



Bat Survey Report

New Mills, Marsden

Presented to: Crowther Bruce and Co Limited

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Executive Summary

<p>Scope of Works</p>	<p>Lucion Delta-Simons Ltd. was instructed by Rex Procter & Partners on behalf of Crowther Bruce and Co Limited ('the Client') to undertake bat roost presence/absence surveys of land of New Mills, Marsden in Huddersfield, West Yorkshire ('the Site'). The surveys were undertaken to inform the Client of any constraints, and associated requirements for avoidance, mitigation and compensation measures, with regards to bats and to inform a planning application for the demolition and redevelopment at the Site. The scope is based on the findings of the Preliminary Ecological Appraisal (PEA) undertaken by Envirotech NW Ltd. in relation to the level of suitability of the buildings for bat roosting potential and the recommendations for the Site.</p>
<p>Current Site Status</p>	<p>The Site consists of several multi-storey mill buildings with mixed roof types of various sizes and designs. A small outdoor area between the buildings with ephemeral vegetation is present. The Site is located on Brougham Road at New Mills, Marsden in Huddersfield, West Yorkshire. The River Colne is located adjacent to the northern boundary of the Site.</p>
<p>Proposed Development</p>	<p>It is understood that the Site is being considered for commercial and residential development with green infrastructure and a carpark, however, detailed development plans were unavailable at the time of writing this Report.</p>
<p>Results:</p>	<p><u>Roost Presence/Absence Surveys</u></p> <p>The bat activity recorded during the dusk emergence surveys and dawn return survey were fairly high, with foraging and commuting activity predominantly associated with the interior corridor, over buildings on Site and adjacent to the Site boundary (especially over and adjacent to the River Colne). At least seven roosts (one maternity and six day roosts) were spread across the Site were recorded across six buildings:</p> <ul style="list-style-type: none"> • BC / BD.1 – one maternity roost with a peak count of 17 bats recorded; • BD.1 – one day roost of individual bats recorded; • BE.1 – two separate day roosts of individual bats recorded; • BF.1 – one day roost of individual bats recorded; • BG – one day roost of individual bats recorded; • BL – one day roost of individual bats recorded. <p>The following buildings had no roosts recorded: BA, BB, BD.2, BE.2, BF.2, BF.3, BH, BI, BJ.1, BJ.2, BK, BM, BN, BM, BO, BP, BQ, BR, BS and BT.</p> <p><u>Nesting Birds</u></p> <p>Active bird nests were recorded throughout the Site during the Roost Presence/Absence Surveys. An active Barn Owl nest was recorded on top of building BD.2 and active swift nests were recorded within buildings BB, BF.1, BD.1, BF.2 and BF.3.</p>
<p>Recommendations</p>	<p>The detailed recommendations set out within the Report are summarised below:</p> <p><u>Roosting Bats</u></p> <p>Recommendation 1 - European Protected Species Licence (EPSL)</p> <p>An EPSL must be obtained from Natural England prior to any works commencing to Buildings on-Site. This will require adequate mitigation and compensation to be incorporated into the</p>

proposed development plan in order to negate any adverse impacts upon bats. It is likely that EPS Policy 4 will need to be applied.

A method statement will be prepared to detail the proposed working methodologies, timetable of works and mitigation measures to minimise the direct impact upon bats (these will be discussed with the Client and contractors prior to submission of the application). This should include supervision by a licenced bat ecologist, pre-commencement surveys, and sensitive working practices, as appropriate.

The proposed demolition and refurbishment of the buildings should be undertaken during the active bat season (April - October, inclusive). However, the works to BD.12 should be undertaken outside of the maternity period (March – April or September to October, inclusive).

Recommendation 2 – Winter Hibernation Surveys

Winter Hibernation Surveys are recommended in order to identify the presence of hibernating bats and/or evidence of bat occupation within the internal space of buildings on-Site as they have the potential to support winter roosting habitat. The surveys would involve two survey visits four weeks apart during the coldest months of the year (typically January and February). Following each inspection, static detectors should be set to record within the buildings where deemed appropriate and left for 14 nights.

Recommendation 3 - Lighting

To prevent any adverse impact upon the potential roosting, commuting and foraging habitats for bats adjacent to the Site, any new or amended lighting for the Site must be functional and directional only and kept to a minimum servicing the working areas of the proposed development (as required for safety and security). It should be achieved using baffles and screens, if necessary, to ensure no light spills onto retained habitats. Full details of lighting specifications can be found in Section 6.3 of this Report.

Recommendation 4 - Post Development Enhancements

Compensatory and Mitigation bat boxes will need to be installed as part of any licenced works, however, to comply with the NPPF, further enhancements must be provided, as such Lucion Delta-Simons Ltd. recommends boxes incorporated into the new building design, if appropriate. Details can be found in Section 6.4 of this Report.

Nesting Birds

An EPSL must be obtained from Natural England prior to any works commencing to Buildings on-Site. Barn owl surveys and sensitive timing of works and avoidance of the nesting season (early March through August, inclusive). Inclusion of bird nesting boxes during both the construction and operational phase of the Proposed Development.

This Bat Survey Executive Summary is intended as a summary of the assessment of the Site based on information received by Lucion Delta-Simons Ltd at the time of production. This Executive Summary should be read in conjunction with the full report.

1.0 Introduction

1.1 Purpose and Scope of the Survey

Lucion Delta-Simons Ltd was instructed by Rex Procter & Partners on behalf of Crowther Bruce and Co Limited ('the Client') to undertake a Bat Presence/Absence Surveys of land off Brougham Road at New Mills, Marsden in Huddersfield, West Yorkshire ('the Site'). The Site location is shown in Figure 1. This follows the recommendations of the Preliminary Ecological Appraisal (PEA) undertaken by Envirotech NW Ltd on 30th November 2023 and an updated PEA by Futures Ecology undertaken on 30th April 2025. The PEA was undertaken to inform the Client of any constraints and associated requirements for avoidance, mitigation, and compensation measures with regards to protected species including bats and to inform a planning application for the demolition and refurbishment of the buildings and the redevelopment of retail and residential units at the Site.

The aim of the bat surveys was to:

- Determine whether or not bats are using the buildings on Site as a roost and the extent of bat activity associated with the buildings; Assess bat activity at the Site; and
- Determine the impact of the proposed development on any bats using the Site.

1.2 Site Description

The Site is centred at Ordnance Survey (OS) grid reference SE 05013 11682, located in the centre of Marsden in Huddersfield, West Yorkshire. The Site covers an area of approximately 1.51 ha and comprises several multi-storey mill buildings of various sizes and designs and a small outdoor area between the buildings with ephemeral vegetation. The River Colne is located directly north of the Site.

The Site is surrounded by some urban and residential development beyond which small patches of woodland, arable fields and expansive areas of moorland are present.

1.3 Proposed Development

It is understood from the drawing provided by the Client ('2029 PROPOSED MASTERPLAN 15 09 25' received on 16 September 2025) that the Proposed Development comprises approximately 1.51 hectares (ha) and will be comprised of a mix of retail and residential buildings, a carpark and hardstanding (Drawing 1). Furthermore, site buildings will either be demolished (BD.2, BE.2, BG, BH, BI, BJ.1, BK, BL, BM, BN, BO, BS and BT) or refurbished (BA, BB, BC, BD.1, BE.1, BF.1, BF.2, BF.3, BJ.2, BP, BQ, BR and BS).

2.0 Legislation and Policy

2.1 Bats

All bats are protected under Section 9(4)(b) and (c) of the Wildlife and Countryside Act (WCA) 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017.

It is an offence to destroy or damage a breeding site or resting place of a bat, to intentionally or recklessly obstruct access to any place of shelter or protection for bats, to deliberately disturb bat species, to intentionally or recklessly disturb a bat whilst in its place of shelter or protection, or deliberately capture, injure or kill a bat. It should be noted that a breeding site or resting place of a bat is protected whether or not bats are present, as long as it is likely that they will return, and any activity or works damaging or destroying such a breeding site or resting place are likely to require a Natural England European Protected Species Licence (EPSL).

2.2 Birds

All wild birds are protected under Section 1 of the WCA 1981 (as amended). Subsection 1(1) makes it an offence to intentionally kill, injure, or take any wild bird; take, damage or destroy the nest of any such bird whilst it is in use or being built; or take or destroy an egg of any such wild bird. It is, furthermore, an offence to either intentionally, or recklessly, disturb any wild bird listed on Schedule 1 while it is nest building, or at a nest containing eggs or young, or disturb the dependent young of such a bird. The law covers all species of wild birds including common, pest or opportunistic species.

2.3 Other Protected Species

All badgers are protected under The Protection of Badgers Act 1992 as well as the WCA 1981 (as amended). It is an offence to kill, injure, take, possess, cruelly treat, or disturb their setts.

2.4 Planning

As referenced in the National Planning Policy Framework (NPPF, 2021), the Office of the Deputy Prime Minister Circular (2005) advises that ecological surveys are undertaken before planning permission is determined. The circular states "The need to ensure that ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances" (see References, Appendix A).

The NPPF also states "*Planning policies and decisions should contribute to and enhance the local environment by (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...*"

3.0 Methodology

The bat surveys were undertaken following the guidelines in the Bat Conservation Trust’s (BCT) Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition (Collins (ed) 2023), English Nature (2004) Bat Mitigation Guidelines, and BS 42020: 2013 Biodiversity Code of Practice for Planning and Development.

3.1 Roost Presence/Absence Survey

Dusk emergence nocturnal surveys and a single dawn return survey were carried out to determine bat activity associated with the buildings at the Site assessed as having BRP by Envirotech NW Ltd. The level of survey required was dependent on the level of suitability, which was based on the recommendations by the Future’s Ecology PEA report. Three separate bats surveys were undertaken on building BE.1, two surveys on building BA and one survey on all other buildings on-Site. The nocturnal surveys were undertaken by a suitable number of ecologists to ensure that the buildings are adequately covered.

The dusk surveys commenced approximately fifteen minutes prior to sunset and ceased approximately one and a half hours following sunset. The dawn surveys commenced approximately one and a half hours prior to sunrise and finished at sunrise, or fifteen minutes after depending on light, weather conditions and bat activity. The surveyors were equipped with Echometer Meter Touch Pro 2s, iPhone (s) and infra-red camera recording equipment. Recordings were made of any bats seen and/or heard and the species, the timing, activity, location, and direction of flight.

3.2 Buildings

For each suitable building bat surveys were undertaken which included five dusk emergence surveys and a single dawn return survey over the course of the 2025 survey season. The following buildings were assessed as having low BRP: BB, BC, BE.2, BD.1, BD.2, BF.1, BF.2, BF.3, BG, BH, BI, BJ.1, BJ.2, BK, BL, BM, BN, BO, BP, BQ, BR, BS, and BT. The only building assessed as having moderate BRP suitability was BA. The only building assessed as having high BRP suitability was BE.1.

Buildings with low BRP had one survey visit completed, the building with moderate BRP had two surveys completed and the building with high BRP had three surveys completed. Table 1 provides details of the surveys and locations of the surveyors. The roofs of buildings BO, BP, BQ, BR and BS were surveyed from BF.1 and the roof of building BE.1 was surveyed from inside of BD.1.

Table 1– Timings, Weather Conditions and Location of Surveyors of the Building Surveys

Structure	Date	Timing	Weather	Surveyor Location
Buildings BA, BB, BC, , BE.1, BE.2, BF.1, BF.2, BF.3, , BJ.2, BK, BL, BO, BP, BQ, BR, BT	24/06/2025	21:25 - 23:10 (sunset 21:40)	21 °C, 8/8 cloud cover, F1 wind, light persistent rain	1 – Within carpark north of River Colne facing northern aspect of BE.1, BD.1, and BG 2 – Within carpark north of River Colne facing northern aspect of BK, BM, and BL 3 – North of River Colne (BM) northern aspect of BK, BM, and BL 4 – Along the southern Site boundary facing southern aspect of BA, BB and BT 5 – Along the southern Site boundary facing the southern aspect of BB and BD.1 6 – Along the southern Site boundary facing northern aspect

				<p>of BE.2 and the western aspect of BD.1</p> <p>7 – Along the southern Site boundary facing southern aspect BE.2</p> <p>8 – East of BJ.1 southern aspect and east of BA</p> <p>9 – East of BJ.2 northern aspect</p> <p>10 – East of BJ.2 central aspect</p> <p>11 – Southwest of BE.2, facing BE.2 southern and western aspect</p> <p>12 - North-west of BE.1, facing</p>
Buildings BD.1, BD.2, BF.2, BG, BH, BI, BM, BN	25/06/2025	21:26 - 23:11 (sunset 21:41)	20°C, 6/8 cloud cover, F1 wind, dry	<p>1 – Inside interior corridor between BE.1 and BG facing the northern aspect of BD.1 and western aspect of BG</p> <p>2 – Inside interior corridor between BG and BD.2 facing the northern aspect of BD.2 and western aspect of BH and BN</p> <p>3 – Inside interior corridor between BH and BF.1 facing the western aspect of BO and southern aspect of BI, BN and northern aspect of BF.1</p> <p>4 – Inside interior corridor between BK and BF.1 facing the western aspect of BO</p> <p>5 – Inside BR between BP and BL facing BJ.2</p> <p>6 – Inside BR between BL and BQ facing BM and BP</p> <p>7 – I Along the southern boundary of the Site facing BB and BT</p> <p>8 – Along the southern Site boundary between BD.1 and BB facing north</p> <p>9 – Inside the interior corridor between BD.1, BF.2 and BF.3 facing north</p> <p>10 – Inside interior corridor between BD.1 and BF.1 facing north-west toward BD.1 and BC</p>

<p>Buildings BD.1, BD.2, BE.1, BF.1, BF.2, BF.3, BG, BH, BI, BJ.2, BK, BL, BM, BO, BP, BR, BS</p>	<p>16/07/2025</p>	<p>21:12 – 22:57 (sunset 21:27)</p>	<p>17°C, 1/8 cloud cover, F1 wind, dry</p>	<p>1 – Inside interior corridor between BG and BD.2 facing the northern aspect of BD.2 and western aspect of BG, BH and BN 2 – Inside BR between BP and BJ.2 facing north toward BM and BL 3 – Inside interior corridor between BF.1 and BD.1 along northern aspect of BF.3 facing north into interior corridor 4 – Inside BF.1 along the western boundary of the building facing west towards BD.1 and BC 5 – Inside interior corridor between BF.1 and BD.1 facing north-west of interior corridor 6 – Along western boundary of Site facing western aspect of BE.1 7 – Inside BD.1 southern aspect facing eastern aspect of BE.1 8 – Inside BD.1 northern aspect facing eastern aspect of BE.1</p>
<p>BA, BC, BD.1, BD.2, BE.1, BE.2, BF.1, BF.2, BF.3, BG, BI, BH, BJ.1, BK, BL, BM, BN, BO, BP, BQ, BS</p>	<p>05/08/2025</p>	<p>3:29 – 5:29 (sunrise 5:29)</p>	<p>12°C, 8/8 cloud cover, F2 wind, light rain</p>	<p>1 – Inside interior corridor between BG and BD.1 and BD.2 facing the northern aspect of BD.1 and western aspect of BG, BH and BN</p>

				<p>2 – Inside interior corridor between BI and BF.1 facing the western aspect of BO and southern aspect of BI and BK and northern aspect of BF.1</p> <p>3 – Inside BK along the southern aspect of BK and the northern aspect of BO and between BI and BM facing BK</p> <p>4 – Inside BO along the western aspect of BO facing BO and BP between BK and BF.1</p> <p>5 – Inside BO along the southern aspect facing interior courtyard and between BK, BF.1 and BP</p> <p>6 – Inside interior corridor between BF.1 and BD.1 along northern aspect of BF.3 facing north into interior corridor</p> <p>7 – Inside interior corridor between BF.1 and BD.1 facing north-west of interior corridor</p> <p>8 – Inside interior corridor between BD.1 and BF.1 facing north</p>
	05/08/2025	20:39 – 22:24 (sunset 20:54)	14°C, 2/8 cloud cover, F2 wind, dry	<p>1 – Within carpark north of River Colne facing northern aspect of BE.1, BD.1 and BG</p> <p>2 – Within carpark north of River Colne facing northern aspect of BK, BM and BL</p> <p>3 – Inside BF.1 looking over roofs of BO, BP, BQ, BR and BS</p> <p>4 – Inside BF.1 along the eastern boundary of the building facing BS and BQ</p> <p>5 – Adjacent to the south-west corner of the Site boundary facing southern aspect of BA and BJ.1</p> <p>6 – Inside interior corridor between BD.1 and BF.1 facing north</p> <p>7 – Inside BD.1 southern aspect facing BE.2</p>

				8 – Adjacent to western Site boundary facing the western aspect of BE.1 9 – Inside BD.1 northern aspect along facing BE.1 –
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With reference to the Bat Mitigation Guidelines (2004), Collins (2023) and professional judgement, the weather conditions during the dusk/dawn surveys were considered suitable.

3.3 Limitations to the Survey

There were no limitations to the survey in terms of timings, access or weather conditions.

The visibility of roofs on many of the buildings was limited from the ground, due to this it was difficult for surveyors to know the exact locations of some roosts recorded.

The baseline conditions described in this report were accurate at the time at which the survey was undertaken. Should at least 18 months pass by, and/or conditions on-Site or Site usage change prior to the commencement of works, it is recommended that an update survey is undertaken.

3.4 Details of Surveyors

The dusk emergence surveys were undertaken by surveyors in Table 2 below.

Table 2 - Details of Surveyors

Name and Experience of Surveyor	Presence/Absence Surveys
Jonathan Spencer, Associate Ecologist 16 years of bat survey experience Natural England Licence No. No. 2015-14407-CLS-CLS	✓
Becky Hodgins, Consultant Ecologist 5 years of bat survey experience Natural England Licence No. 2023-11003-CL18-BATVicky	✓
Vicky Newlove, BNG Natural Capital Lead 13 years bat survey experience	✓
Danni Phillips, Senior Ecologist Five years bat survey experience	✓
Joe Valentine, Senior Ecologist Five years bat survey experience	✓
Jordan Lane, Senior Ecologist Four years of bat survey experience	✓

Lousie Haycock, Consultant Ecologist Seven years of bat survey experience	✓
Dominic Harley, Consultant Ecologist Four years bat survey experience	✓
Caley Nevin, Consultant Ecologist Three years bat survey experience	✓
Jackie Grissom, Consultant Ecologist Three years bat survey experience	✓
James Carter, Consultant Ecologist Three years of bat survey experience	✓
Tom Jukes, Graduate Ecologist Three years bat survey experience	✓
Adam Hicks, Seasonal Ecologist Three years bat survey experience	✓
Nina Freer Bat surveyor	✓

4.0 Results

4.1 Previous Survey Results

4.1.1 Envirotech NW Ltd PEA Results

The PEA issued by Envirotech NW Ltd in February 2023 stated there was a high degree of variation in building conditions in regard to roosting bat potential. Cracks, crevices and holes were recorded as potential features throughout the Site. Roof verges where coping stones were dislodged were assessed as the most notable features. Water was recorded to be flowing down some external walls of the buildings making parts of the Site less suitable for roosting bats. All of the trees around the perimeter of the Site were assessed as negligible for roosting bats.

The PEA concluded the Site provided poor foraging habitat for bats due to the amount of the Site being comprised of hardstanding and buildings with little vegetation cover as such the Site was assessed as negligible for foraging bats. The River Colne adjacent to the Site was assessed as having limited potential for foraging bats due to the bankside providing little vegetation cover. The River Colne was assessed as having low foraging value for bats near the Site.

The PEA assessed the Site overall as being at least of moderate suitability for hibernation. A large culvert under the Site carrying the River Colne was assessed to be marginally suitable for hibernating bats. As an internal inspection was not undertaken it was considered that basements / cellars within the Site buildings that were linked to the culvert may have been suitable for hibernating bats.

4.1.2 Futures Ecology PEA Results

The PEA issued by Futures Ecology in July 2025 identified The River Colne as a likely significant resource for foraging bats however, the Site was comprised of unsuitable habitat offering limited foraging potential for bats.

Building BE.1 was assessed as having high suitability for roosting bats, building BA had moderate suitability, and buildings BB, BC, BE.2, BD.1, BD.2, BF.1, BF.2, BF.3, BG, BH, BI, BJ.1, BJ.2, BK, BL, BM, BN, BO, BP, BQ, BR, BS, and BT all had low suitability. No trees on-Site were identified as having any bat roosting potential.

A number of buildings were assessed as having hibernation potential for bats: within the basement / cellar of BF.1 and BD.1, and within the stonework of these buildings in addition to buildings BB, BE.1, BE.2, BF.2, BG, BH, BI, BJ.2 and BP. The gaps in stonework of the buildings were cited as suitable for individual or small number hibernating bats. Beneath buildings BG, BK, BM and BL within the culvert and area of the river that flows under building BE.1 were inaccessible to surveyors but were assessed as having suitable hibernation potential for bats.

4.2 Roost Presence/Absence Survey

The results of the roost presence/absence and characterisation surveys of the buildings assessed as having BRP are summarised below, illustrated in Figures 2-7.. Each emergence survey covered aspects of several of the buildings within the Site due to the interconnectivity of the building complex.

Dusk Emergence Survey 24th June 2025

The first bat, species unknown, was seen not heard near the south-west boundary of the Site at 21:28 (12 minutes before sunset). Following this, a single common pipistrelle emerged from the eastern side of BD.1 at 21:47 (7 minutes after sunset). Seven more common pipistrelles emerged from BD.1 between 21:52 and 22:00 (12 to 20 minutes after sunset). Throughout the survey several common pipistrelles were recorded foraging within the interior corridor between the buildings on Site and along the northern and southern boundary of the Site. A single soprano pipistrelle *Pipistrellus pygmaeus* and several common pipistrelles were recorded commuting over BB. Several common pipistrelle bats were heard but not seen foraging throughout the survey. Four bats, species unknown, were seen but not heard foraging within the corridor of the Site in between the buildings between 21:48 and 22:06. The last bat, a common pipistrelle, was recorded commuting south to north across building BB at 22:23.

Dusk Emergence Survey 25th June 2025

The first bat, a common pipistrelle, was heard not seen from survey along the northern boundary of the Site at 21:41 (at sunset). Following this, up to ten common pipistrelle bats emerged from BC / BD.1 between 21:45 and 22:12 (4 minutes to 31 minutes after sunset), the surveyor was unable to identify the exact location of the roost. Another seven common pipistrelle bats emerged from BC at 21:47 (6 minutes after sunset), the surveyor was unable to identify the exact location of the roost. An unknown bat, species (likely a pipistrelle), emerged in the interior of Building BL at 21:54 (13 minutes after sunset) and flew over a surveyor inside of BR. Also, at 21:54, two common pipistrelles emerged from underneath the culvert of Building BG. Throughout the survey common pipistrelle were recorded continuously foraging and occasionally commuting throughout the interior corridor. Two *Myotis* sp. were recorded, once foraging and once commuting. Common pipistrelles were occasionally heard not seen foraging throughout the survey. A single soprano pipistrelle was heard not seen inside of BR at 22:46. The last bat, a *Myotis* sp., was heard not seen along the southern boundary of the Site at 23:06.

Dusk Emergence Survey 16th July 2025

The first bat, a common pipistrelle, was heard not seen along the northern boundary of the Site at 21:26 (1 minute before sunset). Following this, two common pipistrelle bats emerged from BG at 21:42 (15 minutes after sunset). Following this, a common pipistrelle emerged from the gable end of BE.1 at 21:58 (31 minutes after sunset), a second common pipistrelle emerged from a different location on the gable end of BE.1 at 22:01 (34 minutes after sunset). At X (X minutes after sunset) X common pipistrelle emerged from BF.1. Throughout the survey, common pipistrelle bats were recorded foraging within the interior corridor, along the northern boundary of the Site and over BE.1 and BE.2. Several common pipistrelle bats were heard not seen foraging along the northern boundary of the Site and surrounding BE.1 and BE.2. One soprano pipistrelle was heard not seen commuting near BE.1. Two common pipistrelles were seen not heard inside BR and BL. The last bat, a common pipistrelle, was recorded at 22:57.

Dawn Return Survey 5th August 2025

The first bat, a common pipistrelle, was heard not seen at 3:37 (one hour and 46 minutes before sunrise). Following this, a common pipistrelle returned to BG at 05:03 (26 minutes before sunrise). A common pipistrelle returned to roost in BC at 5:12 (17 minutes before sunrise). Throughout the survey, common pipistrelle bats were recorded foraging or commuting along the northern boundary of the Site over the River Colne, inside BO, over BF.1 or within the interior corridor. Several common pipistrelle bats were heard not seen in within the courtyard, on the River Colne and within BO. Inside BO, a single common pipistrelle was seen not heard and a soprano pipistrelle was heard not seen. Two noctules *Nyctalus noctula* and one Leisler's bat *Nyctalus leisleri* were heard not seen. The last bat, was a common pipistrelle, was recorded within the interior corridor near building BD.1 at 05:27.

Dusk Emergence Survey 5th August 2025

The first bat, a common pipistrelle, was recorded at 20:56 (at sunset) which emerged from BF.1. Following this, at 21:09 another common pipistrelle emerged from BF.1. Following this, a single common pipistrelle emerged from the gable end of BE.1 at 21:33 (37 minutes after sunset). Throughout the survey common pipistrelle bats were recorded foraging and commuting within the interior corridor, over many of the buildings (BE.1 BE.2, BG, BH, BI, BN, and BK) as well as over and north of the River Colne. A single noctule was heard not seen. The last bat, a common pipistrelle, was recorded at 22:26 near the northern boundary of the Site.

4.3 Roost Characterisation

Seven confirmed and potential roosts were recorded during the surveys, details of which are provided in Table 3 below, and are shown in Figure 8.

Table 3 – Summary of Roost Located at the Site

Roost Reference	Location	Species	Peak count	Roost Classification	Photograph Reference
1	Building BC / BD.1	Common pipistrelle	17	Possible maternity roost	Photograph 1
2	Building BL	Pipistrelle	1	Day roost	Photograph 2
3	Building BG	Common pipistrelle	2	Day roost	
4	Building BE.1*	Common pipistrelle	1	Day roost	Photograph 3
5		Common pipistrelle	1	Day roost	Photograph 3
6	Building BF.1	Common pipistrelle	2	Day roost	
7	Building BD.1	Common pipistrelle	1	Day roost	Photograph 1

*Two separate roost locations were recorded on building BE.1

4.4 Nesting Birds

Several active swift *Apus apus* nests were identified by surveyors during the 2025 Roost Presence/Absence Surveys which were present in buildings BB, BD.1, BF.1, BF.2 and BF.3. Active swift were recorded within brickwork gaps (including windowsill edges) of the buildings. Swifts are on the Birds of Conservation Concern (BoCC) Red List and are considered to be of high conservation concern.

An active barn owl *Tyto alba* nest was present on the rooftop of BD.2 while BD.1 and BF.1 were used as roosting sites. Barn owl are protected under Schedule 1 of WCA 1981 (as amended).

Several feral pigeons *Columba livia* were observed making use of the Site inside many of the buildings.

Figure 9 shows active bird nests recorded by surveyors.

4.5 Other Protected Species

A badger was recorded commuting adjacent to the eastern boundary of the Site during the 5th of August dusk survey.

Figure 7 shows the location of the badger sighting.

5.0 Conclusion

5.1 Roosting Bats

At least seven separate roost locations were identified during the 2025 bat surveys. At times, it was difficult to for surveyors to identify exactly where the roosts were located due to the complexity of the Site / buildings. A possible maternity roost (Roost 1) used by pregnant females (not lactating) and consisted of 17 individuals. Roost 1 was recorded on two separate surveys in the first round of surveys; however, it was not recorded during the second and third survey, it is anticipated that the maternity roost dispersed to another maternity site. Six of the roosts (Roosts 2 – 7) identified were likely day roosts used by non-breeding females or lone males, five of the roosts were identified in buildings that were categorized as low suitability and two from buildings categorized as high suitability during the initial Preliminary Ecological Assessment (PEA) by Futures Ecology.

The exterior of the Site was lit by security and streetlighting (Photographs 4 – 6) which could limit the suitability of the Site to more light-tolerant species of bats. Therefore, only pipistrelle (light tolerant species) was recorded, the additional lighting could be a factor in why the majority of activity was recorded within the unlit courtyard of the Site.

Based on the findings of the PEA by Futures Ecology, buildings BB, , BD.2, BE.2, BF.2, BF.3, BH, BI, BJ.1, BJ.2, BK, BM, BN, BO, BP, BQ, BR, BS and BT had low potential for bats, and the dusk and dawn surveys did not indicate any signs of roosting, such that a bat roost was considered likely to be absent. However, bats are mobile animals and often change roost sites on a regular basis and during different times of year. The features on Building BA, and BE.2 which were categorized as having moderate to high roosting potential during the PEA by Futures Ecology, may become colonised over time. As such further surveys may be required should works to the buildings be delayed more than 18 months from the date of the surveys and/or as a precaution prior to any works/demolition of the building.

Further surveys will be required should the works be delayed for more than 18 months from the date of the 2025 surveys. However, as an EPSL is required, the survey data that is required to inform the application needs to be from the current or most recent season i.e., no more than 12 months old.

5.2 Nesting Birds

The level of suitability of the Site for nesting birds was not categorised within the PEA report by Envirotech NW Ltd., only that the Site was considered to be suitable for nesting birds. The Futures Ecology PEA assessed buildings on site as suitable for nesting birds such as jackdaw *Coloeus monedula* and peregrine *Falco peregrinus* though neither species was recorded during the PEA walkover survey. It was noted within most of the buildings numerous feral pigeons were breeding. The site was

Species specific bird surveys are outside of the scope of this assessment however several active nests were recorded during the 2025 Roost Presence/Absence Surveys. Works have the potential to impact these nesting features which could result in deliberate or unintentional damage or destruction of the nests or harm to the species which would constitute an offense under the Wildlife and Countryside Act of 1981 (as amended).

5.3 Other Protected Species

A badger sett is likely located within the surrounding area of the Site. The location is unknown as the badger sighting occurred during the during the 2025 Roost Presence/Absence Surveys for bats.

5.4 Impact Assessment

5.4.3 Roosting Bats

The proposed demolition and refurbishment works will result in the loss of a minimum of up to seven separate bat roosts (one maternity and six-day roosts) as well as any bats that may be hibernating within the buildings on Site. Given the connectivity and complexity of the buildings it is likely the Site functions as a multi-roost site, with different roosts used intermittently by different species. Without mitigation in place there is potential for roosting bats to be disturbed or

harmed / killed during the demolition and refurbishment of the buildings, and for the long-term loss of roost sites. In addition, there will be a loss of sheltering for foraging bats when weather conditions are poor, and connectivity.

The Proposed Works also have the potential to result in temporary disturbance to bats through increased lighting, noise, and vibration on foraging and commuting corridors. However, it is anticipated that during the main active bat season (April-October, inclusive), construction works will generally cease or be winding down before dusk when bats emerge and will not begin before dawn when bats return to roosts.

An EPSL will be required in order to lawfully mitigate and compensate for the loss of the roosts and mitigate potential impacts on bats in the wider area. The roosts supported low numbers of common and widespread species of bat, likely non-breeding females or lone males, such that they are considered to be of low conservation status. However, given the lack of other roosting opportunities in proximity to the Site, and the open nature of the surrounding area, the Site is considered to be locally important to bat species.

5.4.4 Nesting Birds

The construction phase of the Proposed Development will result in the refurbishment of buildings BB, BC, BD.1, BF.1, BF.3 which is considered to support nesting swift and the demolition of building BD.2 considered to support barn owl. There is, therefore, potential for direct adverse effects on nesting birds that are permanent in nature as a result of such works. Additionally, the refurbishment of building BC, BD.1, BF.1, BF.3 and the demolition of building BD.2 will result in the permanent loss of suitable nesting habitat for swift and barn owl that is considered likely to result in a minor adverse effect that is non-significant in isolation. Loss of suitable foraging habitat within the Site as a result of the Proposed Development is considered unlikely to be significant in isolation due to the extensive foraging habitat present within the surrounding landscape.

During operation, if habitats retained and/or planted during construction are not managed appropriately during operation, then there is the potential for additional loss of suitable foraging habitat from the Site. In the absence of mitigation, impacts upon swift and barn owl during the construction and operational phases of the Proposed Development are considered to be moderate adverse and significant.

5.4.5 Other protected species

While badgers are unlikely to be at the Site or utilizing resources within the Site the badger sighting during the roost presence/absence surveys suggests a badger sett is near the Site. As such, mitigation measures for the species during the construction phase needs to be considered.

6.0 Recommendations

6.1 Roosting Bats

6.1.1 Recommendation 1 – European Protected Species License

An EPSL must be obtained from Natural England prior to any demolition or refurbishment works on-Site. Due to the complexity of the buildings in relation to the identified roosts, such that all buildings with identified roosts will need to be included under licence. This will require adequate mitigation and compensation to be incorporated into the proposed development plan in order to negate any adverse impacts upon bats. Due to the size of the buildings and the complexity of the Site limiting surveyor ability to identify exact roost locations, the EPSL for Site will fall under The European protected species policies for mitigation licences Policy 4 as the due to the size and nature of the building the survey effort could be considered disproportionate.

Natural England will be expected to ensure that licensing decisions are properly supported by survey information, taking into account industry standards and guidelines. It may however accept a lower than standard survey effort where all the following apply:

- costs or delays associated with carrying out standard survey requirements would be disproportionate to the additional certainty that it would bring
- ecological impacts of development can be predicted with sufficient certainty
- mitigation or compensation will ensure that the licensed activity does not detrimentally affect the conservation status of the local population of any EPS

Policy 4 can be used to reduce the need for survey data. Instead, other sources of information to provide confidence for your approach.

A method statement will be prepared to detail the proposed working methodologies, timetable of works and mitigation measures to minimise the direct impact upon bats (these will be discussed with the Client and contractors prior to submission of the application). This should include supervision by a licenced bat ecologist, pre-commencement surveys, and sensitive working practices, as appropriate.

The proposed demolition and refurbishment of the buildings should be undertaken during the active bat season (April - October, inclusive). However, the works to BD.1 should be undertaken outside of the maternity period (March – April or September to October, inclusive).

6.1.2 Recommendation 2 – Winter Hibernation Surveys

The Envirotech NW Ltd. PEA assessed the overall Site to be of moderate suitability for hibernating bats and the large culvert under the Site carrying the River Colne was assessed to be marginally suitable for hibernating bats. The Futures Ecology PEA assessed a number of the buildings as having hibernation potential for bats particularly the basement / cellar of BF.1 and BD.1 as well as the stonework within many of the buildings on-Site. Additionally, the areas beneath the buildings BG, BK, BM, and BL within the culvert and area of the river that flows under building BE.1 were assessed as potentially suitable for hibernating bats.

Winter Hibernation Surveys are recommended in order to identify the presence of hibernating bats and/or evidence of bat occupation within the internal space of buildings on-Site as they have the potential to support winter roosting habitat. The surveys should be carried out in line with the Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023) by a suitably licensed ecologist. The surveys would involve two survey visits four weeks apart during the coldest months of the year (typically January and February) and involve a systematic inspection undertaken of all cracks, crevices and voids supported internally within the structures for evidence of bats or bat activity, such as droppings by a suitably licensed ecologist.

Following each inspection, static detectors should be set to record within the buildings and placed in a position raised off the ground. They should be left to record for a period of 14 nights to capture an appropriate sampling period since bats periodically arouse to drink and, if temperatures allow, to forage.

6.1.3 Recommendation 3 – Lighting Design

To prevent any adverse impact upon the potential roosting, commuting and foraging habitats for bats adjacent to the Site, any new or amended lighting for the Site must be functional and directional only and kept to a minimum servicing the public areas of the proposed development (as required for safety and security). It should be achieved through the use of baffles and screens, if necessary, to ensure no light spill onto waterbodies and any retained or planted vegetated corridors.

There are several methods by which light can be targeted and light trespass avoided to minimize adverse impacts to bats. Lamps with a low UV component should be used. Insects are particularly sensitive to UV light and are attracted in large numbers to lights with a high UV component. This has the effect of reducing insect availability in adjacent dark areas impacting the ability of light-avoiding bats to forage. Design of the luminaire, the luminaire aiming angles and optical control should be such as to reduce glare. If appropriate, physical barriers such as cowls, hoods, louvers and shields should be considered to avoid light trespassing onto vegetative corridors, and, the use of highly directional Light Emitting Diodes (LEDS) should be considered.

The detailed lighting strategy should be functional and directional and in line with current guidance (BCT and ILP, 2023). Habitat retained, enhanced or planted for roosting, foraging and/or commuting bats will need to be considered within a suitable lighting plan in order to be used by bats. Where designing with bats in mind:

- A warm white spectrum (ideally under 2700 Kelvin) should be used in order to reduce blue light component, therefore reducing the number of invertebrates attracted to the lights;
- Internal luminaires can be recessed where installed in proximity to windows to reduce glare and light spill;
- The use of specialist bollard or low-level downward directional luminaires to retain darkness above can be considered, although this has certain drawbacks and should only be used as directed by a lighting professional;
- Column heights should be carefully considered to minimise light spill;
- Any external security lighting should be set on motion-sensors and short (e.g. 1 minute) timers;
- Luminaires should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats;
- As a last resort, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed; and
- Where habitat needs to be unlit (e.g. important foraging and commuting corridors/roost sites), illuminance should be below 0.2 lux on the horizontal plane and below 0.4 lux on the vertical plane

6.1.4 Recommendation 4 – Post Development Enhancement

Following the issue of the revised NPPF (2023), by the Ministry of Housing, Communities and Local Government, *“Planning policies and decisions should contribute to and enhance the local environment by (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...”*. Mitigation bat boxes and features will need to be installed as part of any Licenced works, however, to comply with the NPPF, further enhancements must be provided, as such Lucion Delta-Simons recommends the following within areas of retained woodland in the wider extent of the Site:

- Mounted bat boxes within the Site that are to be retained (such as the Schwegler 1FF Flat Bat Box, or similar). The boxes should be erected at least 5 m from ground level in a south-east, south or south-west facing position, near vegetation, but with a clear flight path to the box. The boxes and flight paths to the box should remain unlit.
- New planting at the Site should aim to increase biodiversity and invertebrates by planting species known to be good for pollinators, which in turn will increase food availability for foraging bats.

6.2 Nesting Birds

6.2.1 Barn Owl Licence

A barn owl licence will need to be obtained from Natural England prior to the start of any works at the Site. Licences are location specific (site, county, region) and expire at the end of November every year. All appropriate measures must be taken to minimise disturbance. Licences are not typically issued for the removal or translocation of Barn Owls in order to facilitate development. Construction Phase

The construction phase will require the demolition and refurbishment of all the buildings on-Site; therefore, the Proposed Works should be undertaken outside of the core nesting period (late March through August, inclusive), and subsequent to a pre-commencement check for any nesting birds on-Site.

The barn owl nest will need to be checked by a suitable experienced ecologist holding a barn owl class survey license (CL29). Swift nests will need to be checked by a suitably trained ecologist. Temporary alternative nesting provision will need to be implemented prior to demolition and refurbishment of the buildings and protected throughout the construction phase. If any further evidence of active birds' nests is recorded during the Proposed Works, it is advised that works in the area be stopped immediately, and that Lucion Delta-Simons Ltd. be contacted for further advice.

6.2.2 Post-development Phase

Active bird nests will need to be compensated for, and a suitable number of nesting provisions should be installed in suitable locations to mitigate and enhance the nesting opportunities within the Site.

For barn owl, a nest box should be installed on top of roof of BD.2 (the building which the nest is currently located on) or an equally suitable location within the Site or within 200 m of the Site and managed appropriately for at least 30 years. Swift brick boxes on buildings BD.1, BF.1, BF.2 and BF.3 or an equally suitable location within the Site should be installed.

6.2.3 Recommendation 1 – Barn Owl Surveys

Barn owl surveys are recommended (March – August inclusive) in order to confirm breeding and determine the number of breeding pairs on-Site. Once this information is known, appropriate mitigation measures can be put in place during the construction and post-development phases.

6.3 Other Protected Species

In accordance with general good practice for sites where hedgehog and badger may occur, it is recommended that no excavations or trenches are left uncovered overnight during the development works in order to prevent any mammals from becoming trapped. Alternatively, ramps can be provided to enable them to climb out of trenches and excavations.

7.0 Disclaimer

The recommendations contained in this Report represent Lucion Delta Simon's professional opinions, based upon the information referred to in Section 1.0 of this Report, exercising the duty of care required of an experienced Ecology Consultant. Lucion does not warrant or guarantee that the Site is free of Bats or other protected species.

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Figure 1 – Site Location Map



Legend

 Site boundary

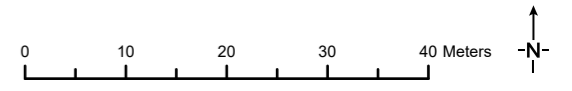


Figure **Site Location Plan**

Job **New Mills, Marsden**

Client **Rex Procter & Partners**

Figure No.	1	Revision	A	Date	12/09/2025
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Figure 2 – Site Layout Plan



Legend

 Site boundary

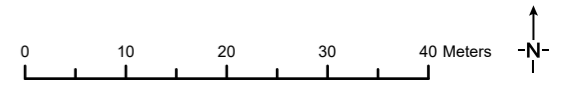


Figure	Site Layout		
Job	New Mills, Marsden		
Client	Rex Procter & Partners		
Figure No.	2	Revision	A
		Date	23/10/2025
Drawn	JV	Checked	JG
		Scale	1:750 @ A3
Job No.	133460.678976		Central GR
			405022E 411696N



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Figure 3 - Location of Surveyors and Results of the Dusk Emergence on the 24th of June 2025



Legend

- Site boundary
- ✕ Surveyor position
- Bat heard not seen
- Bat seen not heard
- ➔ Foraging
- ➔ Emergence
- ➔ Commuting

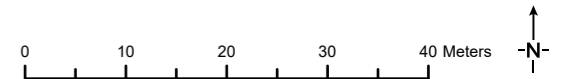


Figure Location of Surveyors and Results of the Dusk Emergence on the 24th of June 2025

Job New Mills, Marsden

Client Rex Procter & Partners

Figure No.	3	Revision	A	Date	21/10/2025
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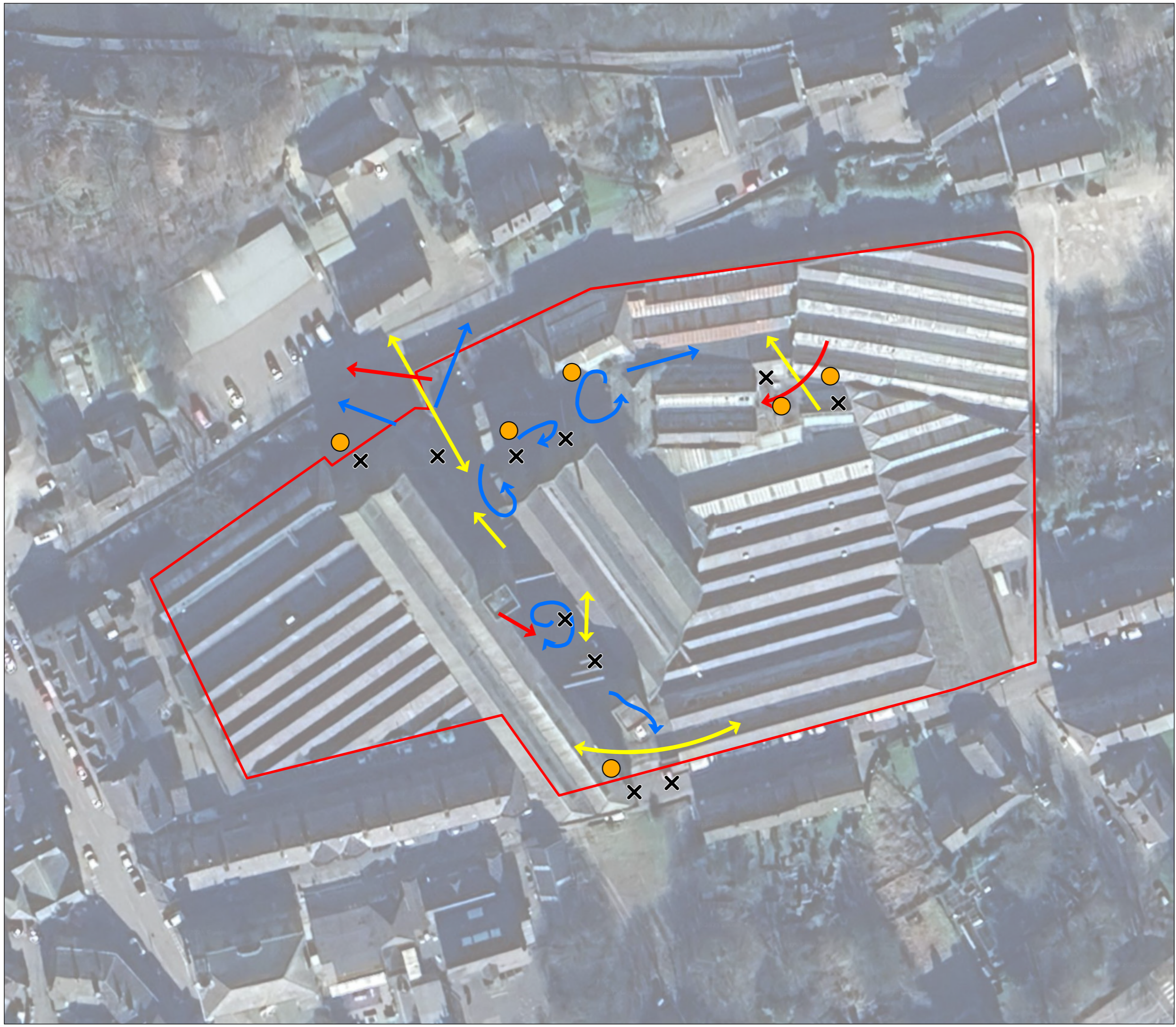


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Figure 4 – Location of Surveyors and Results of the Dusk Emergence Survey on the 25th of June 2025



- Legend**
- Site boundary
 - Bat heard not seen
 - ✕ Surveyor position
 - ➔ Foraging
 - ➔ Commuting
 - ➔ Emergence

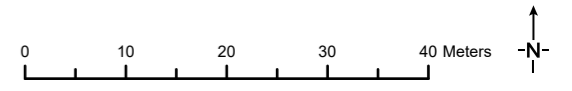
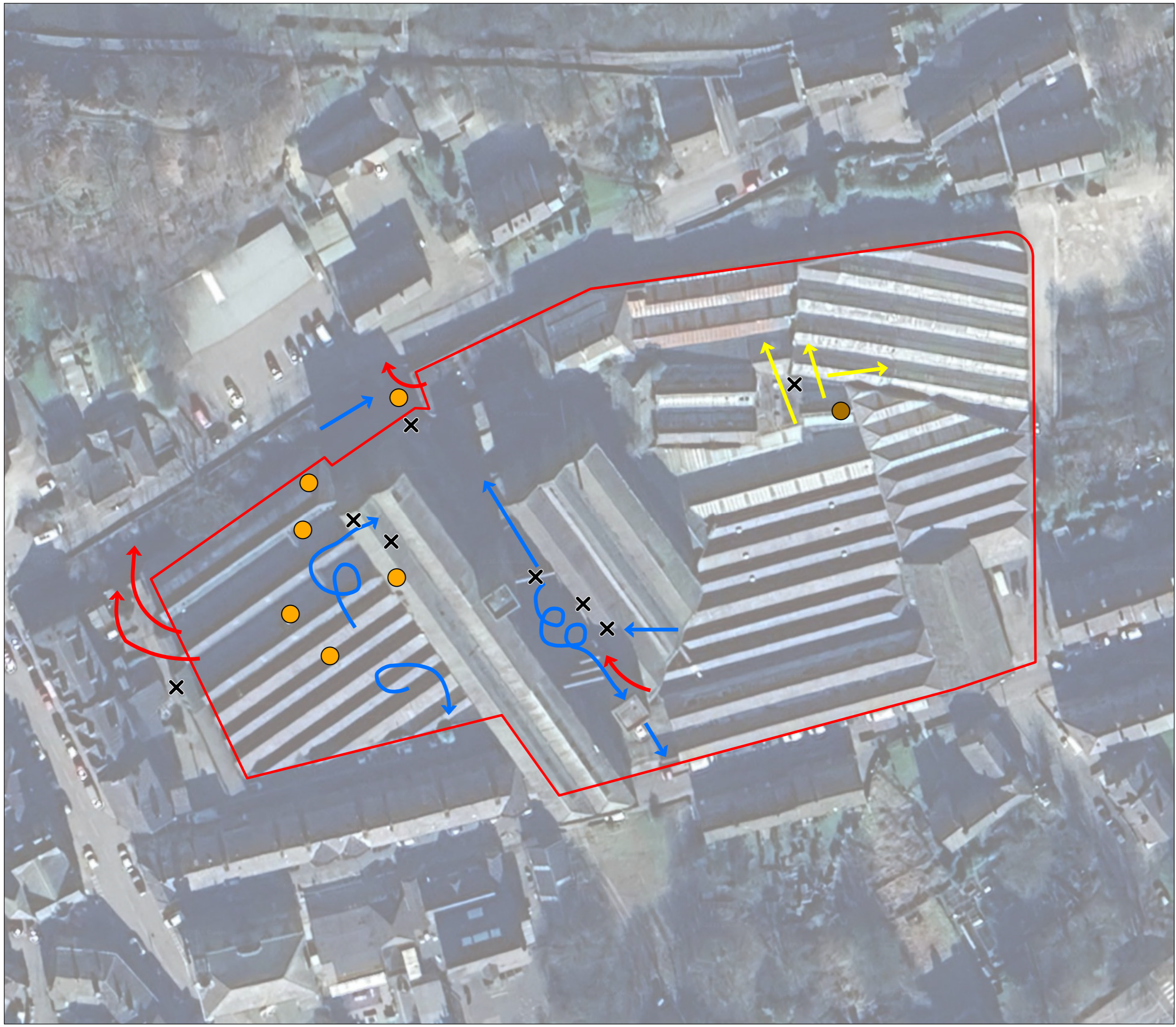


Figure Location of Surveyors and Results of the Dusk Emergence Survey on the 25th of June 2025			
Job New Mills, Marsden			
Client Rex Procter & Partners			
Figure No.	4	Revision	A
		Date	21/10/2025
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		Scale	1:750 @ A3
Job No.	133460.678976		Central GR 405022E 411696N



Figure 5 – Location of Surveyors and Results of the Dusk Emergence Survey on the 16th of July 2025



- Legend**
- Site boundary
 - X Surveyor position
 - Bat heard not seen
 - Bat seen not heard
 - ➔ Foraging
 - ➔ Emergence
 - ➔ Commuting

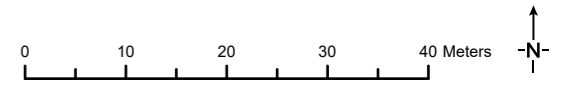


Figure Location of Surveyors and Results of the Dusk Emergence Survey on the 16th of July 2025

Job New Mills, Marsden

Client Rex Procter & Partners

Figure No.	5	Revision	A	Date	20/10/2025
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Figure 6 – Location of Surveyors and Results of the Dawn Return Survey on the 5th of August 2025



Legend

- Site boundary
- ✕ Surveyor position
- Bat heard not seen
- Bat seen not heard
- ➔ Commuting
- ➔ Return
- ➔ Foraging

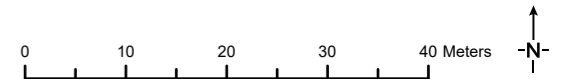


Figure Location of Surveyors and Results of the Dawn Return Survey on the 5th of August 2025

Job New Mills, Marsden

Client Rex Procter & Partners

Figure No.	6	Revision	A	Date	20/10/2025
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Figure 7 – Location of Surveyors and Results of the Dusk Return Survey on the 5th of August 2025



- Legend**
- Site boundary
 - ✕ Surveyor position
 - Bat heard not seen
 - Bat Seen Not Heard
 - Commuting
 - Emergence
 - Foraging

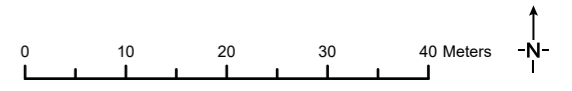


Figure Location of Surveyors and Results of the Dusk Emergence Survey on the 5th of August 2025

Job New Mills, Marsden

Client Rex Procter & Partners

Figure No.	7	Revision	A	Date	20/10/2025
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Figure 8 – Bat Roost Locations 2025



Legend

- Site boundary
- ★ Maternity Roost
- ★ Day Roost

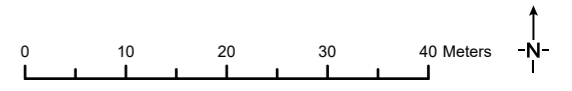


Figure			Bat Roost Locations
Job			New Mills, Marsden
Client			Rex Procter & Partners
Figure No.	8	Revision	A
		Date	23/10/2025
Drawn	JV	Checked	JG
		Scale	1:750 @ A3
Job No.	133460.678976		Central GR
			405022E 411696N



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Figure 9 – Active Bird Nest Locations and Mammal Sighting 2025



Legend

- Site boundary
- Barn Owl
- Swift
- Barn Owl Roost
- Badger sighting

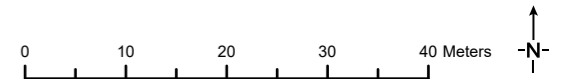


Figure Active Bird Nest Locations and Mammal Sighting 2025			
Job New Mills, Marsden			
Client Rex Procter & Partners			
Figure No.	9	Revision	A
		Date	23/10/2025
Drawn	GC	Checked	JG
		Scale	1:750 @ A3
Job No.	133460.678976		Central GR 405022E 411696N



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