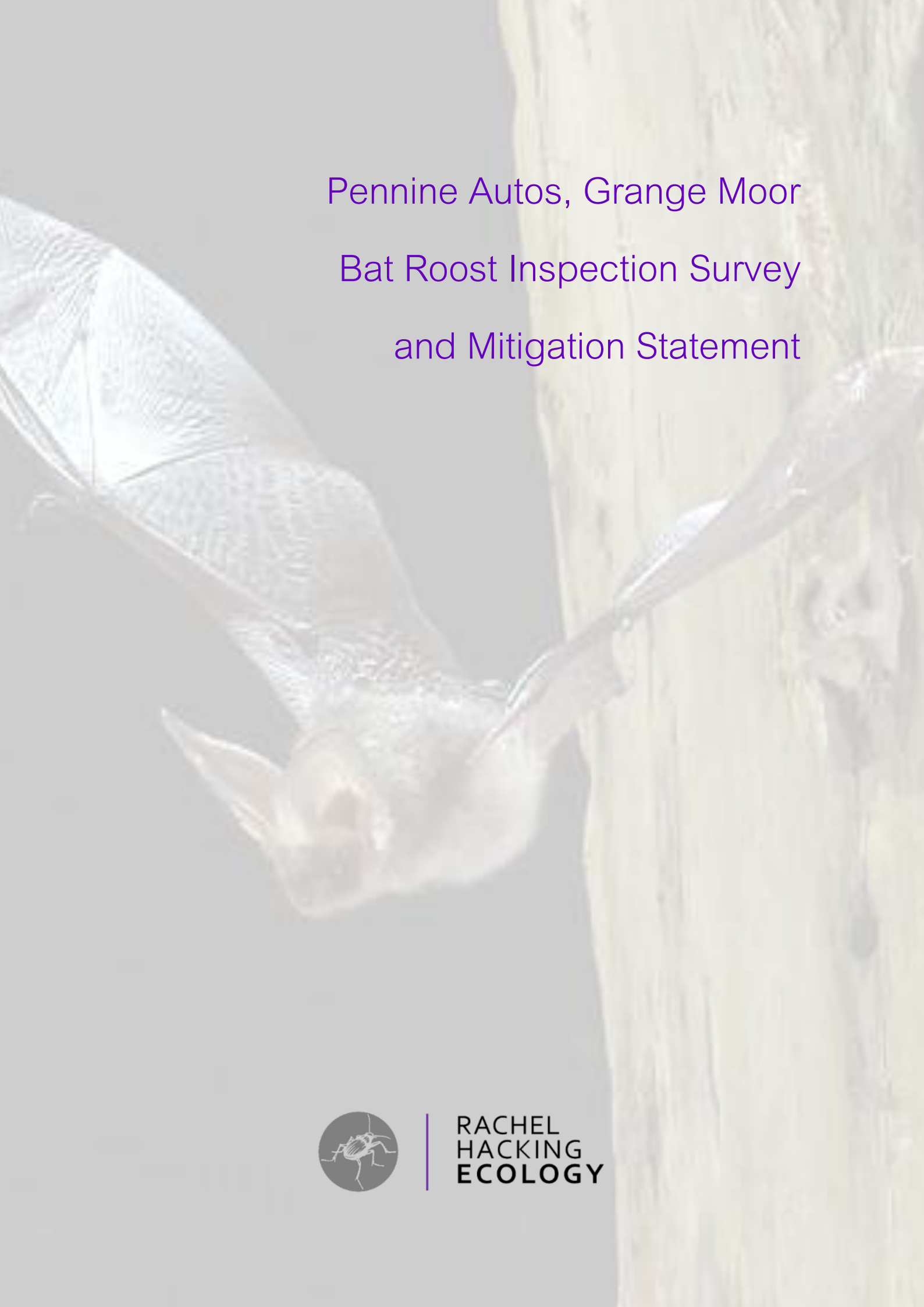


# Pennine Autos, Grange Moor

# Bat Roost Inspection Survey

# and Mitigation Statement

RACHEL
HACKING
ECOLOGY

| | |
|---|---|
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| Project Title | Pennine Autos, Grange Moor |
| Project Reference | RHE.4720 |
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# 1. Introduction

## 1.1 Project Brief

1.1.1 Rachel Hacking Ecology Ltd was commissioned in January 2026 by Atlas Retailers Ltd to provide ecology consultancy services to support the discharge of condition for an approved change of use application at Pennine Autos, Wakefield Road, Grange Moor, OS Grid Reference: SE 21959 15466, hereafter referred to as the 'site'.

1.1.2 This commission was to undertake a bat roost 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 Bat Roost Suitability Assessment, undertaken in October 2023 (Brooks Ecological, 2023) 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 buildings of A, C and D were of 'Low' suitability, building B of 'Negligible' suitability, and buildings E and F are of no suitability.

1.2.2 Subsequently, the assessment was submitted to Kirklees Council to inform the application for the re-development of the site. The proposals are a change of use to car dealership, erection of extensions, alterations to existing buildings and alterations of hard standing (Planning reference 2023/62/92129/E).

1.2.3 Condition 3 of the approval states:

*'Prior to development commencing, an up-to-date bat emergency survey and mitigation method statement, further to the recommendations contained within the Bat Roost Suitability Assessment ref. ER-7129-01 shall be submitted to, and approved in writing by, the Local Planning Authority. This shall include consideration as to whether a European Protected Species (EPS) licence is required to facilitate the development. Thereafter the development shall be undertaken in accordance with the findings and recommendations of the approved documents.'*

1.2.4 In addition, Condition 19 of the approval states:

*'Prior to the hereby approved development being brought into use, details of the provision of two bat boxes within the site shall be submitted to, and approved in writing by, the Local Planning Authority. This shall include the location (and height) and specification of the proposed bat boxes. The bat boxes so approved shall be installed before the development is brought into use, and they shall thereafter be retained.'*

1.2.5 Additionally, Condition 12 refers to the provision of a bat sensitive lighting strategy, which is supplied separately.

## 1.3 Aims

1.3.1 As the planning conditions 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.

1.3.3 Ultimately, the survey provides additional information to allow the discharge of Conditions 3 and 19 allowing the proposed development 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 (2025)[2]. The survey was undertaken by Amy Donaldson (Senior Ecologist) and 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, fascias and cladding 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 features of the buildings.

2.1.4 There were no access constraints to the survey, and every niche feature was fully inspected via endoscope, including masonry gaps, raised flashing/cladding, gaps behind metal facias/barge boards, gaps under roller doors and gaps between roofing sheets.

## 2.2 Assessment Criteria

2.2.1 Surveys were undertaken in accordance with current guidelines[1] . Interpretation of survey findings and assessment of roosting suitability was undertaken using professional judgement and criteria described in published guidance[2]

2.2.2 The detailed inspection has allowed for a refinement of the assessment of building suitability, which is provided individually for all buildings on site. The buildings are labelled in Plate 1 below.

[1] Collins, J. (Ed.) (2025) *Bat Surveys for Professional Ecologists-good practice guidelines. 4th edn.* The Bat Conservation Trust, London.

[2] Reason, P.F. and Wray, S. (2025). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.2. Chartered Institute of Ecology and Environmental Management, Ampfield.




**Plate 1**: Building numbers (plan from Bat Roost Suitability Report, Brooks Ecological, 2023). Please note that the Red Line Boundary is not correct.

## 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 roofing sheets, these were examined by torch if they extended beyond endoscope range.

2.3.2 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 Grange Moor surrounding the site to the south and east. To the north and west the landscape is dominated by pastoral land with parcels of woodland. There is a network of hedgerows and drainage ditches present which may provide some foraging and commuting habitat, although this is likely to be of low to moderate value. A drainage pond is present just to the north of the site and allotments are located adjacent to the east of the site.

3.1.2 It is likely that any bats roosting on site would utilise the foraging opportunities around the pond, woodlands and hedgerows as well as nearby allotments and gardens within the village. Properties within Grange Moor are likely to offer some bat roosting opportunities, of which the occupied houses are likely to have preferable thermal characteristics which are typically favoured by bat maternity colonies, albeit the buildings are of predominantly modern construction and so roosting opportunities may be limited.

3.1.3 The site is well lit to the south and east from both street lighting and security lighting. The northern aspect is likely to have occasional lighting disturbance although this is not constant.

## 3.2 External Survey

**Building A**

3.2.1 The main building on site is a former car showroom of modern construction. The building is two-storey and brick-built, clad with corrugated steel sheeting on the 2$^{nd}$ storey with a stepped, single-pitched roof sloping north. The brickwork is in good order, and the windows/doors are well sealed.

3.2.2 The building is co-joined with Buildings B, C and D. The union with Building B is fully sealed and does not provide any PRFs; the junction of Buildings C and D is open above narrow timber beams and access is possible to the north (Plate 2). The resulting cavity is extensive but too wide and thermally unregulated to support bats (Plate 2).



**Plate 2**: Showing the join between Buildings A and D (left) and resulting cavity (right).

3.2.3 Gaps are present along the fascia where the cladding joins (Plate 3), which may be of a suitable size to support bats, but the fascia is metal and therefore thermally unstable. No signs of bat presence were noted during the endoscope survey.



**Plate 3**: Gaps under the fascia where the cladding joins to the east of the Building A.

3.2.4 There are four roller shutters on the southern aspect and another on the eastern aspect, all of which may facilitate bat access, however, the cavity at the top of the doors is too open to support roosting bats and there lacks suitable roof lining to support roosting internally,

**Building B**

3.2.5 This building is the canopy over the forecourt to the south of Building A. The canopy is supported by steel columns and is clad in corrugated metal to all sides. The union with Building A is fully sealed and provides no access nor PRFS.

3.2.6 Where columns and light fixings under the structure meet the cladding, small gaps are present, however these are very shallow (<10cm deep) and are considered unsuitable as PRFS.

3.2.7 There are small gaps along the fascia boards to all sides; these are particularly prevalent on the most southern aspect as the panels align adjacent to the fascia resulting in access to a good cavity that is of a suitable size for bats (Plate 4). During the endoscope survey the whole feature was searched and no signs of bat presence were found.



**Plate 4**: Gaps on the western aspect of Building B (left) and on the southeastern corner (right).

**Building C**

3.2.8 An extension to the rear of the building which joins to Building A at single storey roof level. The building has coursed breezeblock walls with corrugated steel roofing. A shale slip façade has been installed which is now in a state of disrepair. All gaps between the corrugation have been sealed with expanding foam (Plate 5).

3.2.9 There is a large cavity to the south of the building, which continues horizontally through the entire structure (Plate 5). Cobwebs were noted at the entrance to the cavity, and the cavity is likely too exposed to support roosting bats. No signs or evidence of roosting bats were noted during the survey.



**Plate 5**: Infilled gaps under corrugated roofing sheets on Building C (left). Cavity to the south (right).

**Building D**

3.2.10 Another extension to the rear of Building A, similar in construction to that of Building C although the entirety of the structure is clad in corrugated steel sheeting. All gaps formed at the ends of the sheets are filled with expanding foam (Plate 5). Some gaps under the fascia were present however these were relatively shallow (<7cm) and no bat evidence was recorded.

3.2.11 Two large structural beams protrude from the northern corners of the building. Gaps around the beams (Plate 6) provide potential bat access to a lengthy cavity which may be a suitable size to support roosting bats. Thorough inspection using the endoscope and torch showed no signs of usage by bats.




**Plate 6**: Infilled gaps under metal roofing on Building D (left) and the cavity between structural support and cladding (right).

**Building E**

3.2.12 Replaced since the previous survey, this structure is a steel single-storey portacabin, with lightly corrugated walls and roofing. There are shallow gaps where metal sheeting joins, however this is unlikely to be suitable for roosting bats due to the variable thermal conditions beneath the steel sheets.

**Building F**

3.2.13 No longer present.

# 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 roosting bats with the exception of some very low suitability features on Buildings B (gap behind fascia) and Building D (gap behind structural supports). None of the buildings are 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. Furthermore, no evidence of recent/current roosts was recorded, despite an exhaustive survey.

## 4.2 Assessment of Impacts

4.2.1 The proposals will involve re-roofing and refurbishment of Building B, recladding of Building C and D, partial demolition of Building A and erection of a side extension to Building A. Building E will be removed.

4.2.2 Collectively, the proposals are highly unlikely to result in any disturbance to bats or destruction of bat roosts, and an EPS licence is not required, given the absence of any evidence of roosting observed by the roost survey.

4.2.3 Should the proposed works proceed imminently, no adverse impacts would occur. However, precautionary mitigation is recommended as there remains a residual, minor risk of occasional day use by single bats within Buildings B and D, whereby adverse impacts could occur should development proceed when bats are active (spring-autumn).

4.2.4 The site lighting scheme is not expected to result in increased lighting and hence adverse impacts to bats across the site, further details are provided in the separate lighting scheme report.

## 4.3 Mitigation Statement

4.3.1 Precautionary mitigation in the form of supervision by a Licenced Bat Ecologist is provided to further reduce the risk of incidental harm to bats or damage to their roosts if roosting occurs during the bats active season. In the event that works to the roof structure of Buildings B and D can be undertaken prior to April, no such mitigation is required, and the works can proceed without further ecological input.

4.3.2 The following precautionary measures therefore relate solely to works to the roofs of Building B and D which are to occur during the period from **April – September** inclusive.

- Should works occur during the bat active period, a Licensed Bat Ecologist will supervise works to the roof structure of Buildings B and D which could influence the features identified, to include removal of roofing material using hand tools only.
- The Licenced Bat Ecologist will perform a final check of such features within the roof structures of Buildings B and D, using an endoscope and torch, as required.
- Prior to such work commencing, a toolbox talk will be given to all site contractors by the ecologist, setting out the methods to be followed, relevant bat legislation and the protocols to follow if a bat is found during works.
- No hammering, beating or drilling of materials will be undertaken in the vicinity of the identified features, all materials will be removed by careful levering away following removal of fixings.
- All roofing materials will be lowered to the ground and will not be allowed to fall.
- All works will be done during daylight hours.
- **Should any bats be identified within the buildings during works, all works must cease**.
- In this event, the roost feature will be re-instated under the supervision of the Licenced Bat Ecologist and appropriate EPS licensing must then be sought prior to re-commencement of works.
- Accordingly, any works which could influence the integrity of the roost would be delayed until the EPS licence is in place.

4.3.3 Regardless of the timing of the proposed, consented works; as an enhancement measure, two woodcrete bat boxes will be installed on the western gable/eaves of Building A following completion of the roofing works and prior to the buildings being brought into use.

4.3.4 Boxes will be Schwegler 1FF Flat Bat Box or similar.

4.3.5 The bat boxes will be installed under the supervision of a suitably qualified (and ideally bat-licensed) ecologist.

4.3.6 The bat boxes will be repaired or replaced as necessary for the lifetime of the development.

# 5. Conclusion

5.1.1 The detailed inspection has not identified any evidence indicating use of the buildings by roosting bats. A number of precautionary mitigation measures have been proposed in a Mitigation Statement as is required by planning condition 3, including supervision of works to Buildings B and D by a Licenced Bat Worker, in the event that the works are to be undertaken during the active season for bats (April – September inclusive).

5.1.2 Specifications are also provided for two bat boxes to be installed on the western facing gable of Building A, to be retained for the lifetime of the development, in compliance with planning condition 19.

5.1.3 A Mitigation Licence is not necessary based on the results of the detailed roost survey undertaken during January 2026. However, in the unlikely event that a new roost is recorded during the supervision of consented works to the buildings, such works will cease until an appropriate EPS licence is granted.

# 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.