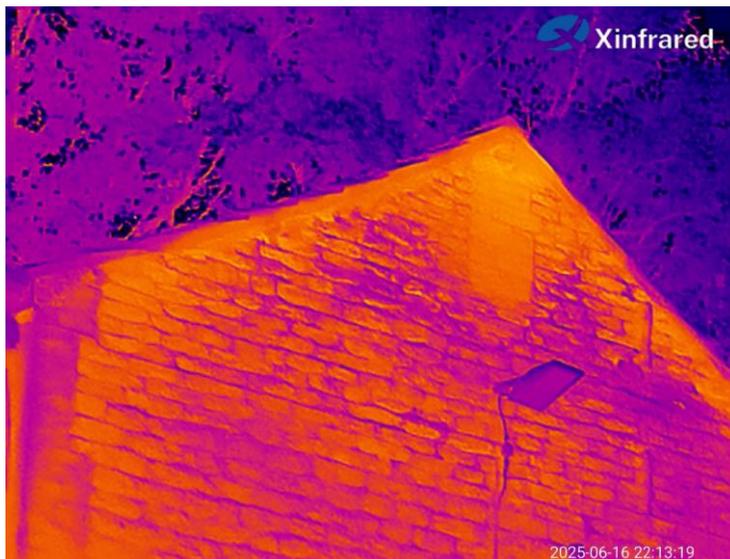


Figure 3 Summary of bat activity observed during emergence survey.



Emergence Survey 2

20. Surveyors were positioned to cover all features with bat roost suitability.
21. Overall, bat activity was similar to the first survey, with up to four bats foraging consistently for much of the survey.
22. The first bat was a common pipistrelle seen commuting over the building at 22:59. Common pipistrelle were seen foraging continuously from 22:08 until the end of the survey all around the buildings and beneath the trees surrounding the Site.
23. Starting at 22:00 and concluding at 22:24, a total of four common pipistrelle bats were seen to emerge from the Roost 1 identified in the previous survey.
24. Noctule were recorded on a couple of occasions foraging around the trees on the west of the Site. These were seen at 22:11 and 22:15.
25. No roosts were seen or suspected in Building 2.
26. The survey was concluded at 22:40 when patterns of activity around the Site had been discerned and all species could have emerged.

Figure 4 Summary of bat activity observed during emergence survey.



Emergence Survey 3

27. Surveyors were positioned to cover all features with bat roost suitability on Building 1.
28. Overall, bat activity was similar again to previous surveys, with up to three bats foraging across the site.
29. The first registration was at 21:38 when two common pipistrelle were seen commuting north to south over the buildings. Bats were seen commuting in both directions every couple of minutes until 21:38.
30. Common pipistrelle and occasional soprano pipistrelle were seen foraging from 21:37 until the end of the survey around the building and in the large trees surrounding the Site. Up to three bats were recorded at any one time.
31. No roosts were seen or suspected during the survey.
32. The survey was concluded at 22:15 when patterns of activity around the Site had been discerned and all species could have emerged.

Figure 5 Screenshot of roost building using thermal camera



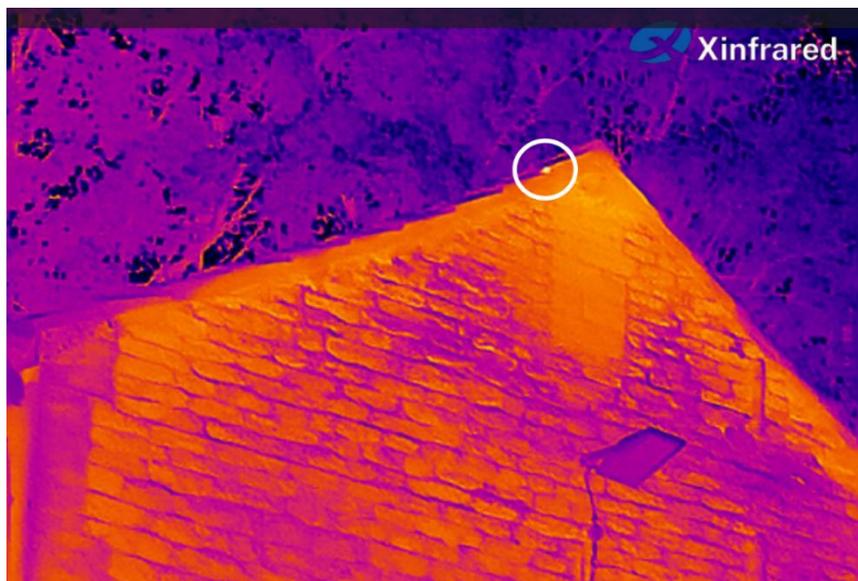
Figure 6 Summary of bat activity observed during emergence survey.



Conclusion

33. Three evening emergence surveys in the peak season have confirmed the presence of a single small day roost, occupied by up to four common pipistrelle bat, which is located along the verge of the eastern elevation of Building 1.
34. The presence of larger roosts elsewhere on Site is not suspected. Current survey information is considered sufficient for planning purposes.
35. 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'.
36. Proposals include removal of the building to facilitate development - this or any other potential disturbing works to the building will require a licence from Natural England to be in place to derogate offenses that will arise through destruction of the roost. This may be a Bat Mitigation Class Licence (BMCL) or European Protected Species Mitigation Licence (EPSML).

Figure 7 Thermal image showing emerging bat and location of the roost



Recommendations

37. 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).
38. 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
39. 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.
40. 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.

Natural England Licence

41. 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?

42. Yes - three evening emergence surveys have been undertaken in the peak survey season. The exact location of the roost has been determined and the presence of a larger roost is not suspected.

Has detailed planning permission been granted for the site and have all conditions relating to wildlife been discharged?

43. Yes - planning permission has been granted and 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?

44. 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?

45. 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.

46. 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?

47. 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.

48. 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

49. Natural England will require specific mitigation for the licensed (BMCL) loss of this roost. Mitigation would 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.

50. In terms of the demolition of 'The Priory', 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 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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