



PRECAUTIONARY WORKING METHOD STATEMENT – BATS

SITE NAME & ADDRESS	Turnbridge Mills, Quay Street, Huddersfield, HD1 6QT
PLANNING APPLICATION REF.	2025/62/91122/W
DEVELOPMENT PROPOSAL	Redevelopment of site for mixed-use
DATE	18 March 2026

1. INTRODUCTION

Knight Sky Ecology was commissioned to provide ecological consultancy services in relation to the development proposals at Turnbridge Mills. The development received planning permission on 13 March 2026.

The submission of a Precautionary Working Method Statement (PWMS) in respect of bats is required to discharge Condition 36 of the planning permission.

This PWMS has been produced for **non-licensable activities**, i.e., precautionary working measures for buildings where bat roosts have been assessed as absent but where a low residual risk remains. The aim of the PWMS is to manage this residual risk.

Planning Condition 35 covers all licensable activities, i.e., buildings where bat roosts have been confirmed present. All licensable activities will require a European Protected Species (EPS) mitigation licence issued by Natural England.

This Method Statement has been authored by Ryan Knight BSc (Hons) MCIEEM, who holds a Level 2 Natural England Class Licence for bats (ref. 2015-12611-CLS-CLS) and has held this licence for over 13 years. Ryan has also acted as the named ecologist on more than 17 mitigation licences issued by Natural England, covering several bat species and roost types including maternity, hibernation, day and feeding roosts.



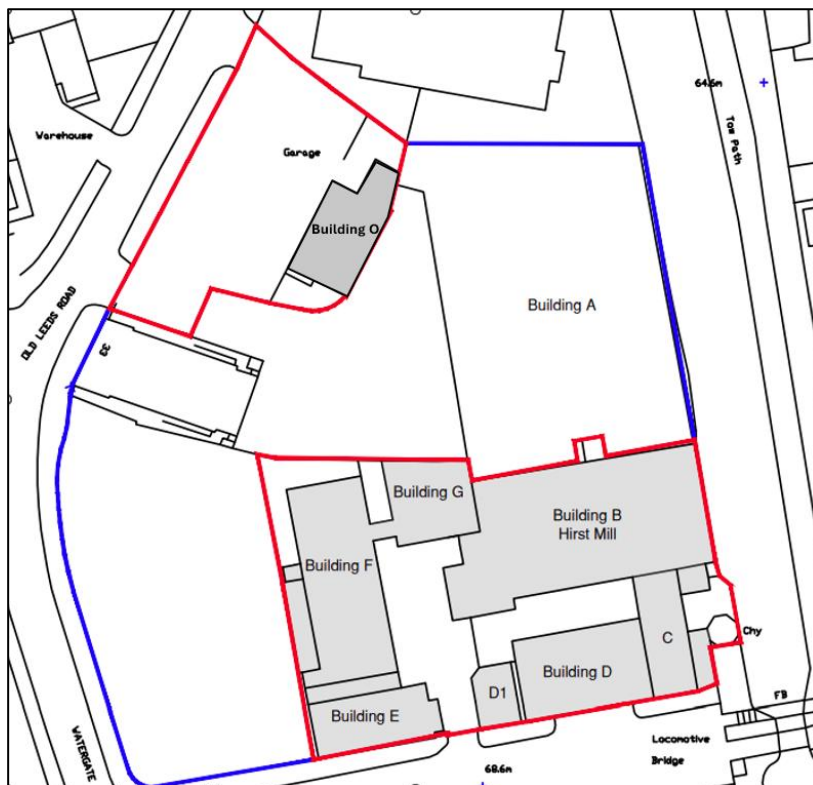
2. BACKGROUND

Existing Data

Bat surveys of all buildings were completed in 2025 (Knight Sky Ecology, 2025). Building B and Building F have been confirmed to support common pipistrelle roosts (a single bat in each roost). The roosts were recorded in only one of three surveys undertaken.

No evidence of a bat roost was observed in Buildings C, D, D1, E, G and O. The surveys conducted on these buildings are considered sufficient to conclude that bat roosts are absent. Given the nature of bats, there will always be a low residual risk of encountering a bat during such works – therefore, PWMS is required. A building plan is provided below for context.

Figure 2.1. Building layout



Legislation

All bat species in England are listed in Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) (WCA) and Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the Habs Regs). In simple terms, these legislative acts make it an offence to:

- Kill, injure or capture a bat.
- Damage or destroy a bat roost (a place used for shelter and protection). The roost is protected even when unoccupied.
- Obstruct access to a roost.
- Disturb a bat whilst within the roost.

There are different definitions of what constitutes disturbance within the WCA and Habs Regs.



3. PRECAUTIONARY WORKING METHOD STATEMENT

Timing

All works affecting buildings will be conducted between April and October 2026. This coincides with the main bat activity season. The hibernation period (November to March) will be avoided.

Ecological Clerk of Works (ECoW)

It can be confirmed that an ECoW from Knight Sky Ecology has been appointed for the project. The ECoW will oversee all biodiversity-related aspects of the project throughout the duration of the construction programme. The role of the ECoW is to advise on how works should be undertaken in accordance with the relevant good practice, precautionary working measures, legislation and mitigation and to monitor compliance with all measures as set out. Where risks are not being appropriately managed, or unforeseen risks emerge, the ECoW has the power to stop works if necessary. The ECoW will report to and provide any requirements for remedial action to the Contractor's Project Manager who would be responsible for implementation. The responsibilities of the ECoW are to include (but not limited).

- Review and assessment for necessary pre-commencement checks, identification of mitigation including task-specific areas.
- An assessment of all areas of the buildings in which there is a low residual risk of bat presence and supervision of activities where required (i.e., within any areas which pose a risk of impact to bats).
- Delivery of inductions and toolbox talks to contractors in order to explain the ecological sensitivities of the site and the precautionary working measures to be adopted in relation to bats in line with this PWMS.
- Ensure completion of the toolbox talk signature sheet.

To help maintain clarity on the requirements of the PWMS, the appointed contractor is to nominate a Site Environmental Advisor who will liaise with the ECoW with respect to the programme and required inductions. The Environmental Advisor will be the first point of contact should an issue arise when the ECoW is not present.

Method Statement - Buildings C, D, D1, E, G and O

- 1) Prior to commencement, all contractors are to be fully briefed by the ECoW before works commence in order to explain the presence of bats, their legal protection, roles and responsibilities, the proposed method of working and procedures should bats or evidence of bats be found.
- 2) A pre-works inspection of the buildings is to be undertaken by the ECoW prior to the works on each building. This should be in the form of a visual inspection if sufficient access is possible.
- 3) The ECoW will monitor the work in all 'risk' areas of the buildings. This is to include the careful hand stripping of such features as roof slates and bargeboards.
- 4) Visual checks and additional care will be taken on areas of stonework where there are recessed cavities.
- 5) Once all residual risks for a particular building or area have been mitigated, the ECoW will sign-off the works from any further supervisory requirements.
- 6) There will be regular correspondence between the ECoW and Site Environmental Advisor.



- 7) In the unexpected event that a bat is discovered, contractors will be advised to contact the licensed ecologist who will travel to site to collect it. Contractors will be specifically forbidden to handle bats. Contractors will be advised that if it is necessary to remove a bat to avoid it being harmed, gloves **MUST** be worn. It should be carefully placed in a cardboard box and kept in the dark in a quiet place until the licensed ecologist arrives on site.



4. TOOLBOX TALK: PROTECTED SPECIES - BATS

- **Project Name:** TURNBRIDGE MILLS
- **Date:**
- **Time:**
- **Presenter/ECoW:**

Attendee Signature List:

Print Name	Company	Signature

By signing above, I confirm I have received this toolbox talk and understand the procedures to follow