

St Andrews Church, Keighley

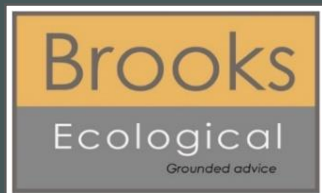


Bat Emergence Survey Report

The Green Neighbourhood Foundation

14/10/2024

ER-7885-02



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Summary Statement

Survey has confirmed the presence of roosting bats within the St Andrews Church building in Keighley.

Current survey information is considered sufficient for planning purposes, but further survey will be required to inform a license application which would be required ahead of any works.

Introduction

- 1. Subsequent to recommendations set out in Brooks Ecological’s Preliminary Ecological Appraisal Report ER-7885-01 in September 2024. Brooks Ecological was commissioned to carry out an updating Bat Emergence Survey at the proposed development Site at St Andrews Church, Keighley.
- 2. Survey was required at the parish church which was assessed as providing features with low bat roost suitability. In accordance with current best practice guidelines, buildings of low suitability need a single evening emergence survey in order to confirm the status of roosting bats.

Figure 1 The surveyed building with red line boundary



Method

- 3. Brooks Ecological specialises in bat surveys ranging from individual buildings through to complex sites requiring numerous visits with large teams. In terms of the survey effort, number of personnel and number of visits required to be able to properly evaluate the building(s) use by bats, we refer to the Bat Conservation Trust Survey Good Practice Guidelines (2023). However, these guidelines are not prescriptive, and we approach each site individually as required using our professional judgement and significant experience base.
- 4. In this case, a single visit with a team of six surveyors was deemed necessary to fully evaluate the potential use of the Site for roosting.
- 5. Surveys were carried out with surveyors positioned around the building to cover all aspects where bats could potentially emerge or return, and to establish activity levels around the Site.
- 6. The surveyors, using heterodyne detectors and an automated Echo Meter Touch 2 were in place at least 15 minutes before sunset and left once all species of bat would be expected to have left a roost and patterns of activity within the Site had been appraised. Conditions and dates are summarised in Table 1 below.

Table 1 Survey conditions.

Date	Survey Type	Temp. Start/End	Weather
28.08.2024	Emergence	17/17°C	Light rain. 80% humidity. 100% cloud cover. Calm, no wind (B0)

- 7. Survey directed by Rob Weston BSc MSc MCIEEM. Rob is an experienced bat surveyor and is licenced to carry out surveys under Natural England’s Survey Level 2 Class License (2015-10607-CLS-CLS) and to Register Sites under the Bats Mitigation Class License CL021 (RC-065).
- 8.

Box 1 *Bat roosts*

Bats roost in buildings and trees in different locations depending upon time of year and environmental factors such as position of the sun, proximity to heat sources and feeding grounds. The following types are commonly referred to:

Transitional roosts

Bats frequently gather early in the season (March to April) before dispersing to summer roosts. Bats can be found in high numbers in these roosts for a very short period. Transitional roosts can also be found shortly before hibernation in August to October when bats (depending upon species) can gather in roosts not used earlier in the season.

Maternity roosts

These are among the most important roosts and are normally occupied from May to August. Depending on the species involved, some maternity roosts can contain a very significant proportion of the local population.

Summer (non-breeding) roosts

Small groups of non-breeding female and male bats can gather in these roosts or bats from a local population may choose to roost individually. There are normally a large number of suitable locations for summer non-breeding roosts and these may be routinely used or used only on an occasional basis. Irregularly used summer roosts can be very hard to find without unreasonable survey effort.

Mating roosts

Around September bats will gather in roost to mate; these are often in different locations than summer or breeding roosts.

Hibernation roosts

As bats in hibernation roosts are highly vulnerable to disturbance and bats can be present in large numbers these are considered to be among the most important bat roosts. Many species of bats roost in large and nationally important hibernation roosts associated with underground sites, many of which are well known and protected. However, the most common bat in the UK (the common pipistrelle) is largely unaccounted for in winter but thought to disperse and roost individually or in small groups in thermally stable cracks and crevices in thick walls or trees.

Box 2 *Legal background*

Bats are afforded full protection under The Wildlife and Countryside Act (1981) plus amendments, and the Conservation of Habitats and Species Regulations 2010. Under these Acts it is an offence among others, to recklessly kill, injure or disturb bats. It is also an offence to destroy or obstruct a roost even if bats are not in occupancy at the time of the action.

There are no defences against contravention of the Habitats Regulations 2010 which means that it is important for detailed and well-designed bat surveys to be carried out, prior to carrying out activities that may impact upon bat roosts such as demolition of buildings or removal of trees.

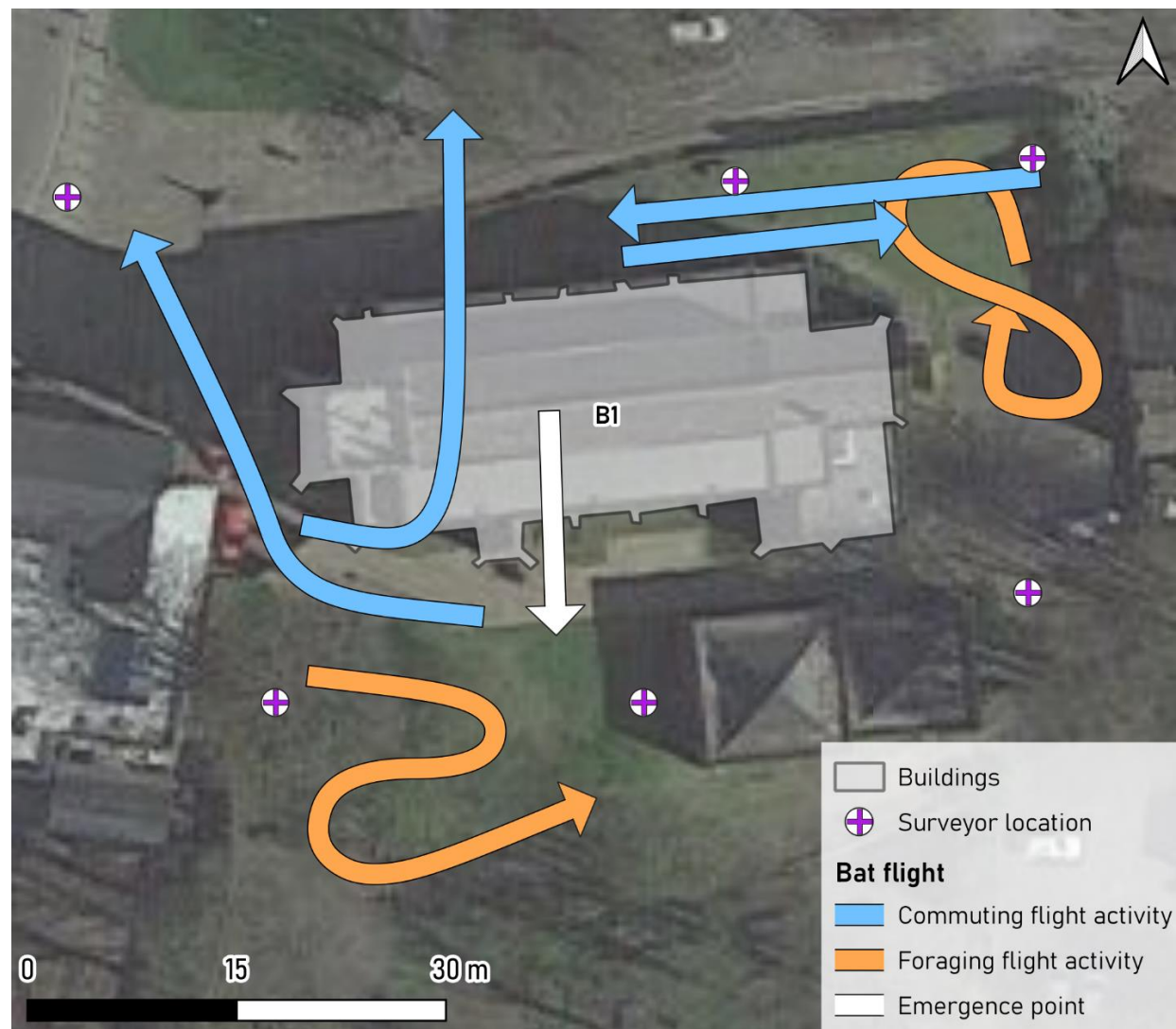
Where bats are found within a potential development site, a license from Natural England may need to be secured if works that could otherwise contravene legislation are to be carried out. These licences are only issued where Natural England is satisfied that works are unavoidable and would not have a negative impact on the favourable conservation status of bats. A Natural England license requires that the potential development site has full planning permission and that bats were a material consideration of the planning permission.

Survey Results

Emergence - 28th August 2024 (sunset 20:07)

9. Surveyors were positioned so as to cover all features with bat roost suitability.
10. Overall, bat activity was considered to be low, with contacts being made by solitary bats.
11. The first contact was logged at 20:24 when a solitary common pipistrelle was observed emerging from the southern facing pitch of the main roof of B1.
12. Solitary common pipistrelles were observed commuting south to north to the west of the building, intermittently throughout the survey.
13. Intermittent foraging was observed by solitary common pipistrelle to the south of the building between 20:38 and 21:02
14. To the north and east of the building frequent foraging and commuting was observed from 20:34 to the end of the survey.
15. No other roosts were identified, or suspected, within the surveyed building.

Figure 2 Summary of bat activity observed during emergence survey.



Evaluation & Conclusion

16. A single evening emergence survey in the peak season has confirmed the presence of a single small day roost, occupied by a single common pipistrelle bat, which is located in the roof of the main church building (B1), see figure opposite. Roost features which could be used include lifted or slipped tiles, and missing mortar below ridge tiles – accessing space between the roof tiles and their lining, or crevices below.
17. The presence of larger roosts elsewhere on Site is not suspected. Current survey information is therefore considered sufficient for planning purposes.
18. Survey has shown that the roost is used by low numbers of common species of bat and, although legally protected, the roost would be assessed by Natural England as being of 'low conservation significance'.
19. Although the location of the roost is known, works affecting any part of the main roof of the church (red shading on adjacent plan) should not be undertaken until further survey can be completed, which is required to pinpoint the exact feature used for roosting. Works to the lower roofs and tower can proceed without the risk of disturbing or destroying bat roosts.
20. Proposals may include works affecting the roof to facilitate renovation. This, or any other works with the potential to disturb the area of roof highlighted in Figure 3, opposite, will require a licence from Natural England to be in place to derogate offences arising through damage or destruction of the roost, or disturbance of roosting bats. This may be a Bat Mitigation Class License (BMCL), or European Protected Species Mitigation License (EPSML). If a Natural England licence is required, conditions to be met for this are discussed below.

Standard Precaution

21. Although no evidence of other roosts has been found, it must be noted that bats frequently move between roost sites, can be very casual in their choice of roosting location, and can turn up unexpectedly at any time.
22. On this basis the developer should always be mindful of bats as a potential constraint and have a protocol in place should any bats be seen or suspected during works: works should stop, a suitably licenced ecologist consulted, and their advice followed.

Enhancement

23. The NPPF puts emphasis on development delivering biodiversity enhancement above and beyond mitigating or compensating for any impacts. To this end the new development could include bat roost features to offer suitable habitat in the long term.

Figure 3 & 4 Location of the identified roost & roost features



Natural England Licence

24. In proceeding to use, or apply for use of either license, it will be important that certain conditions are met. These are discussed below in relation to the application site:

Has sufficient survey been carried out – is sufficient information known about the roost and its use?

25. Not yet – a single presence/ absence survey has been undertaken during the peak season by a team of experienced and licensed surveyors using suitable teams of assistants and equipment. This is considered sufficient to inform a planning application, but not a natural England Licence.
26. The exact location of the roost has yet to be determined. However, activity across the rest of the Site was low and larger roosts are not suspected. In line with Natural England guidance, one further survey is recommended to collect sufficient information about the roost for licensing. Should the BMCL route be taken, additional survey may be required.

Has detailed planning permission been granted for the site and have all conditions relating to wildlife been discharged?

27. No, planning permission is currently being sought.
28. It will be important to review any wildlife-based conditions at the earliest opportunity, as a licence can only be applied for once full planning permission has been secured, and all pre-commencement planning conditions relating to ecology have been discharged.

Can the project satisfy the three licensing tests as outlined in The Conservation of Habitats and Species Regulations 2010?

(i) FCS Test (Regulation 53(9)(b) – Can the favourable conservation status of bats be protected?

29. Yes – the roost appears to be of low conservation significance, and its loss will not impact significantly on bat populations.

(ii) Purpose Test (Regulation 53(2)(e) – Is the purpose of the proposed activity one which is licensable and demonstrable?

30. Yes – the project would be able to apply under the purpose of 'Imperative Reasons of Over-riding Public Interest' (IROPI), meaning that proof of its economic and social imperative would be required.

31. In presenting the application, the ecologist would need to be provided with access to the project's planning consultant and relevant documents.

(iii) The No Satisfactory Alternative Test (Regulation 53(9)(a) – Have alternatives to the proposed activity been considered and ruled out?

32. Yes – Proposals could not proceed without impacting the roof of the church.

33. You would however need to present information which showed that alternatives in terms of the use of the Site, the layout, and timing of works had been considered and the design arrived at represents the least disturbing/affecting possible.

Mitigation

34. Natural England will not require specific mitigation for the licensed (BMCL) loss of this roost. However, replacement roost features are always recommended so as to comply with the NPPF.
35. Mitigation could include integral bat boxes being incorporated into the new build. An interim bat box will also be required, which would be placed in trees or on buildings around the edge of the Site allowing the introduction of new roosts at an early stage of development and prior to the loss of the identified roost.

36. In terms of any works to the roof of the main church, the following method should be agreed under license, but should not be the subject of any condition of planning.

- Prior to any works commencing at the Site, the ecologist will conduct a Site meeting and toolbox talk with contractors. This will make clear the licensed method and the principle that should any additional roosts be encountered during refurbishment, that works will stop immediately whilst the ecologist's advice is sought.
- The roost section of roof should be retained as the last section to be worked upon, with any other works taking place prior. This will encourage any bats present to move away of their own accord and avoid the chance of them relocating to other crevices in other buildings on-Site.
- The interim box will be installed prior to any works affecting the roost feature.
- Once, and only once, a licence is in place will any works to the identified roost commence.
- As the first stage of these works, safe access will be provided to the roost features to allow their detailed inspection. The ecologist will confirm the absence of bats or effect the removal of an appropriate number of bats to the interim bat box mounted on a nearby tree or building.
- Once the ecologist has confirmed in writing that bats are absent, refurbishment of the roost building can be completed.
- Permanent roost features will then be installed to the , and its correct installation confirmed by the named Ecologist.

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