



Urban Tree Experts

BS5837 – Tree Surveys – Ecological Consulting

PRELIMINARY ECOLOGICAL APPRAISAL (DBW) AT MILVERTON 38 NEW ROAD TWYFORD



**Prepared for:
Mrs K Frankham
Milverton
38 New Road
Twyford
RG10 9PT**

27 June 2025

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Bramley House
Newnham Bridge
Tenbury Wells
Worcestershire
WR15 8NX
Tel: 0118 976 2902
Email: info@batsurveys-uk.com

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This report is valid for 12 months from the site inspection. The lifespan of this report may be subject to change if the site conditions change due to unspecified works that affect the site.



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Executive Summary

Urban Tree Experts was commissioned by Mrs K Frankham to conduct a preliminary ecological appraisal (daytime bat walkover [DBW]) of Milverton, 38 New Road, Twyford, RG10 9PT. This is to support a forthcoming planning application to Wokingham Borough Council.

The site visit was carried out on Tuesday 10 June 2025 at 10am, during daylight hours. An internal and external inspection of the property and detached garage took place to look for signs of bats.

The DBW consists of a desk top study prior to the survey to review existing information about the site and its surroundings and to inform the design of subsequent bat surveys, if required. The desk top study was conducted based upon a minimum 2km search radius and it revealed that no statutory designated sites are located within, and one current European Protected Species Licences (EPSLs) for bats has been granted within 2km of the proposed development site. The landform to the east of the site provides suitable habitat for roosting, commuting and foraging bats with tree and hedge lined agricultural fields which provide rich and diverse habitats suitable for a wide range of bat species.

The DBW comprised a detailed search of the interior and exterior of the property and detached garage for bats, signs of bats and features suitable for use by roosting bats. This includes droppings, scratch marks, rubbing and staining at exit holes, live or dead bats and other features such as missing tiles, this list is not exhaustive.

The properties and detached garage suitability to support roosting bats were assessed and potential roost features identified on the property during the preliminary inspection. The property is in a fair condition internally and externally and there are missing and moved tiles, a section of raised lead flashing and missing mortar from the front verge which could provide potential roosting opportunities for bats, and the presence or absence of bats could not be determined. In line with best practice guidelines, the property was assessed as having low potential¹ to support roosting bats.

In line with best practice guidelines², one separate dusk emergence survey is required on the property in order to establish the presence or absence of roosting bats. If bats are recorded emerging from the building during the survey, two further activity surveys and an EPSL will be required in order for the development to proceed legally.

No roosting features were identified on the detached garage and no further survey effort is required on this building.

¹ Table 4.1 Guidelines for assessing the potential suitability of proposed development sites for bats. Bat Surveys for Professional Ecologists Good Practice Guidelines 4th Edition.

² Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists Good Practice Guidelines (4th Edition).



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1. Introduction

1.1 Instruction

Urban Tree Experts was instructed by Mrs K Frankham to conduct a DBW of Milverton, 38 New Road, Twyford, RG10 9PT. This is to support a forthcoming planning application to Wokingham Borough Council.

1.2 Aims and Objectives

The DBW is designed to:

- Identify the presence/likely absence of bats within the buildings.
- Provide information on previous bat ecological surveys/reports.
- Provide information on the status of bats using the buildings currently or previously.
- To add confidence where no bats are found, or to categorise the nature of a roost where evidence of bats are found.
- To establish whether further surveys, mitigation or an EPSL is required.

The DBW and report writing were carried out in accordance with Bat Surveys for Professional Ecologists Good Practice Guidelines 4th edition.

1.3 Proposed Works

The survey was commissioned in connection with a forthcoming planning application to Wokingham Borough Council that will seek to construct a replacement property and double garage following the demolition of the current property and garage on site.

1.4 Surveyor Background and Experience

The preliminary ecological appraisal for bats was completed by Nick Powell and the report was written by Simon Holmes MSc CEnv.

Nick Powell. Nick commenced surveying bats in 2022 and holds a Class 2 Bat License (CLS-11742) and has received training in bat ecology and surveying, bat detector use, acoustic monitoring/sonogram analysis, architectural terms for bat workers, bats and development, H & S awareness for bat workers, legislation for bat workers, British bats their ecology and conservation, surveying trees for bats, Bat ID and handling, bat biology.

Simon holds Class 3 (CL19) and 4 Bat (CL20) Licenses (Nos. 17637 and 17638) and a Science and Education license (SCI64844). He has 35 years' experience of carrying out bat surveys and bat conservation work.

2. Legislation and Planning Policy

2.1 Legislative Background

All species of British bat are protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, as amended. Under this legislation it is an offence to kill or injure a bat or interfere with any roosting or resting site. A bat roost is interpreted as “*any structure or place used for shelter or protection*” whether or not bats are present at the time. A summary of the main legislation and planning considerations are included at Appendix 2.



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Seven species of bat are also Species of Principal Importance for nature conservation in England under Section 41 of the Natural Environment and Rural Communities Act 2006. This places a duty on all government departments to have regard for the conservation of these species and on the Secretary of State to further, or promote others to further, the conservation of these species.

3. Site Location and Description

3.1 Site Location

The building is located at Grid Reference SU78857709, see Figure 1 below. An overview of the immediate area is shown on Figure 2, courtesy of Bing Maps.

Figure 1. Milverton, 38 New Road, Twyford, highlighted.

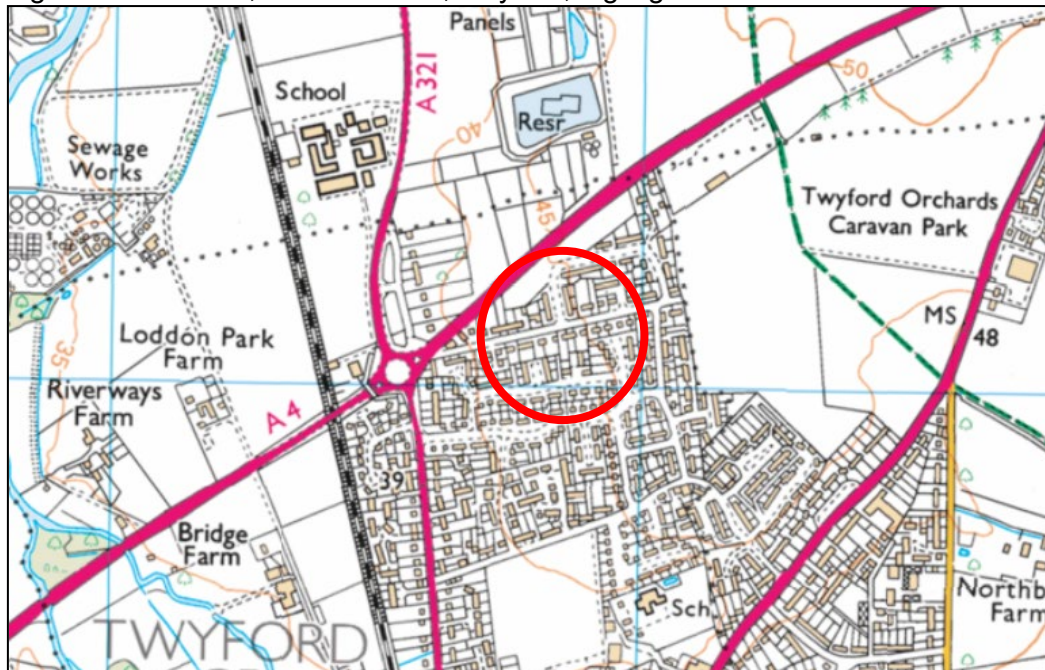
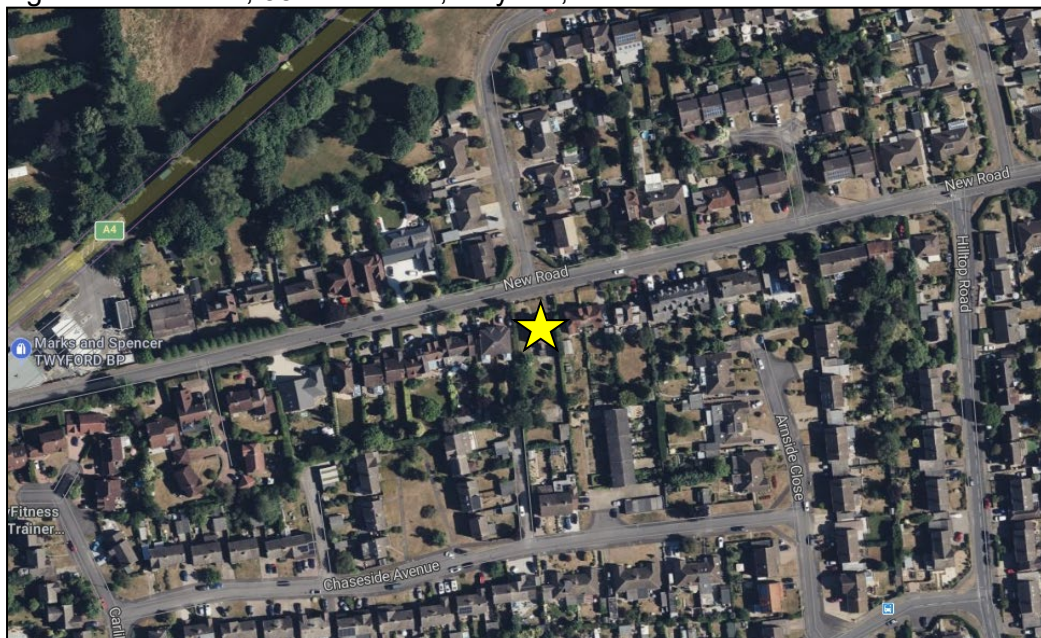


Figure 2. Milverton, 38 New Road, Twyford, overview of the immediate area.





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3.2 Site Description

The application site comprises a detached two-storey, brick-built property with detached garage. The remainder of the site comprises a front lawn surrounded by shrubs, a driveway/parking area and a rear garden, that is mainly laid to lawn with some mature trees, hedgerow and shrubs, see Figure 3 below. The site itself offers some foraging and commuting habitat for bats and, via the garden network, there is ecological connectivity to the wider landscape that provides good habitat for foraging and roosting bats.

Figure 3. Rear garden. Milverton, 38 New Road, Twyford. 10.06.25



4. Survey Methodology

4.1 Pre-Survey Data Search

Google Earth and MAGIC maps (magic.defra.gov.uk) websites were used prior to the survey to determine the suitability of the surrounding habitat to support roosting bats and to identify any statutory designated sites or EPSLs within 2km of the site. Due to the scale of the proposed development, and the very local impact that may occur, no data was sought from the local records centre at this time.

The property is situated on the northern edge of the village of Twyford and is surrounded by properties and gardens of differing sizes and styles. To the north and east, and connected via the garden network, lie tree and hedge lined agricultural fields which are likely to provide good habitat for bats and are within travelling distance for bats. Further afield to the west is the Loddon River which feeds down into Charvil Country Park which is known to support roosting, foraging and commuting habitat for bats however there is limited connectivity to the site due to the intervening built environment.



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No statutory designated sites lie within 2km of the proposed development site. A search of the Magic interactive website revealed that one current EPSL for bats has been granted within 2km of the site, the details of which are provided in Table 1 below.

Table 1. Current EPSLs for bats within 2km of the site

EPSL reference	Licence end date	Species on licence
2020-49294-EPSP-MIT	08/2025	Common and soprano pipistrelle

4.2 Daylight Survey

The DBW of Milverton, 38 New Road, Twyford, RG10 9PT was carried out by Nick Powell on Tuesday 10 June 2025 at 10am. The weather conditions for the survey were dry and bright with a temperature of 19.5 degrees. Equipment used included a high-powered torch, a digital camera on a telescopic pole and a ladder.

During the DBW an external and internal inspection of the property and detached garage was carried out to identify any signs of occupation by bats and features that could offer potential roosting sites following standard survey guidelines. Features investigated included:

- Construction of the buildings – soffits, loft space, tiles/slates, lead flashings etc.
- Building condition – structure of roof and walls.
- Internal conditions – microclimate stability, draughts etc.
- Access points – potential entry and exit points for bats.
- Roosting points – cracks and crevices, between underlay and roofing tiles/slates.

Field signs that would indicate the presence of bats were searched for. These included:

- Bat droppings on the floor and walls of the buildings.
- Feeding remains (particularly butterfly and moth wings).
- Evidence of urine and/or oily staining around possible roost entrances.
- Presence of areas cleared of cobwebs.
- Where a breathable roofing membrane has been fitted staining on the membrane may suggest use by bats.
- Odour can sometimes suggest the present of bats.
- Squeaking and chattering can reveal bats roosting between the tiles and roofing underlay.

Buildings or structures that were not to be affected by the current proposals or with no bat roosting potential were not inspected.

4.3 Constraints

Access to the site during the visit was made possible by the client. A thorough inspection of the loft space could not be conducted due to the lack of boarding and thick insulation/lack of any visible rafters.



5. Survey Findings

5.1 External Inspection

The external features of the property and detached garage were examined for signs described in section 4.2. Windowsills, exposed features around the windows, fascias and walls were inspected for any evidence of bat droppings or staining.

The property is a detached, brick-built two-story building with rear flat roof extension, see Figure 4 below. The double pitched roof (see Figure 4 below) is covered in clay tiles, some of which are broken and/or missing, see Figure 5 on page 9. The ridge tiles are firmly attached with no gaps that crevice dwelling bat species could exploit, see Figure 6 on page 9. There are missing/lifted tiles on the bay window on the eastern elevation and lifted lead flashing, there are also missing/lifted tiles on the porch roof on the western elevation and on the rear, single storey pitched roof, see examples at Figure 7 on page 10. The majority of the verges are well sealed with no missing mortar, however on the front verge all the mortar has gone, see Figure 8 on page 11. The soffits and fascias and eaves are tight to the wall with no gaps that could be exploited by crevice dwelling bat species, see Figure 9 on page 11. At the rear of the property is an extension (see Figure 10 on page 12), the flat roof of which is covered in well fitted bitumen felt with no rips or tears, see Figure 11 on page 12.

At the bottom of the garden is the detached, brick build garage, see Figure 12 on page 13. The flat roof is covered in corrugated asbestos sheets, none of which are broken or slipped, see Figure 13 on page 13.

No bats or evidence of bats were recorded during the external inspection of the property or detached garage although there are various features on the property that provide potential crevice roosting opportunities for bats.

Figure 4. Rear view of double pitched section of the property. Milverton, 38 New Road, Twyford. 10.06.25





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Figure 5. Example broken/missing roof tiles. Milverton, 38 New Road, Twyford.
10.06.25



Figure 6. Example sealed ridge tiles. Milverton, 38 New Road, Twyford. 10.06.25





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Figure 7. Example missing tiles and lifted lead flashing on bay window on eastern elevation. Missing tiles on the porch on western elevation and lifted tiles on rear, single storey pitched roof section. Milverton, 38 New Road, Twyford. 10.06.25





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Figure 8. Example missing mortar from front verge. Milverton, 38 New Road, Twyford. 10.06.25



Figure 9. Example sealed eaves/soffits/fascias on property. Milverton, 38 New Road, Twyford. 10.06.25





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Figure 10. Rear extension. Milverton, 38 New Road, Twyford. 10.06.25



Figure 11. Well-sealed bitumen felt on rear extension. Milverton, 38 New Road, Twyford. 10.06.25





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Figure 12. Detached garage. Milverton, 38 New Road, Twyford. 10.06.25



Figure 13. Roof of garage. Milverton, 38 New Road, Twyford. 10.06.25





5.2 Internal Inspection

An internal inspection of the property and detached garage was undertaken and were examined for any signs of bats (as described in section 4.2).

The loft space was accessed via a ladder and is in a fair condition. The loft space is lit via a window, not boarded and deeply insulated (see Figure 14 below), and due to the lack of boarding and no visible rafters a thorough inspection could not be conducted. Internally the loft is lined with timber sarking, all of which that could be seen appeared to be in a good condition, see Figure 14 below. There is no loft space in the rear, single storey extension, the tiles having been lined with foam boards, see Figure 15 on page 15.

There is no loft space in the garage, the asbestos panels being visible inside and, due to the construction material and light ingress from the large, rear window, the building does not offer any roosting potential, see Figure 16 on page 15.

No bats or evidence of bats was recorded during the internal inspection of the property or garage and internally there appeared to be no roosting opportunities for bats within these spaces.

Figure 14. Example loft space and timber sarking. Milverton, 38 New Road, Twyford. 10.06.25





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Figure 15. Internal view of rear, single storey extension. Milverton, 38 New Road, Twyford. 10.06.25



Figure 16. Internal view of garage roof. Milverton, 38 New Road, Twyford. 10.06.25





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6. Evaluation

The bat roost potential of the features within the site have been assessed with reference to the following criteria and include seasonal variation where increased or decreased probability may arise. Where features are present, they are **highlighted in bold**.

The likelihood of bat roosts being present will be higher where structures:

- are of a pre-20th Century construction;
- are in a lowland rural setting;
- **have woodland, mature trees, species-rich grassland and/or water nearby;**
- have large dimension roof timbers with cracks, joints and holes;
- have numerous crevices in stonework and structures;
- **have an uneven roof covering with gaps, though not too draughty;**
- have hanging tiles or roof cladding, especially on south-facing walls;
- **have a roof warmed by the sun;**
- are disused or little used; largely undisturbed;
- provide appropriate hibernation conditions, such as abandoned mines, tunnels, kilns, or fortifications; or
- **Recent and historical records of bat roosts in the general area.**

The likelihood of bat roosts being present will be lower where structures:

- **are in an urban setting with little green space;**
- are subject to heavy disturbance (constant movement due to draughts and noise, also unstable microclimate);
- have a small, cluttered roof void (particularly for brown long-eared);
- **are of a modern construction with few gaps or crevices that bats can fly or crawl through (though pipistrelle bats may still be present);**
- are comprised of prefabricated steel or sheet materials; (some sections);
- are active industrial premises.

Please note that the list above provides generic screening criteria only and there are exceptions to consider.

7. Conclusions

7.1 Interpretation

The property and detached garage are in a fair condition internally and externally. The missing and moved tiles, section of raised lead flashing and missing mortar from the front verge on the property provide crevice-like features suitable for bats to roost and we are unable to determine the presence or absence of bats at the property without further survey effort. When the findings are combined with the desk top study the property was assessed as having a low potential to support roosting bats.

Based on the Bat Workers Manual and the Bat Surveys Good Practice Guidelines, one dusk emergence survey need to be undertaken on the property, between May and August, to establish the presence or absence of roosting bats and in order to inform appropriate mitigation for the proposed works if necessary. The features identified will require four survey positions, all equipped with bat detectors and night vision cameras in order to cover the potential bat roosting features. If bats are recorded emerging from the building during the survey, two further activity surveys and an EPSL will be required in order for the development to proceed legally.



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Surveying the main roof of the property will be difficult due to the steep angle of the roof and presence of neighbouring properties therefore we also recommend that a static bat detector be installed in the loft space of the property for a period of two weeks to provide further data to support the survey process.

No roosting features were identified on the detached garage and no further survey effort is required on this building.

7.2 Contingency Plan

If, for whatever reason, there is a time delay of greater than 12 months between this survey and the commencement of work, then the survey should be repeated as the condition of the building may change and the site may become more suitable to support roosting bats.

8. References

Collins, J (ed.) (2023). Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London.

HM Government (2017) Conservation of Habitats and Species Regulations as (amended).

HM Government (1981) The Wildlife and Countryside Act (as amended).

HM Government (2006) Natural Environment and Rural Communities Act.

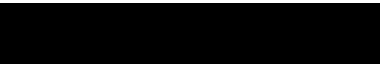
Mitchell-Jones, A.J. & McLeish, A.P. (2004). Bat Workers' Manual (3rd Edition). Joint Nature Conservation Committee.

9. Queries

Any queries regarding this report should be addressed, in the first instance, to Urban Tree Experts:

Telephone: 01189 762902
Email: info@batsurveys-uk.com

Urban Tree Experts
Bramley House
Newnham Bridge
Tenbury Wells
Worcestershire WR15 8NX


Simon Holmes MSc. CEnv.
Consultant, Urban Tree Experts
Natural England Licence CLS-CLS-17637, CLS-CLS-17638



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APPENDIX 1

In summary, the legislation combined makes it an offence to:

- Intentionally or recklessly damage, destroy or obstruct access to a structure or place used for shelter by a bat.
- Intentionally or recklessly disturb bats; in particular any disturbance which is likely to impair the ability of bats to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating bats, to hibernate or migrate.
- Intentionally or deliberately kill, injure or take any bat.

Planning Considerations:

Government guidance to Local Planning Authorities stipulates the need to consider biodiversity and protected species during the consideration of planning applications. The NPPF makes clear that the planning system should help minimise the impacts that development can have on biodiversity and provide net gains in biodiversity where possible. In addition, the ODPM Circular 04/2005 states *“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision”*.

Policy CP7 of the Wokingham Borough Core Strategy (planning policy relating to the site) states *“Development which may harm habitats or, species of principle importance in England for nature conservation, veteran trees or features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors), whether directly or indirectly will be only permitted if it has been clearly demonstrated that the need for the proposal outweighs the need to safeguard the nature conservation importance, that no alternative site that would result in less or no harm is available which will meet the need, and*

- i) Mitigation measures can be put in place to prevent damaging impacts; or*
- ii) Appropriate compensation measures to offset the scale and kind of losses are provided”*.

Developments that compromise the protection afforded to bats or roosts under the provisions of the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981 will require a European Protected Species (EPS) licence from Natural England (NE).

NE, the government’s statutory conservation advisory organisation, is responsible for issuing EPS licences that would permit activities that would otherwise lead to an infringement of the Habitat Regulations.

Three tests must be satisfied before this licence (to permit otherwise prohibited acts) can be issued:

- Reg 44(2)(e) – the derogation is “in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment”.
- Reg 44(3)(a) – there is “no satisfactory alternative” to the derogation.
- Reg 44(3)(b) –the derogation is “not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range”.

Tests (a) and (e) can be met with the issue of planning permission for the proposed works. Test (b) is determined by NE’s ecology department that requires the development of a suitable mitigation strategy that would ensure that any bats present on site, are retained at the same population level or better.