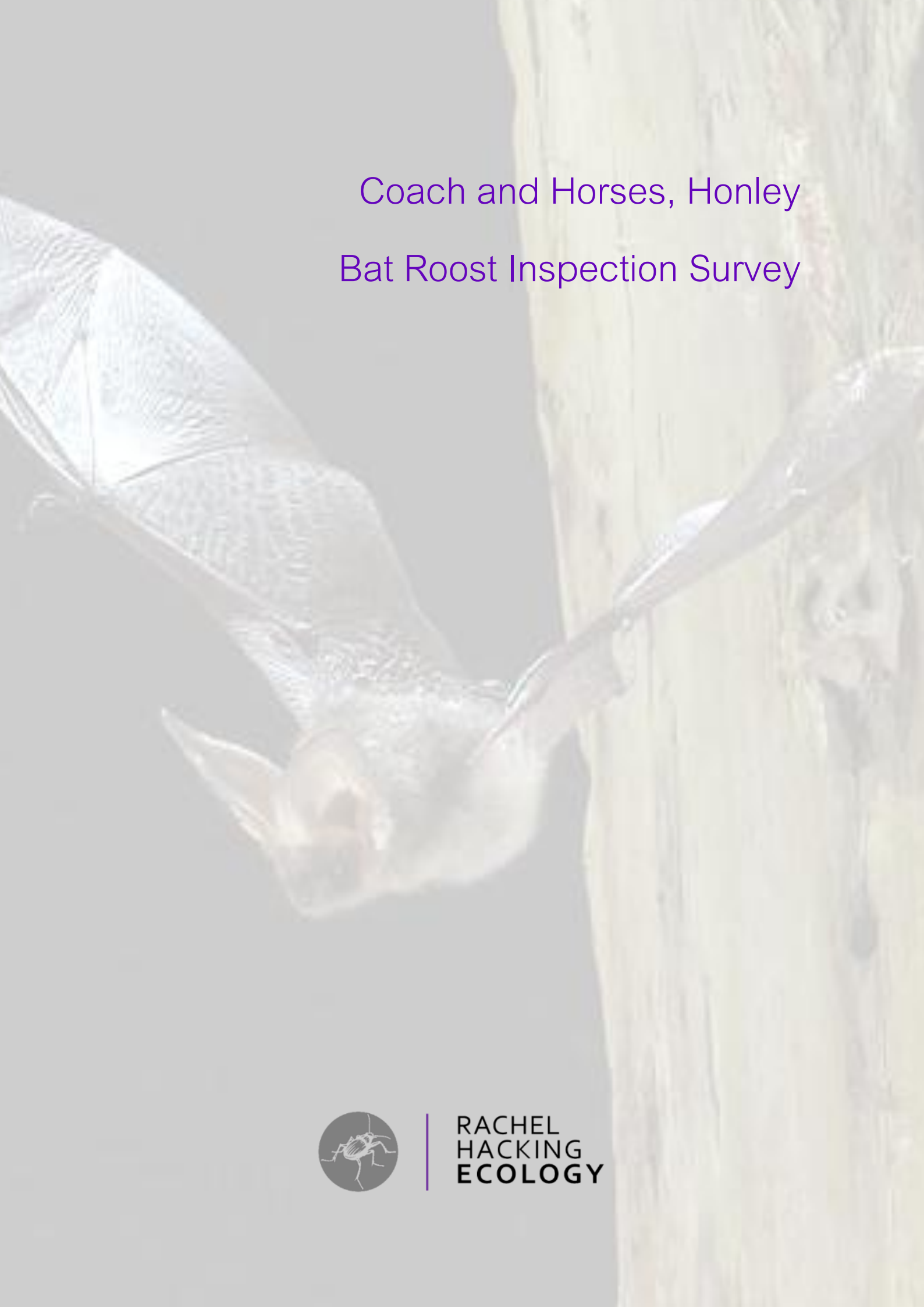

Coach and Horses, Honley

Bat Roost Inspection Survey

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Project Title	Coach and Horses, Honley
Project Reference	RHE.4698
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Report Contents

1. Introduction

1.1 Project Brief

1.1.1 Rachel Hacking Ecology Ltd was commissioned in December 2025 by Cairn Cross to provide ecology consultancy services to support the proposed development of the now disused, former Coach and Horses public house, Eastgate. Honley, hereafter referred to as the 'site'. The site was previously subject to a preliminary bat survey/assessment undertaken as a component of an Extended Phase I Habitat Survey during September 2025 (Eco 360, 2025[1]). This commission was to undertake a bat roost inspection survey to update and consolidate the preliminary work; via a detailed endoscope inspection involving direct observation from a Mobile Elevated Working Platform (MEWP).

1.2 Background

1.2.1 The preliminary survey, undertaken during September 2025 included an assessment of roost presence and an inspection of accessible features from the ground. No evidence of bats was recorded and the assessment concluded that the building (considered as a single structure in the report) is of 'High' potential for roosting bats. Stating that "*Given the abundance of crevice-type features present externally, Building B1 is assessed as having high potential for roosting bats in accordance with current Bat Conservation Trust (BCT) guidelines*."

1.2.2 Subsequently, the Preliminary Ecological Appraisal was submitted to Kirklees Council to inform a pre-application request for the re-development of the site. The proposals are a development for 9 dwellings (apartments) through the conversion, extension and alteration of the former Coach and Horses Public House (Planning reference2025/20627).

1.2.3 The pre-application response stated as follows "*Given the recommendations of the Ecology Team and the requirement to submit an ecological appraisal including a bat survey it is considered the measures to be incorporated to provide a net gain could be detailed as part of those documents.*

1.2.4 Further specific advice received on 25th November 2025 from the Kirklees Council Ecologist stated:

1.2.5 The building, that is to be demolished, is observed to have high potential for roosting bats. As a result, 3no presence / absence surveys will be required to establish whether bats are indeed using the site. These must be completed during the appropriate bat surveys seasons (May – August). As the potential is high, the surveys will need to be completed prior to determination under case law (CO/2820/2008 / 2009 EWHC 1227(Admin)).

[1] Eco 360 (2025) Preliminary Ecological Appraisal

The rest of the site is determined to have negligible potential for all other protected species due to the site consisting of sealed surfaces and a building.

1.3 Aims

1.3.1 As the Kirklees pre-application recommendations are based on the relatively limited information provided following a preliminary ground level assessment, it is considered that a detailed inspection of crevice features from a MEWP would provide more useful information in relation to the presence and likely status of any bat roost(s) present.

1.3.2 The aims of the survey were therefore to inform the proposed development by seeking to establish the presence, location and status of any bat roosts on site and to inform mitigation requirements. Ultimately, the survey further advises the planning application and allows this to proceed in a timely and lawfully robust manner in accordance with national and local planning policy.

2. Methods

2.1 Detailed Endoscope Inspection

2.1.1 A detailed inspection using a torch and endoscope was undertaken in accordance with the Bat Conservation Trust's Bat Surveys for Professional Ecologists: Good Practice Guidelines (2023)[2]. The survey was undertaken by Tim Palmer (Principal Ecologist). Tim has > 20 years of undertaking professional bat surveys and holds a Natural England class 2 survey licence (2015-14656-CLS-CLS).

2.1.2 Evidence indicating the presence of roosting bats was searched for. This included bat droppings on walls, windows or on the ground, below roost entrances or staining from fur oil around roost entry points, as well as the presence of live/dead bats within roosts.

2.1.3 A MEWP was used to enable the surveyor to directly access all higher parts of the external roof/wall features of the buildings. In addition, a thorough endoscope inspection of the entire building interiors, including the cellars was undertaken. The higher internal features were accessed by ladder with detailed inspection done using a torch and endoscope.

2.1.4 There were no access constraints to the survey, and every niche feature was fully inspected, including missing mortar lines, masonry gaps, raised flashing, gaps behind timber facias/barge boards and gaps beneath roof tiles. Internally the floor and wall surfaces were inspected for droppings and feeding remains. The supporting roof timbers, especially the ridge boards and wall plates were checked for bat droppings and presence of bats. Any boarded-up windows were inspected from the inside and all voids within masonry were fully inspected via endoscope.

2.2 Assessment Criteria

2.2.1 Surveys were undertaken in accordance with current guidelines[2] . Interpretation of survey findings and assessment of roosting suitability was undertaken using professional judgement and criteria described in published guidance[2,3]

2.2.2 The detailed inspection has allowed for a refinement of the assessment of building suitability, which is provided individually for all four of the buildings which collectively make up the footprint of the former public house.

2.2.3 The buildings are labelled in Plate 1 below.

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[2] Collins, J. (Ed.) (2023) *Bat Surveys for Professional Ecologists-good practice guidelines. 4th edn.* The Bat Conservation Trust, London.

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

Plate 1: Building numbers (plan courtesy of Acumen Architects and Designers).

2.3 Limitations

2.3.1 There were no limitations to the physical accessibility of niche features. Where potential bat access features lead to larger internal cavities, for example gaps between roof tiles and roof membranes, these were examined by torch if they extended beyond endoscope range; and were also inspected by further access beneath/between roof tiles.

2.3.2 There were no limitations to the survey of potential hibernation locations within the building, the majority of the below ground cellars had no/limited crevice features which could all be fully inspected by torchlight/endoscope. A second survey of the cellars is not considered necessary given the low likelihood of potential use and the absence of evidence gathered from the inspection.

2.3.3 Bat survey results are valid for a limited duration. The composition of habitats and species can change depending on environmental variables and the mobility of species, so the results of a study become less reliable over time. In some cases, surveys that are 3 years old may be acceptable for a project assuming that habitats have not significantly changed in the intervening period, but for protected species it is likely that survey data will need to be no more than 18 months old.

3. Results

3.1 Habitat Appraisal

3.1.1 The site is located in a semi-rural setting with the residential and commercial properties of Honley immediately surrounding the site to the north, south and west. To the east, beyond a narrow track is the River Holme, which is a relatively small, tree lined river corridor. This in turn leads to woodland around the lower Magdale valley which includes excellent bat foraging habitats over large mature tree lined ponds and surrounding woodland.

3.1.2 It is likely that any bats roosting on site would utilise the foraging opportunities along the river and its connecting woodlands as well as extensive gardens within the village. The village itself has a high number of historic properties, many are contemporary with those on site and these are also likely to offer bat roosting opportunities, of which the occupied houses are likely to have preferable thermal characteristics which are typically favoured by bat maternity colonies.

3.1.3 The site is well lit from street lighting from the adjacent Eastgate road, and security lighting from neighbouring properties, although the building itself has no operational security lighting currently in place. A dark corridor exists to the east of the building along the River Holme towards Magdale.

3.1.4 In accordance with standard guidelines for habitat assessment, the site and its surroundings are considered to be within 'High' quality bat foraging/commuting habitat. The design of the new residential scheme will need to ensure that the River Holme corridor in particular, remains subject to minimal levels of lighting.

3.2 External Survey

Building 1 (B1)

3.2.1 The main building which has a frontage on Eastgate. The walls are of coursed masonry with a gable ended pitched roof covered in Yorkshire stone tiles (see Plate 2). There are chimney stack protrusions to both gables. There are <10 lifted roof tiles, and pointing at gable eaves is intact. The building is co-joined with Building 2 (B2) which is set at a slightly lower ridge height but follows the same roof line. Building 3 is also joined to the northern edge of B1 and is also internally linked. B1 has no soffits/facia boards, the roof simply overhangs the eaves with guttering beneath. Coping stones are present along the gable tops and are all well sealed with no gaps. The wall masonry appears to have been relatively recently pointed. The walls, windows and doors are all intact.

3.2.2 The chimney aprons/flashing are well sealed other than some masonry gaps present in the eastern one – where **c.5 old bat droppings observed within the feature (see Plate 3)**.

Plate 2: Showing Yorkshire stone tiles on B1 (all buildings have the same roof covering).

Plate 3: Roost location B1.

Plate 4: Cellar interior - void in masonry.

Building 2 (B2)

3.2.3 This building is smaller than B1 but is of a similar construction and age. The building lies next to B1 and is connected internally. A single chimney stack protrudes centrally, mid-way along the ridge. The roof is similarly clad in Yorkshire stone tiles of which c.40 are raised with gaps beneath. The roof ridge is intact and is well sealed with mortar throughout. There are minor gaps around the chimney aprons. The masonry appears to have been recently re-pointed with a render coating present on the western elevation.

3.2.4 There is a timber facia board present to the rear of the building behind which **c.30 bat droppings were recorded, observed stuck to the upper wall levels, clustered around the roost access point and internally behind the facia board (see Plate 5).**

Plate 5: B2 roost location, behind timer timber facia.

Building 3 (B3)

3.2.5 A further small addition to the rear of the property which forms an extension to B1 and is joined at roof level with a 'valley' between the two buildings. The building is of a similar construction/design and age, however there are no chimneys. The roof is intact and well maintained although there are a number of gaps beneath tiles. The lead flashing at the roof valley junction with B1 has been removed.

3.2.6 **Approximately 20 bat droppings were present between overlapping roof tiles along the western gable eaves (see Plate 6).**

Plate 6: B3 roost location, between overlapping roof tiles.

Building 4 (B4)

3.2.7 The smallest and potentially most recent addition to the buildings is also of a similar construction and design with a Yorkshire stone clad gable ended roof over coursed masonry walls. There was significant loss (theft) of Yorkshire stone tiles from the rear elevation of the building with c.30% of the roof area being exposed and felt membrane visible beneath.

3.2.8 Evidence of **use by bats was recorded here with a cluster of 5 droppings within an eroded mortar fillet in the gable eaves on the western elevation and a small cluster of 8 droppings between overlapping tiles on the eastern elevation of the roof (see Plate 7).**

Plate 7: B4 roost location between overlapping roof tiles.

3.2.9 The locations of identified roosts are shown in Plate 8, below.

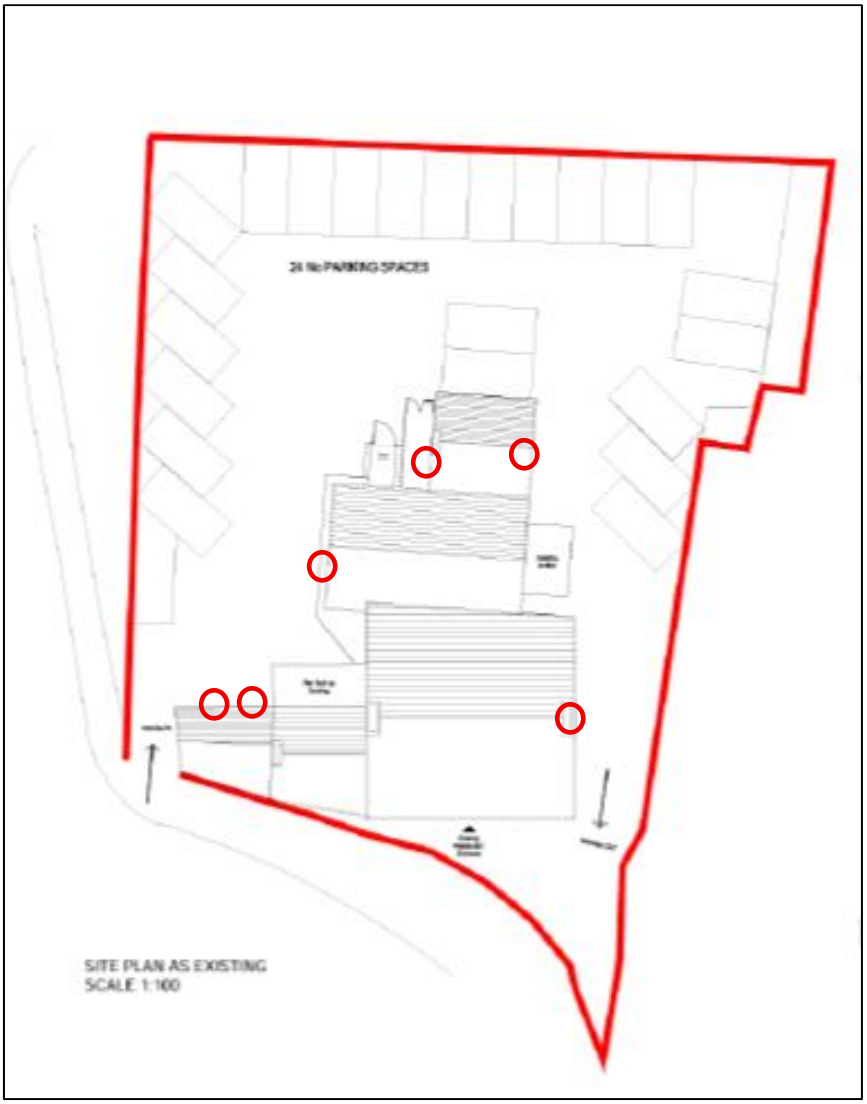

Plate 8: Roost locations (red circles).

3.3 Internal Survey

3.3.1 Inside, the buildings are all connected with an upper and lower floor and a cellar beneath B1. All of the buildings have a bituminous felt liner in place and there are no ceilings/loft voids, hence the roof timbers can be observed directly from the floor beneath. The doors and windows are all intact although there is a 200mm radius hole in the northern wall of B4 close to ground level.

3.3.2 Many of the internal walls are whitewashed including all of the cellar walls. Some exposed masonry is present especially on the ground floor level of B1 and niche features were present caused by eroded mortar joints. Niche features are almost completely absent in the cellar.

3.3.3 Collectively the ground floors of the buildings have generally high internal lighting levels from windows, some of which had been boarded up. The relatively high light levels and absence of a loft void are

likely to restrict the attractiveness of the building interior to roosting bats. No bat droppings or other evidence of roosting bats were recorded inside the buildings during the survey.

4. Assessment

4.1 Interpretation of Results

4.1.1 Under close examination as facilitated by the MEWP, it is considered that the buildings are not suitable for a higher status bat roost such as maternity colony and are unlikely to be used on a regular basis or by larger numbers of bats. Consequently, all of the buildings are considered to be of 'Low' suitability for roosting bats in accordance with the guidelines (Collins 2023).

4.1.2 This change in assessment from the previous initial PEA arises from the increased level of survey detail, with all niche features having been directly checked for the presence of roosting bats as opposed to the previous assessment which gave a precautionary assessment based on ground level observations only (as would be expected from a PEA survey/assessment). Furthermore, following full and detailed inspection of the building interior including the cellars, the building is not considered to be suitable as a 'classic' hibernation roost with no evidence of current or previous bat hibernation being observed by the survey.

4.1.3 The presence of low numbers of bat droppings at six locations within external roof niches of each of the buildings confirms the likely usage of the building by low numbers of bats, or more likely individual bats roosting opportunistically, exploiting several available roost niches; rather than their being any single aggregation of bats with a particular feature.

4.2 Assessment of Impacts

4.2.1 The proposals will involve re-roofing and internal refurbishment of B1 and B2. B3 and B4 are to be demolished and replaced with a new dwelling. Collectively, the development proposals will unavoidably result in the loss of the identified low status roosts which are likely to be occupied by common pipstrelle *Pipistrellus pipistrellus* or soprano pipistrelle bats *Pipistrellus pygmaeus*.

4.2.2 The site lighting scheme may, in the absence of design mitigation result in disturbance impacts to bat foraging routes along the River Holme corridor which runs adjacent and to the east of the site.

4.3 Mitigation and Licensing

4.3.1 Mitigation will be provided and secured via a planning condition, to ensure that the conservation status of bats is maintained. It is recommended that a Mitigation Statement is provided with details of how the mitigation will be designed and delivered. The Mitigation Statement will include further surveys to confirm the established status of the roosts identified by the roost surveys and to fully inform the Mitigation Licensing process. The Mitigation Statement should be fully approved by the Council in

advance of works with all of its elements considered to be pre-commencement. The Mitigation Statement will include the following:

- Provision of a Licensed Ecologist to closely supervise works to the roof structure in the vicinity of known roosts to minimise the likelihood of harm to bats within the roosts.
- Hand demolition/removal of the roof structures (tiles, battens and membrane).
- Provision of six integral bat boxes and or roosting opportunities within the upper wall fabric of the retained buildings, to ensure equivalent roost capacity is maintained following the construction.
- Provision of a lighting scheme which ensures the new roost locations (integral bat boxes) and dark corridor along the River Holme is maintained.
- Completion of two confirmatory Emergence surveys using five surveyors and in line with the survey guidelines (Collins 2023). Surveys will be programmed for the period May- August (inclusive) and will be spaced at least 3 weeks apart.

4.3.2 It is suggested that the wording of the planning condition required to secure the Mitigation Statement is similar to the example provided below:

Prior to development commencing, a Mitigation Statement shall be submitted to, and approved in writing by, the Local Planning Authority. This shall confirm mitigation requirements to inform the necessary European Protected Species (EPS) licence required to facilitate the development. Thereafter the development shall be undertaken in accordance with the findings and recommendations of the approved documents. Reason: In the interest of ensuring up to date surveys and ecological understanding is available for the site, in the interest of protecting local ecology, and to comply with the aims and objectives of Policy LP30 of the Kirklees Local Plan. This is a pre-commencement condition to ensure appropriate survey and mitigation works are undertaken before potential impacts take place.

5. Conclusion

5.1.1 The aims of the survey were achieved. The detailed inspection has identified evidence indicating use by roosting bats, likely to represent a low status roost and has updated the preliminary assessment of roost potential.

5.1.2 A number of mitigation measures have been proposed, and these are to be detailed within a Mitigation Statement which will itself be secured by planning condition.

5.1.3 A Mitigation Licence will be needed in advance of any works that could affect bats or their roosts, these are roofing works and demolition. The site is likely to meet the criteria for a Bat Mitigation Class Licence which would be the most appropriate way of obtaining the legal derogation necessary to lawfully continue the development.

Appendix 1: Planning Policy & Legislation

National Policy

The National Planning Policy Framework (NPPF 2024) describes the Government's planning policy for England and how it should be applied. Within this framework, the requirements in relation to biodiversity are included within several policies. The two most relevant to individual planning decisions are Paragraphs 174 and 180, shown below:

- 174. Planning policies and decisions should contribute to and enhance the natural and local environment by:
    a. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
    b. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
    c. maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
    d. minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; etc…

- 180. When determining planning applications, local planning authorities should apply the following principles:
    a. if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
    b. development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c. development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
d. development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 places a duty on every public authority to have regard to conserving biodiversity. Section 41 of the same Act requires that the Secretary of State must publish a list of the living organisms and types of habitats that are of 'Principal Importance' for the purpose of conserving biodiversity. The Secretary of State must take steps, as appear reasonably practicable, to further the conservation of those living organisms and habitats in any list published under this section. The list of species and habitats of principal importance currently includes 943 species and 56 habitats.

Legislation

All bat species are protected under the Conservation of Habitats and Species Regulations 2019 (Amendment) (EU Exit), which make is an offence to:

- Deliberately kill, injure or capture a bat;
- Deliberately disturb bats;
- Damage or destroy a breeding site or resting place of a bat.

The Wildlife & Countryside Act 1981 (as amended) contains further provisions making it an offence to intentionally or recklessly:

- Obstruct access to any structure or place which any bat uses for shelter or protection; or
- Disturb any bat while occupying a structure or place which it uses for that purpose.

Proposed development works that are likely to disturb or destroy bats or their roosts will need to obtain a licence from the relevant Statutory Nature Conservation Organisation (e.g., Natural England) prior to work commencing.