

Development Management
Kirklees Council
PO Box 1720
Huddersfield HD1 9EL

Dear Sir/Madam,

Re: Proposed demolition of existing stable block and erection of a new stable block at Copley Farm.

I write on behalf of our client, Mr Massey, in connection with the above proposal. The purpose of this letter is to set out why, in our professional opinion, a dedicated bat survey is not necessary to validate or determine this application, and to submit photographic evidence of the building in support of that position.

Policy and legal context

We are mindful that all bat species and their roosts are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), and that the presence of protected species is a material consideration in the determination of a planning application. Chapter 15 of the National Planning Policy Framework and Policy LP30 of the Kirklees Local Plan require the conservation and enhancement of biodiversity to be taken into account.

We also note, however, that national Planning Practice Guidance is clear that information requirements should be proportionate to the scale and nature of the proposal, and that a protected-species survey should only be sought where there is a reasonable likelihood of the species being present and affected by the development. It is on that basis — the absence of a reasonable likelihood of bats being present — that this letter is submitted.

The building and the proposed works

The structure affected is an existing single-storey, timber-framed and timber-clad stable block. Its roof comprises corrugated fibre-cement (profiled cement) sheeting laid directly over timber purlins. Critically, the building has:

- no loft, ceiling or enclosed roof void — the underside of the roof sheets is open to the interior throughout;
- no continuous sarking felt or breather membrane providing a sound, enclosed lining; and
- no traditional masonry or stone construction of the type associated with higher bat-roosting potential.

The proposal is to demolish this structure and erect a new stable block in its place.

Assessment of bat roosting potential

Bats require dark, sheltered, draught-free and thermally stable features in which to roost. As the enclosed photographs demonstrate, the building exhibits the opposite characteristics and is in an advanced state of disrepair:

- multiple displaced, broken and weathered roof sheets, with open gaps and substantial daylight ingress at the eaves and within the roof slope;
- degraded, torn roofing membrane offering no sound enclosed lining or crevice features in regular condition;
- a consequently draughty, well-lit and thermally unstable interior; and
- extensive, intact and undisturbed spider webbing throughout the roof structure — an informal but telling indicator that the crevices present are not in active use.

Assessed against the building-suitability categories in the Bat Conservation Trust's Bat Surveys for Professional Ecologists: Good Practice Guidelines, the building presents low suitability for roosting bats, at the lower end of that category. There is no reasonable likelihood of a roost being present.

We are aware of the Minimum Standards for Bat Surveys in West Yorkshire and of the guidance to planning officers that, for minor applications affecting a roof, photographs of the affected roof may be submitted to enable the authority to determine whether a Preliminary Roost Assessment is required. The enclosed photographs are provided for precisely that purpose, and we consider that they clearly demonstrate the building's low potential.

Conclusion and request

Given the building's lightweight construction, its open and derelict condition, and the absence of any enclosed roof void or suitable stable crevice features, there is no reasonable likelihood of a bat roost being present. A dedicated bat survey would, in our view, be disproportionate to the nature of this proposal. We therefore respectfully request that the application be validated and determined without a bat survey, on the basis of the enclosed photographic evidence.

As a precautionary measure, our client is content for the following to be secured by condition or informative: should any bat, or evidence of a bat roost, be discovered at any point during demolition or construction, all works affecting that feature will cease immediately and the advice of a suitably qualified ecologist (and, where necessary, Natural England) will be sought before those works recommence.

We trust this is sufficient to allow the application to proceed, but would of course be pleased to discuss the matter further or to provide any additional information required.

Yours faithfully,

Edward Park

Director

PARKdesigned Architects

Enc: Site photographs (4 no.) — see Appendix A

Appendix A — Site photographs

Copley Farm — existing stable block proposed for demolition



Photograph 1 — External elevation: weathered corrugated fibre-cement roof sheets laid over timber purlins; no enclosed roof void.



Photograph 2 — Roof condition: weathered and locally displaced fibre-cement sheets; open, lightweight timber structure.



Photograph 3 — Internal view: open underside of roof with torn lining, daylight ingress through gaps and extensive intact cobwebbing.



Photograph 4 — Eaves detail: degraded, torn roofing membrane and open gaps to the sky at the roof edge.