

**Trees at Riverside Park
Woosehill
Wokingham
Berkshire**

Ground Level Tree Assessment

Report ref.: R3115_GLTA_a

<i>Report Quality Control Information</i>	
<i>Author</i>	<i>John Wenman MCIEEM</i>

March 2026



1 Diesel House, Honey Hill, Wokingham, Berkshire RG40 3BL
Telephone: 0118 3271810 Mobile: 07979 403099 E-mail: info@wenman-ecology.co.uk
www.wenman-ecology.co.uk

John Wenman Ecological Consultancy LLP is a limited liability partnership registered in England and Wales with registered number OC339057.
Registered office: 1 Diesel House, Honey Hill, Wokingham, Berkshire RG40 3BL where you may look at a list of members' names.

CONTENTS PAGE

1	EXECUTIVE SUMMARY	3
2	INTRODUCTION	4
2.1	Project Background.....	4
2.2	Site Location and Context.....	4
2.3	Report Objectives	4
3	LEGISLATIVE AND POLICY BACKGROUND	5
3.1	Relevant Legislation.....	5
3.2	Planning Policy	5
3.3	Mitigation Licensing	6
4	SURVEY METHODOLOGY	7
4.1	Desk Study	7
4.2	Ground Level Tree Assessment	7
5	SURVEY RESULTS	10
5.1	Desk Study	10
5.2	Ground Level Tree Assessment	10
6	DISCUSSION	28
6.1	Assessment of Roosting Resource	28
6.2	Impact Assessment.....	28
7	RECOMMENDATIONS	30
7.1	Risk Assess, Monitor and Manage (Avoidance)	30
7.2	Roost Resource Approach for T2 (P, T4 & T29- PRF-I trees).....	30
8	REFERENCES	32

1 EXECUTIVE SUMMARY

- 1.1.1** John Wenman Ecological Consultancy LLP was instructed by the South East Rivers Trust to undertake a Ground Level Tree Assessment for bats (GLTA) of 17 trees at Riverside Park in Woosehill, Wokingham. The GLTA was commissioned in relation to proposed arboricultural works to enable works to enhance the Emm Brook. In preparation for the works, the GLTA will ensure that the operations comply with the Conservation of Habitats and Species Regulations 2017 (as amended) relating to European Protected Species (EPS).
- 1.1.2** The aim of the GLTA is to determine the presence or absence of potential roost features, i.e. roost resource, and establish whether further survey and/or mitigation would be required. A ground level inspection of the trees that require arboricultural works was undertaken on the January 14th 2026 by John Wenman MCIEEM registered under Natural England Bat Survey Class Licence CL18.
- 1.1.3** Three trees (T2, T4 & T29) supported a potential roost feature classified as PRF-I suitability; the other trees were of negligible bat roost potential. In the absence of precautionary measures, the proposed works to the PRF-I trees could lead to the disturbance, injury or death of any roosting bats in occupancy at the time of the operations.
- 1.1.4** The works (coppicing or soft felling) will follow a Precautionary Working Method Statement (PWMS) and a roost resource approach to mitigation and compensation for the arboricultural operations to PRF-I will be appropriate.
- 1.1.5** In the long-term, the removal of trees classified as PRF-I suitability will result in the reduction of the available roosting resource for bats. Bat boxes should be installed on retained trees to compensation for the loss of potential roost resource.
- 1.1.6** This report contains information regarding a mobile species so it will likely be valid for 12 months only (CIEEM 2019b).

2 INTRODUCTION

2.1 Project Background

2.1.1 John Wenman Ecological Consultancy LLP was instructed by the South East Rivers Trust to undertake a Ground Level Tree Assessment for bats (GLTA) of 17 trees at Riverside Park in Woosehill, Wokingham. The GLTA was commissioned in relation to proposed arboricultural works to enable works to enhance the Emm Brook.

2.1.2 In preparation for the works, the GLTA will ensure that the operations comply with the Conservation of Habitats and Species Regulations 2017 relating to European Protected Species (EPS). Twenty nine trees were identified that require arboricultural works.

2.2 Site Location and Context

2.2.1 The trees are situated within Riverside Park in Woosehill, Wokingham in Berkshire (OS grid reference for approximate Park centre: SU799689).

2.2.1 The trees are situated within the Park – a well-used public open space - through which flows the Emm Brook and there is a network of footpaths. The built up residential areas of Woosehill and Wokingham surround the Park.

2.3 Report Objectives

2.3.1 The aim of the GLTA is to determine the presence or absence of potential roost features, i.e. roost resource, and establish whether further survey and/or mitigation would be required.

3 LEGISLATIVE AND POLICY BACKGROUND

3.1 Relevant Legislation

3.1.1 In England and Wales, all bat species found in the wild are fully protected under the Wildlife & Countryside Act 1981 (as amended) (WCA) and Conservation of Habitats and Species Regulations 2017 (as amended); the regulations are commonly referred to as the Habitat Regulations and hereafter referred to as such. The Habitat Regulations refer to European Protected Species (EPS) and all species of bats in the United Kingdom (UK) are EPS. Although the UK left the European Union on the 31st January 2020 and is therefore no longer tied to European legislation, the Habitat Regulations have been retained in their current format.

3.1.2 The legal framework underpinned by the WCA and Habitat Regulations makes these specific actions an offence as follows:

- Deliberately kill, injure, capture or take a wild bat;
- Deliberately, intentionally or recklessly disturb bats; in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, to rear or nurture their young, to hibernate or migrate, or to significantly affect local distribution or abundance;
- Damage or destroy a place used by a bat for breeding or resting; and
- Intentionally or recklessly obstruct access to any place used by a bat for shelter or protection.

3.2 Planning Policy

3.2.1 The biodiversity duty imposed through the Environment Act 2021 states that Local Planning Authorities (LPAs) must consider what action they can take to conserve and enhance biodiversity in England. Government planning policy, such as the ODPM Circular 06/2005, requires LPAs to account for the conservation of protected species when considering and determining planning applications.

3.2.2 The ODPM Circular 06/2005 states that *‘the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat.’* This policy means that in instances where there is a reasonable likelihood of bats being present and affected by a development, surveys must be undertaken to inform a mitigation strategy to be agreed prior to granting planning permission.

3.3 Mitigation Licensing

3.3.1 The government's statutory nature conservation body, Natural England, is responsible for issuing European Protected Species (EPS) mitigation licences that would permit activities that would otherwise lead to an infringement of the Habitat Regulations. An EPS mitigation licence can be issued if the following three tests derived from Regulation 55 have been satisfied:

- (2)(e) – the derogation is for the purposes of *'preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.'*
- (9)(a) – there is *'no satisfactory alternative'* to the derogation; and
- (9)(b) – *'the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.'*

3.3.2 LPAs have a statutory duty under Regulation 7(3)(e) of the Habitat Regulations to consider and determine whether these three tests are likely to be satisfied by planning proposals affecting EPS before granting planning permission. If an EPS mitigation licence is necessary, a licence can be sought once all the necessary planning consents have been granted. Natural England aims to issue a decision on licence applications within 30 working days of submission.

3.3.3 The Bat Mitigation Class Licence (BMCL) scheme allows ecologists to apply to become Registered Consultants to use this licence for low conservation status roosts, i.e. roosts comprising small numbers of seven commonly occurring species. A site registration form must be completed as a condition of the licence and submitted to Natural England at least three weeks before the licensable activities are due to start; Natural England aims to register sites within two weeks of submission.

3.3.4 Baseline survey information supporting EPS mitigation licence applications or BMCL site registrations must be up-to-date and have been completed within the current or most recent optimal season. A suitably experienced ecologist will be required to undertake a site walkover/check within three months prior to application/registration submission to confirm that conditions have not changed since the most recent survey.

4 SURVEY METHODOLOGY

4.1 Desk Study

4.1.1 A desk-based study for bats was undertaken to collate and review existing information about London Road and the surrounding land. The study utilised the following open access resources:

- Google Earth – satellite imagery was used to identify potential flight paths and foraging habitats for bats;
- MAGIC – examined to locate granted European Protected Species licences; and
- Pre-existing bat survey reports – any available reports were obtained from the client to provide background information for the site.

4.2 Ground Level Tree Assessment

Survey Details

4.2.1 A ground level inspection of the 17 trees that require arboricultural works (*as detailed in the Arboricultural Assessment & Method Statement MW.21.0124.AIA; Mark Welby Consulting Arborists Feb 2021*) was undertaken on the 14th January 2026 by John Wenman MCIEEM registered under Natural England Bat Survey Class Licence CL18, in accordance with good practice guidance (Collins 2023). The equipment used during the inspection comprised binoculars and a high-power (1 million candlepower) LED torch. The inspection involved a systematic search around all aspects of each tree for potential roost features (PRFs) during daylight hours.

Types of PRFs

4.2.2 The types of PRFs that can be exploited by bats are derived from Bat Roosts in Trees BTHK (2018) and include:

- PRFs formed by disease and decay such as woodpecker holes, squirrel holes, knot holes, pruning cuts, tear-outs, wounds, cankers, compression forks and butt-rotts;
- PRFs formed by damage such as lightning strikes, hazard beams, subsidence cracks, shearing cracks, transverse snaps, welds, lifting bark, desiccation fissures and frost cracks; and
- PRFs formed by association such as fluting and ivy.

Signs of Bats

4.2.3 The only conclusive evidence of a bat roost in a tree is the presence of actual bats (live or dead) or their droppings. However, it is important to note that bat droppings are less likely to persist in tree roosts compared to roosts in buildings so their absence inside a PRF does not necessarily equate to evidence of bat absence. Other signs of bats inside PRFs include:

- Bat fly puparia (pupal cases);
- Odour (ammonia-type smell);
- Staining below or inside an entrance;
- Smoothing of an entrance; and
- Audible squeaking at dusk or in warm weather.

4.2.4 These signs are not conclusive in isolation or combination because they can be caused by other animals (i.e. birds and squirrels) or as a result of wet rot for staining. However, it should be noted that bat roosts can exist in trees whilst exhibiting no signs externally.

PRF Categorisation

4.2.5 The trees have been assessed for their suitability to possess bat roosts using the categories detailed in **Table 1** below:

Table 1. Categories for suitability of tree for roosting bats (Source: Collins 2023).

Suitability	Description
None	There are no PRFs present in the tree or it is highly unlikely that any PRFs are present.
FAR	Further assessment is required to establish whether PRFs are present in the tree.
PRF	A tree with at least one PRF where further assessment is required to determine the potential suitability of the tree for roosting bats.
PRF-I	A PRF that is only suitable for individual bats or very small numbers of bats either due to its size or the lack of suitable surrounding habitats.
PRF-M	A PRF that is suitable for multiple bats and could therefore be used by a maternity colony.

Survey Limitations and Validity

4.2.6 There were no significant survey limitations because although the GLTA was carried out in January i.e. when trees are not in leaf and it was considered possible to see all PRFs from ground level; dense vegetation restricted full movement around some trees

although this was not considered to be a significant constraint. The GLTA was carried out in dry weather.

- 4.2.7** This report contains information regarding a mobile species so it will likely be valid for less than 12 months (CIEEM 2019b).

5 SURVEY RESULTS

5.1 Desk Study

- 5.1.1** The trees are located within a parkland with high quality foraging and commuting habitat for bats comprising established woodland and the Emm Brook.
- 5.1.2** Bat mitigation licences that have been granted within the last 10 years inside a 2km radius of the site are detailed in **Table 2** below.

Table 2. Bat mitigation licences granted within a 2km radius (Source: MAGIC).

Case Reference of Granted Licence	Species on the Licence	Licensable Period	Licensable Works	Distance from approx. Park centre (m)
2015-11806-EPS-MIT	Bat	Common pipistrelle	Destroy resting place	1000m
2016-22176-EPS-MIT	Bat	Brown long eared bat	Destroy resting place	212m

- 5.1.3** Pre-existing survey work at Riverside Park completed by John Wenman Ecological Consultancy in 2021 recorded three species active on site: common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*) and noctule (*Nyctalus noctula*) on site, with individual common pipistrelle and soprano pipistrelle recorded using tree roosts at that time.

5.2 Ground Level Tree Assessment

Overview

- 5.2.1** The findings from the Ground Level Tree Assessment (GLTA) carried out for the 17 trees that require arboricultural works (*as detailed in the Arboricultural Assessment and Method Statement MW.21.0124.AIA; Mark Welby Consulting Arborists; Feb 2021*) are detailed in **Table 3** with photographs as follows:

Survey Findings

Table 3. GLTA survey findings.

Tree ref.:	2	Species:	Crack Willow		
Age:	Mature	Height (m):	19m		
General comment	Part of group of crack willows; ivy cover on stems. Minor deadwood visible of negligible roost potential.				
Proposed arb works	Coppicing				
Contextual photographs:					
					
T2-			T2 – ivy cover		
PRF ref.:	PRF location:	PRF type:	PRF direction:	PRF height (m):	PRF suitability / signs:
PRF1	Main stem	Ivy cover	Around stem	Length of main stem	PRF-I

Tree ref.:	3	Species:	Crack willow
Age:	Mature	Height (m):	19m
General comment	Mult-stemmed tree with no visible bat roost potential.		
Proposed arb works	Coppicing		
Contextual photographs:			
 T3			
PRF suitability / signs:			
Negligible Bat Roost Potential			

Tree ref.:	4	Species:	Crack willow		
Age:	Mature	Height (m):	19m		
General comment	Ivy cover on main stem				
Proposed arb works	Coppicing				
Contextual photographs:					
					
Tree 4			Tree 4 – ivy cover on stem		
PRF ref.:	PRF location:	PRF type:	PRF direction:	PRF height (m):	PRF suitability / signs:
PRF1	Main stem	Ivy cover	E	c.1-15m	PRF-I

Tree ref.:	5	Species:	Crack willow		
Age:	Mature	Height (m):	19m		
General comment	Single stemmed tree with sparse ivy cover but no visible bat roost features				
Proposed arb works	Coppicing				
Contextual photographs:					
					
T5					
PRF suitability / signs:					
Negligible Bat Roost Potential					

Tree ref.:	10	Species:	Alder
Age:	Mature	Height (m):	16m
General comment	Multi-stemmed tree – some ivy cover but of negligible bat roost potential		
Proposed arb works	Fell		
Contextual photographs:			
			
Tree10			
PRF suitability / signs:			
Negligible Bat Roost Potential			

Tree ref.:	11	Species:	Alder		
Age:	Mature	Height (m):			
General comment	Multi-stemmed tree with high level nesting material. No visible bat roost potential				
Proposed arb works	Fell				
Contextual photographs:					
 Tree 11					
PRF suitability / signs:					
Negligible Bat Roost Potential					

Tree ref.:	Tree 12	Species:	Hawthorn		
Age:	Mature	Height (m):	6m		
General comment	Small, heavily ivy clad tree – negligible bat roost potential				
Proposed arb works	Fell				
Contextual photographs:					
					
Tree 12					
PRF suitability / signs:					
Negligible Bat Roost Potential					

Tree ref.:	13	Species:	Alder		
Age:	Mature	Height (m):	16m		
General comment	Three stemmed tree with some dead ivy but of negligible bat roost potential				
Proposed arb works	Fell				
Contextual photographs:					
 Tree 13					
PRF suitability / signs:					
Negligible Bat Roost Potential					

Tree ref.:	22	Species:	Crack willow
Age:	Semi-mature	Height (m):	5m
General comment	Small multi-stemmed tree growing from collapsed stem. Negligible bat roost potential.		
Proposed arb works	Fell		
Contextual photographs:			
			
Tree 22			
PRF suitability / signs:			
Negligible Bat Roost Potential			

Tree ref.:	29	Species:	Ash		
Age:	Mature	Height (m):	19m		
General comment	Mature tree with ivy growth severed at c. 3-4m high. Remaining ivy growth provides PRF-I				
Proposed arb works	Fell				
Contextual photographs:					
					
Tree 29 with partially severed ivy and gaps between					
PRF ref.:	PRF location:	PRF type:	PRF direction:	PRF height (m):	PRF suitability / signs:
PRF1	Main stem	Ivy cover	NW + SE	5-8m	PRF-I

Tree ref.:	44	Species:	Alder		
Age:	Mature	Height (m):	15m		
General comment	Stream side tree with straight stem and sparse ivy cover				
Proposed arb works	Fell				
Contextual photographs:					
					
Tree 44					
PRF suitability / signs:					
Negligible Bat Roost Potential					

Tree ref.:	46	Species:	White poplar
Age:	Semi-mature	Height (m):	7m
General comment	Mult-stemmed young tree with negligible bat roost potential		
Proposed arb works	Fell		
Contextual photographs:			
			
Tree 46			
PRF suitability / signs:			
Negligible Bat Roost Potential			

Tree ref.:	48	Species:	Alder
Age:	Early mature	Height (m):	10m
General comment	Young tree with superficial wound at c.1m high on stem. Negligible bat roost potential.		
Proposed arb works	Fell		
Contextual photographs:			
			
Tree 48			
PRF suitability / signs:			
Negligible Bat Roost Potential			

Tree ref.:	49	Species:	Hazel
Age:	Early mature	Height (m):	5m
General comment	Coppice stool of negligible bat roost potential		
Proposed arb works	Fell		
Contextual photographs:			
			
Tree 49			
PRF suitability / signs:			
Negligible Bat Roost Potential			

Tree ref.:	50	Species:	Alder		
Age:	Early mature	Height (m):	10m		
General comment	Straight stem with sparse ivy. Bird nesting material. Negligible bat roost potential.				
Proposed arb works	Fell				
Contextual photographs:					
 Tree 50					
PRF suitability / signs:					
Negligible Bat Roost Potential					

Tree ref.:	51	Species:	Ash
Age:	Early mature	Height (m):	10m
General comment	Group of three self stems with sparse ivy cover. Negligible bat roost potential.		
Proposed arb works	Fell		
Contextual photographs:			
 Tree 51			
PRF suitability / signs:			
Negligible Bat Roost Potential			

Tree ref.:	52	Species:	Alder		
Age:	Mature	Height (m):	25m		
General comment	Ivy cover on mature stem but superficial gaps of negligible bat roost potential. No other visible bat roost features.				
Proposed arb works	Fell				
Contextual photographs:					
					
Tree 52					
PRF suitability / signs:					
Negligible Bat Roost Potential					

6 DISCUSSION

6.1 Assessment of Roosting Resource

6.1.1 The site has high-quality habitat for foraging and roosting bats comprising and woodland and the Emm Brook stream. Furthermore, bat mitigation licences granted within the last 10 years identified at least two species inside a 2km radius of the site: brown long-eared (*Plecotus auritus*) and common pipistrelle (*Pipistrellus pipistrellus*)

6.1.2 Trees 2, 4 and 29 had potential roost features summarised as follows:

- **Tree 2** – One PRF (dense ivy cover) that has potential to be used on an occasional basis by individual bats and therefore has potential PRF-I suitability.
- **Tree 4** - One PRF (dense ivy cover) that has potential to be used on an occasional basis by individual bats and therefore has potential PRF-I suitability.
- **Tree 29** - One PRF (dense ivy cover) that has potential to be used on an occasional basis by individual bats and therefore has potential PRF-I suitability.

6.1.3 The other 14 trees lacked features suitable for roosting bats and were therefore classified as being of negligible bat roost potential; work to these trees is unlikely to have any impact on bats or their roosts.

6.2 Impact Assessment

Overview

6.2.1 The work to trees 3, 5, 10, 11, 12, 13, 22, 44, 46, 48, 49, 50, 51 and 52 is unlikely to affect bats or their roosts.

6.2.2 The arboricultural works proposed for the three trees (T2, T4 & T29) is coppicing (T2 & T4) and felling by dismantling (T29) will result in the loss of PRFs and associated roosts, if present. These works have been assessed in accordance with the mitigation hierarchy during the operational period and post-operational, as follows:

Operational Period

6.2.3 In the absence of precautions and further investigations, the proposed works to T2, T4 and T29 could lead to the disturbance, injury or death of any roosting bats in occupancy at the time of the operations.

Post-Operational Period

- 6.2.4** The works to the three trees classified as potential PRF-I in the absence of mitigation measures will result in the reduction of the available roosting resource for bats in this area.

7 RECOMMENDATIONS

7.1 Risk Assess, Monitor and Manage (Avoidance)

7.1.1 Wherever possible, all PRFs should be retained unaffected, i.e. consideration of avoidance as per the mitigation hierarchy. If works are unavoidable, the following approach is required for T2, T4 and T29 (refer to **Section 7.2**).

7.2 Roost Resource Approach for T2 (P, T4 & T29- PRF-I trees)

Precautionary Working Method Statement

7.2.1 A precautionary method of working during tree works is recommended to mitigate for the potential use of the PRFs by roosting bats for T2, T4 and T29 which are classified as PRF-I. This approach will ensure that the tree works will not 'deliberately' or 'intentionally/recklessly' disturb, injure or kill any bats that may be in occupancy at the time. The precautionary measures to be adopted include:

- A toolbox talk delivered to the arborists before the tree works by a suitably licensed ecologist detailing how bats use trees, legal protections, working methods (i.e. section-felling), potential roost features, actions to be taken if a bat is found and personal safety procedures;
- A repeat inspection of the potential roost feature (PRF) by a suitably licensed ecologist or by arborist under ecological supervision, immediately before the works. If bats are found to be present during the inspection and/or there is evidence of roosting bats and they will be impacted by the works, a mitigation licence will be required for the works to proceed;
- A section-felling approach, taking care when exposing PRF (i.e. dense ivy cover), under the direct supervision of a suitably licensed ecologist. Each section should be carefully lowered to the ground and checked for bats by a licensed ecologist; and
- During the soft-felling process, if any roosting bats are found, work must stop immediately and advice sought from the licensed ecologist; a mitigation licence will likely be required for the felling of the tree (if it has not been felled to the ground at this point).

7.2.2 If these precautionary measures are adhered to, the work to the tree is considered highly unlikely to contravene legislation protecting bats. Therefore, a European Protected Species mitigation licence is not required at this stage to allow these works to

go ahead lawfully.

Compensation

- 7.2.3** Due to the roost switching behaviour exhibited by tree-roosting bats and the quick decay of evidence inside PRFs, it is arguable that all trees with suitable PRFs should be considered part of an available roosting resource that will be used at one time or another by bats. To prevent the reduction in the roosting resource following the tree works, at least three Schwegler 2FN Bat Boxes (or an approved functional equivalent) will be fixed onto suitable neighbouring mature trees. The boxes should be sited so that they are at least 4m high, free of obstruction from nearby branches and situated to face south west or south east.

8 REFERENCES

Bat Tree Habitat Key (2018). *Bat roosts in trees – A guide to the identification and assessment for tree-care and ecology professionals*. Pelagic Publishing, Exeter.

CIEEM (2019b). *Advice Note on the Lifespan of Ecological Reports and Surveys*. CIEEM, Winchester.

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

Mathews F., Kubasiewicz L.M., Gurnell J., Harrower C.A., McDonald R.A., Shore R.F. (2018). *A Review of the Population and Conservation Status of British Mammals*. A report by the Mammal Society under contract to Natural England, Natural Resources Wales and Scottish Natural Heritage. Natural England, Peterborough.

Mitchell-Jones, A. J. & McLeish, A. P. (2004). *Bat Workers' Manual (3rd edition)*. JNCC, Peterborough.

Reason, P.F. and Wray, S. (2025). *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats*. Version 1.2 CIEEM, Ampfield.