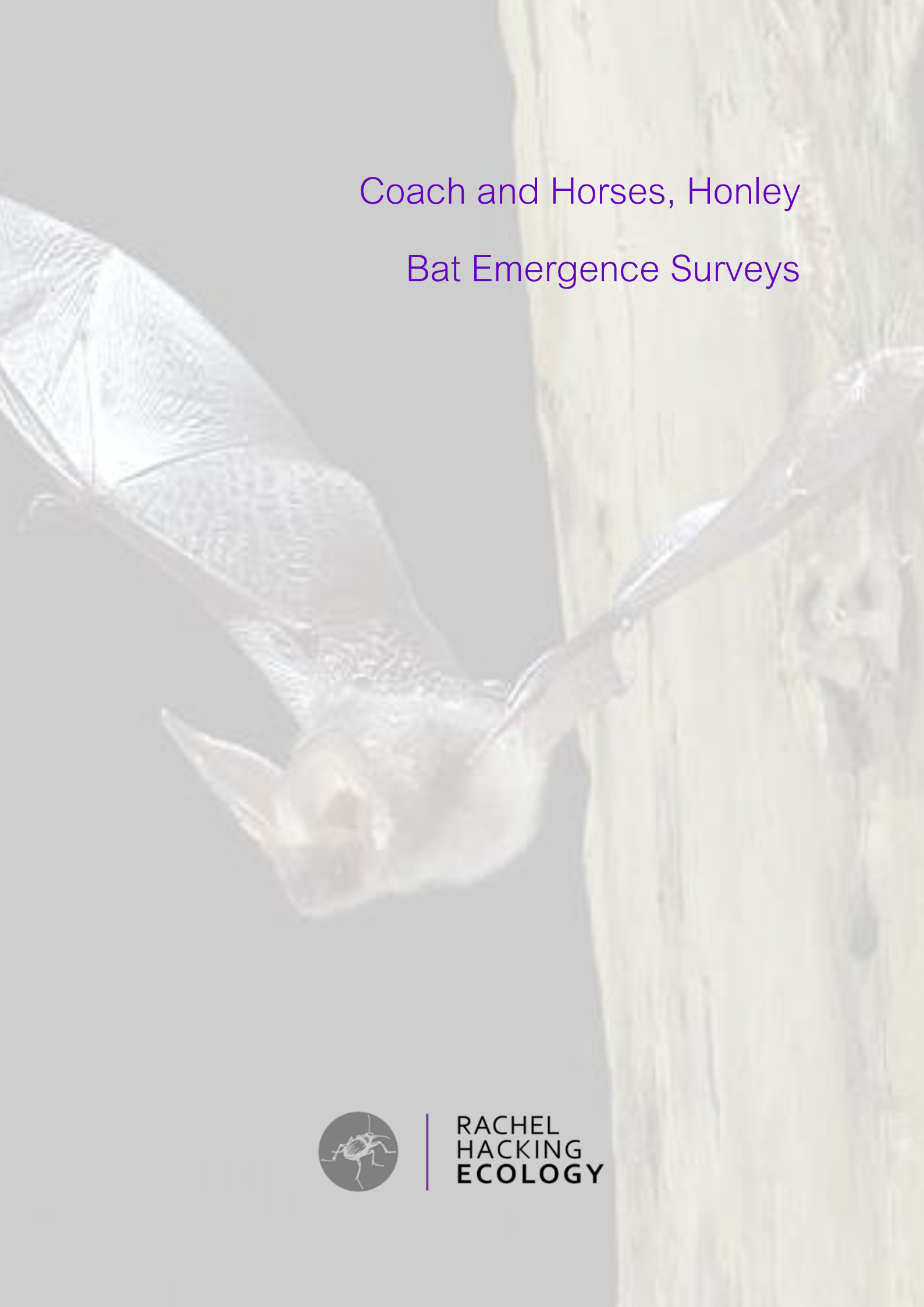

Coach and Horses, Honley

Bat Emergence Surveys

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Client	Cairn Cross
Project Title	Coach and Horses, Honley
Project Reference	RHE.4698
Project Leader	Tim Palmer
Contact Details	Tim@rachelhackingecology.co.uk

	Name	Position	Date
Author	Tim Palmer	Technical Director	26/06/2026
Reviewer	Amy Donaldson	Senior Ecologist	26/06/2026
Approved by	Simon Holden	Regional Manager	26/06/2026

RACHEL HACKING ECOLOGY

The Stables
Paradise Wharf
Ducie Street
Manchester
M1 2JN

0161 465 8971

www.rachelhackingecology.co.uk

mail@rachelhackingecology.co.uk

Report Contents

1. Introduction

1.1 Project Brief

1.1.1 Rachel Hacking Ecology Ltd was commissioned in December 2025 by Cairn Cross to undertake bat emergence surveys at the now disused, former Coach and Horses public house, Eastgate. Honley, hereafter referred to as the 'site'.

1.2 Background and Aims

1.2.1 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]). Subsequently a detailed inspection was undertaken during winter 2025 from a Mobile Elevated Working Platform (MEWP). Folling this the development received planning consent (2025/62/93126/W) from Kirklees Council subject to a number of conditions. The relevant conditions relating to bats are provided below:

Planning Condition 4.

No development shall take place in any circumstances unless and until a scheme has been submitted to, and approved in writing by, the Local Planning Authority which includes details of three (3.no) bat emergence surveys completed within the bat survey season (1st May to 31st August inclusive), timeframe for phasing of the development works and either: a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 authorising the specified activity/development to go ahead; b) written confirmation of Site Registration under the Bat Mitigation Class Licence or Earned Recognition Scheme; c) a statement in writing from the relevant licensing body to the effect that it does not consider that the specified activity/development will require a licence. The development shall be undertaken in accordance with the approved scheme and retained thereafter.

Planning Condition 5.

One bat box shall be incorporated into the development hereby approved; the box shall be long-lasting Schwegler `woodcrete' type or similar and shall be located away from sources of light. The bat box shall be provided prior to first occupation of the development hereby approved and thereafter be retained for the lifetime of the development.

1.2.2 During the MEWP inspections, several bat roost locations was confirmed within the exterior roof/wall structure of the buildings and emergence surveys have been carried out in order to characterise the roost status and to advise on licensing requirements.

[1] Eco 360 (2025) Preliminary Ecological Appraisal

2. Methods

2.1 Emergence Surveys

2.1.1 Three emergence surveys were undertaken over four nights on 7th/11th May (V1), 2nd June (V2) and 22nd June (V3). The surveys were undertaken in accordance with the Bat Conservation Trust's Bat Surveys for Professional Ecologists: Good Practice Guidelines (2023)[2] and were led 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 Five surveyors were deployed on each survey visit, all of which were support by Night Vision Aids (NVAs). The surveyor/NVA locations are shown below (Plate 1). The surveyors were aided by the use of time expansion and/or frequency division ultrasound bat detectors. All surveyors were trained in bat survey techniques and have >2 years of bat survey experience.

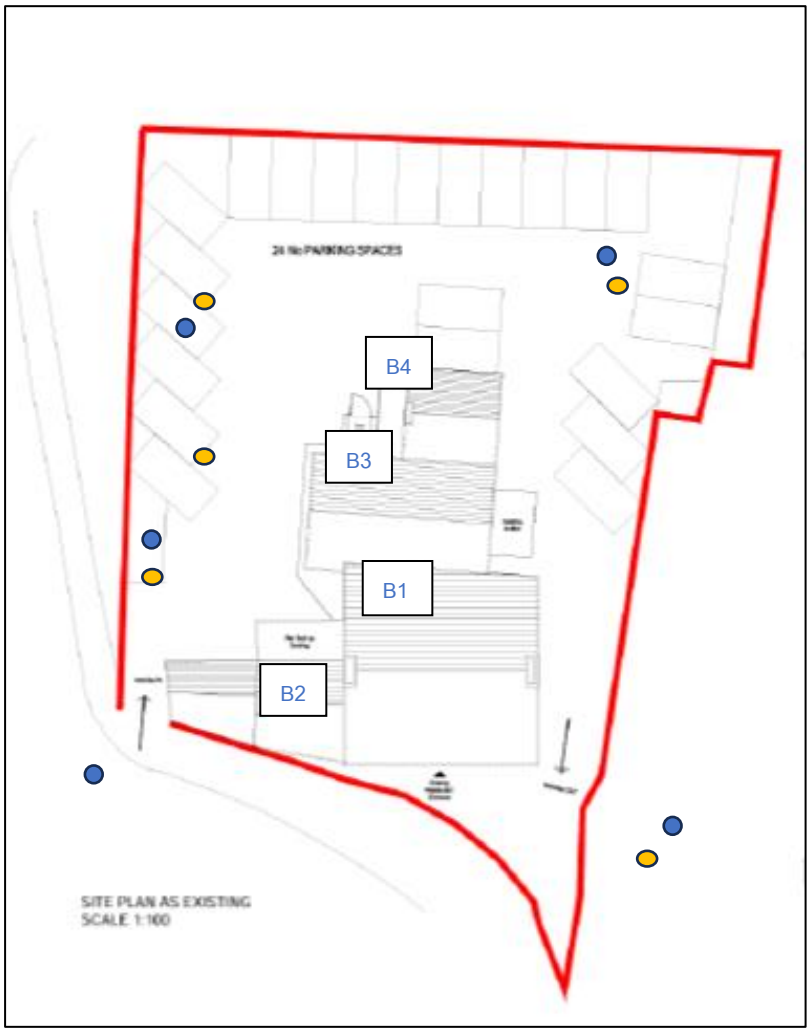

Plate 1: Building numbers (plan courtesy of Acumen Architects and Designers). Surveyor locations are indicated by blue dots, the amber dot shows the NVA locations.

2.1.3 Weather conditions at the time of survey were >10^{0}C with no rain and light winds. Foraging bats were recorded on all of the survey visits confirming that the weather conditions were favourable. Weather conditions and start/end times for the three emergence surveys are provided in Table 1, below.

Table 1 *Survey Details*

Visit (date)	Start	End	Weather
V1 (7th and 11th May 2026)	20.31/20.41	22.30/22.40	11C, dry, calm
V2 (2nd June 2026)	20.45	22.48	13C, dry, light air
V3 (22nd June 2026)	21.10	23.10	20C, dry, calm

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]

2.3 Limitations

2.3.1 There were no limitations to the emergence surveys. 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.

[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.

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. Bats were recorded seemingly emerging from off-site roosts as well as from roosts within the site

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 Emergence Survey

Survey summary

3.2.1 During V1 two Common Pipistrelles *Pipistrellus pipistrellus* were seen to emerge from the buildings, one from B1 and another from between B3 and B4. Up to five Common Pipistrelle bats were recorded intermittently foraging to the rear (North) of the buildings and along the Magdale Lane corridor to the east. Two Soprano Pipistrelles *Pipistrellus pygmaeus* were also recorded briefly foraging along the Magdale lane. An unseen Noctule *Nyctalus noctula* was also recorded, suspected to have been commuting overhead.

3.2.2 Visit 2 recorded a Common Pipistrelle emerged from the eaves at the northern elevation of B2, from beneath a timber fascia board. Up to four Common Pipistrelle bats were recorded foraging around the site especially to the rear (north) of the building and occasionally commuting off site to the north, along

Magdale Lane and over the main road to the south. A single Myotis *Myotis* sp. bat was recorded passing through the site at 22.46.

3.2.3 During Visit 3 no bats were recorded emerging from the buildings. Low levels of foraging activity were observed with up to three Common Pipistrelles making repeated passes with 'feeding buzz' echolocation noted this activity continued intermittently for the duration of the survey. A single Myotis bat was recorded briefly passing at 23.05.

3.2.4 Key foraging and commuting routes are highlighted in Plate 2 below:

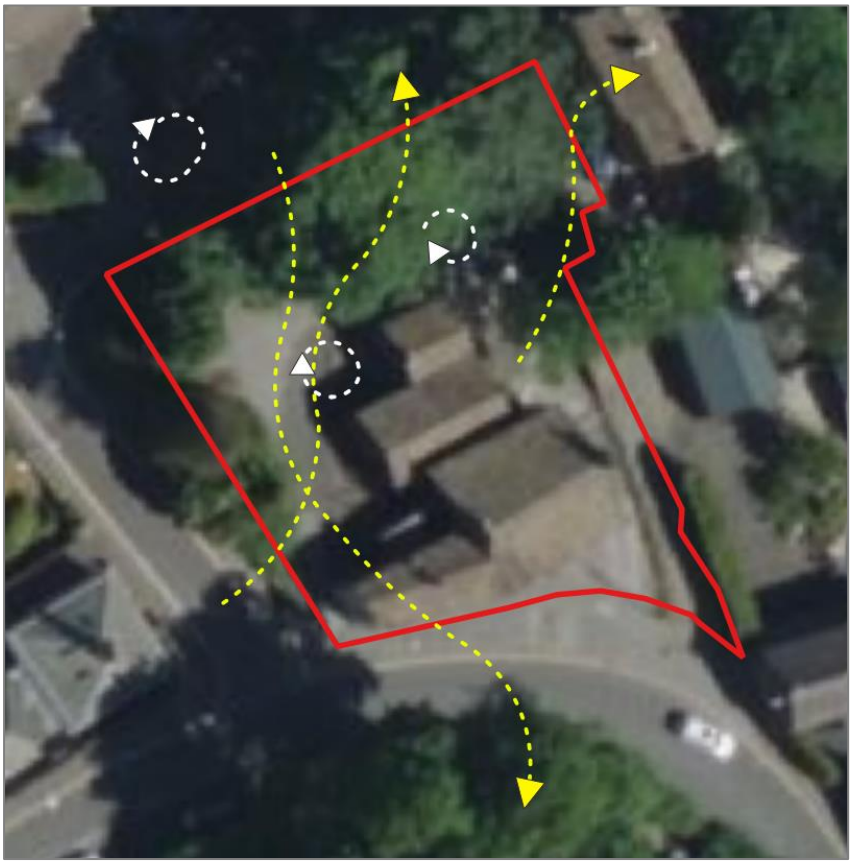

Plate 2. Main foraging activity in white, commuting routes in yellow,

Roost Locations

3.2.5 The locations of all identified roosts are shown in Plate 3 below.

Building 1 (B1)

3.2.6 During the previous MEWP inspection surveys a small number of Pipistrelle sized droppings were located within a masonry gap at the base of the eastern chimney stack.

3.2.7 During the emergence surveys a single Common Pipistrelle *Pipistrellus pipistrellus* was seen to emerge on V1 at 21.31hrs from the base of the opposite stack at the western end of the building, along the northern roof elevation.

Building 2 (B2)

3.2.8 During the inspection surveys 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. A single Common Pipistrelle was recorded emerging from this roost location during Visit 2.

Building 3 (B3)

3.2.9 During the inspection survey c.20 bat droppings were recorded between overlapping roof tiles along the western gable eaves. No bats were recorded emerging from this location however a single Common Pipistrelle emerged during V1 from the 'valley' between B3 and B4 at 21.57hrs.

Building 4 (B4)

3.2.10 Previously 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. No bats were seen to emerge from this or other features during the emergence surveys.

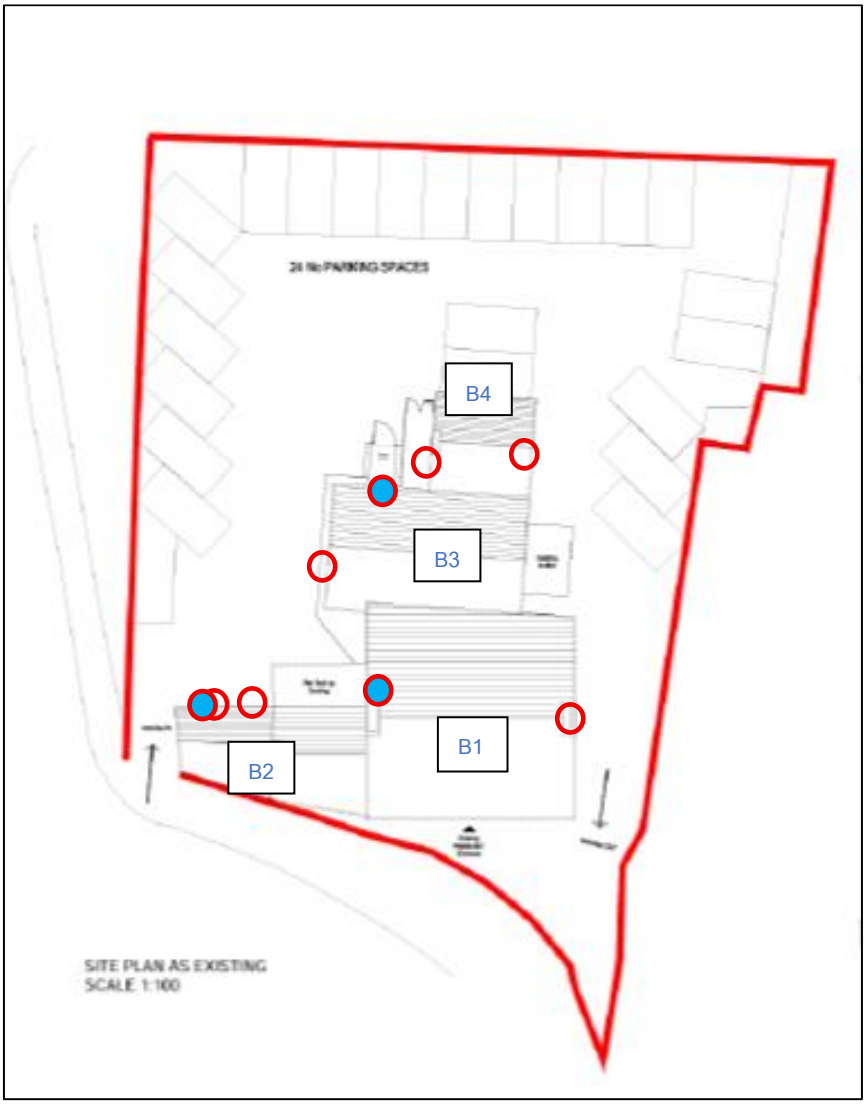

Plate 3: Roost locations (red circles from inspections and blue filled circles from emergence surveys).

4. Assessment

4.1 Interpretation of Results

4.1.1 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.

4.1.2 The emergence surveys confirm that the identified roost locations are used by Common Pipistrelle. Other species recorded during the surveys were limited to low numbers of Soprano Pipistrelle, observed foraging along the adjacent tree lines and to the rear of the buildings. The very low number of passes of Myotis bats and Noctule are not considered to be of bats roosting on site, given that the Noctules were recorded commuting high overhead and the Myotis passes were very brief and were well beyond the usual emergence time for Myotis.

4.1.3 The recorded roosts are classified as low-status day roosts and are likely to be used by male or non-breeding female bats. No higher-status roost, including a maternity roost, is present.

4.2 Assessment of Impacts

4.2.1 The proposals will involve re-roofing and internal refurbishment of B1 and B2 these buildings are linked and are constitute a single roosting opportunity. B3 and B4 are to be demolished and replaced with a new residential dwelling. Collectively, the development proposals will unavoidably result in the loss of the identified low status roost locations which are occupied by Common Pipistrelles.

4.3 Mitigation and Licensing

Licensing

4.3.1 Given the anticipated loss of roosts, a mitigation licence will be required, prior to the commencement of any works likely to disturb, damage or obstruct the roost locations. All roofing works and works to the upper external wall surfaces should therefore be timed to occur only after the licence has been confirmed by Natural England. The licence will be acquired via the Bat Mitigation Class Licence (BMCL) process. No timing restrictions to the works are considered necessary given the low status of the roosts, however the following mitigation will be included as part of the licence requirements:

- 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).

Replacement Roost Provision

4.3.2 Roost compensation will include the installation of a single bat box for each building (three in total) with a further single box provided as an enhancement measure. The four boxes will be an internally located design where only the access slot is visible, such as the 'Verona' woodstone, built-in bat box or similar. The boxes will ideally be mounted on a southeast or southwest facing wall, at least 3m above ground level. The immediate vicinity of the boxes shall not be subject to directed lighting, and the exact location should be advised by a suitably qualified ecologist. The provision of the bat boxes will also enable the discharge of planning condition 5.

Lighting Statement

4.3.3 Lighting will be designed such that the eaves and roof levels above will not be subject to direct lighting. This will ensure that the potential roost location remain viable, following the completion of the development. In addition the dark corridor along Magdale Lane, to the east of the site will remain unlit. It is recommended that the lighting design is reviewed by a suitably qualified ecologist and a Technical Note supplied to ensure that the proposals are in line with the advice note: Bat Conservation Trust and Institute of Lighting Professionals (2023) *Bats and Artificial Lighting at Night*. In this regard the lighting installations will need to be:

- Use shielded, directional luminaires to control spill and glare;
- Keep lighting columns and fittings in positions that do not project light into retained bat habitat;
- Use the lowest light levels necessary;
- Use warmer spectrum lighting and avoid unnecessarily harsh blue-rich light where bats may be affected; and
- Use dimming, timers, motion controls, and part-night lighting where appropriate.

5. Conclusion

5.1.1 The emergence surveys confirm the presence of three low-status day roosts used by low numbers of Common Pipistrelle *Pipistrellus pipistrellus* within the buildings at the site. No evidence of a maternity roost or any other higher-status roost was recorded. The proposed works will result in the loss of these roost features and will therefore require a mitigation licence prior to works commencing. Subject to the implementation of appropriate mitigation, including supervised roof works, provision of replacement roosting habitat and a sensitive lighting design that avoids impacts to retained bat habitat and the River Holme corridor, the development is compliant with relevant legislation and planning policy.

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.