137 London Road
Ruscombe
Berkshire
RG10 9HA

Preliminary Roost Assessment

Report ref.: R2709_PRA_a

Report Quality Control Information	
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1 EXECUTIVE SUMMARY

1.1.1 John Wenman Ecological Consultancy LLP was instructed by Phill Dettman to undertake a Preliminary Roost Assessment (PRA) for bats at 137 London Road in Ruscombe, Wokingham. The survey was commissioned to accompany a householder planning application to be submitted to Wokingham Borough Council seeking consent for a proposed extension with alterations of the front hipped roof to a gable roof,the addition of a dormer window on the rear roof elevation and alterations of the rear hipped roof to a flat roof.

1.1.2 The property had no potential bat access points leading into the roof void and no bat droppings were found internally, so the presence of void-dwelling bats is considered highly unlikely. There were no bat access points identified which could provide sufficient space, shelter, protection and conditions for regular use by individual or small non-breeding groups of crevice-dwelling bats, such as the locally recorded common and soprano pipistrelle. The property has been assigned negligible suitability for bats.

1.1.3 The development proposals are considered highly unlikely to result in the death, injury or disturbance of bats; the damage or destruction of a bat roost; or the obstruction of access to a bat roost. As such, a European Protected Species (EPS) mitigation licence would not be required for the planned works to go ahead lawfully. In the unlikely event that bats are encountered during the construction activities, the works must stop immediately and a licensed ecologist should be called to site to attend to the bat and provide advice on how to proceed.

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

2 INTRODUCTION

2.1 Project Background

2.1.1 John Wenman Ecological Consultancy LLP was instructed by Phill Dettman to undertake a Preliminary Roost Assessment (PRA) for bats at 137 London Road in Ruscombe, Wokingham.

2.1.2 The survey was commissioned to accompany a householder planning application to be submitted to Wokingham Borough Council seeking consent for a proposed extension with alterations of the front hipped roof to a gable roof, the addition of a dormer window on the rear roof elevation and alterations of the rear hipped roof to a flat roof.

2.2 Site Location and Context

2.2.1 The property is a detached property located along the north western side of London Road, towards the north of the village of Twyford (central OS grid reference: SU 79199 76584).

2.2.2 The property is in a suburban setting surrounded by neighbouring residential properties and associated private residential gardens with mature scattered trees. Polehampton C of E Junior School's recreational ground is approximately 50m to the west of the site, which is adjacent to King George V Recreation Ground 250m west. Open countryside extends from the edge of Ruscombe approximately 395m to the east and the River Loddon is 900m to the west. Several ponds are situated nearby with the closest being 415m to the south. Several parcels of woodland are also situated nearby including the closest being 565m south and 670m east.

2.2.3 The suburban setting comprises habitats that provide high suitability commuting and foraging opportunities for bats adapted to suburban areas.

2.3 Report Objectives

2.3.1 The aim of the PRA is to ascertain if there is evidence of the presence of bats and/or potential for roosting bats to be present, and therefore whether further survey and/or mitigation would be required for future proposed development activities.

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)I – 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 the site and the surrounding land. The study utilised the following open access resources:

- OS maps and Google Earth – maps and satellite imagery were 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 or relevant planning portal.

4.2 Building Inspection

Survey Details

4.2.1 A detailed inspection of the exterior and interior of the property was undertaken on the 10th June 2024 by Vicky Potts MCIEEM registered under Natural England Bat Survey Class Licence CL18 (Registration no. 2016-27162-CLS-CLS) and Sam Wenman an assistant ecologist, in accordance with good practice guidance (Collins 2023). The equipment used during the inspection comprised binoculars, a high-power (1 million candlepower) LED torch, a headtorch, ladder and PPE (facemask, gloves etc.). The inspection involved a systematic search of the exterior and interior of the structure during daylight hours to compile information on potential and actual bat access points; potential and actual bat roost sites; and any evidence of bat presence.

External Survey

4.2.2 Frequently used bat access points and/or roost sites include (but are not limited to) spaces:

- behind hanging tiles, weatherboarding, soffit boxes and barge boards;
- under lead flashing (particularly around chimneys) and roof tiles/slates; and
- in existing bat boxes.

4.2.3 It is important to note that the two most abundant and widespread bat species, common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus pygmaeus*), typically only require gaps measuring 15mm by 20mm to gain access to a roost inside a building.

4.2.4 The external survey involved a systematic search for evidence of bats including:

- live or dead specimens;
- droppings;
- urine marks;
- fur-oil staining; and
- squeaking noises.

4.2.5 It should be noted that bats can be present in a building while leaving no visible signs externally and wet weather has the potential to wash any evidence away. The search for evidence was focused on (but was not limited to) the ground, windowsills, windowpanes and walls (including cladding and hanging tiles); particularly in places near to potential bat access points and/or roost sites.

Internal Survey

4.2.6 The internal survey comprised a systematic search for evidence of bats on the upper floors of the building (i.e. checking the exterior from windows) and inside the roof and eave spaces. Evidence of bats found during an internal inspection can include:

- live or dead specimens;
- droppings;
- urine marks;
- fur-oil staining;
- feeding remains (i.e. moth wings);
- squeaking noises;
- bat-fly (Nycteribiid) pupal cases; and
- odour.

4.2.7 It should be noted that only specimens or droppings can be relied upon in isolation to confirm the presence of a bat roost.

4.2.8 Frequently used roosting locations within the roof include (but are not limited to):

- the apex of the gable end or dividing walls;
- the top of chimney breasts;

- ridge and hip beams;
- mortise and tenon joints;
- behind purlins; and
- between tiles and roof lining.

Survey Limitations and Validity

4.2.9 There were no significant survey limitations because PRAs can be carried out at any time of year under any weather conditions and the building was fully accessible.

4.2.10 It should be noted that it is not always possible to inspect all potential roost sites during a survey, particularly for bat species which typically roost in hidden crevices. Therefore, an absence of bat evidence found during a survey does not necessarily equate to evidence of bat absence in a building.

4.2.11 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 linked private gardens with mature scattered trees in the suburban setting resembles continuous habitat that could be used as flight paths connecting to high-quality foraging habitats in the nearby open countryside for any bats roosting locally.

5.1.2 Bat mitigation licences that have been granted within the last 10 years inside a 2 kilometre radius of the property are detailed in **Table 1** below.

Table 1. Bat mitigation licences granted within a 1km radius of the property (Source: MAGIC).

Case Reference of Granted Licence	Species on the Licence	Licensable Period	Licensable Works	Distance (m)
2020-44644-EPS-MIT	Brown long-eared Common pipistrelle	05/02/2020 to 31/08/2020	Destruction of resting place	377m NW
2020-49294-EPS-MIT	Common pipistrelle Soprano pipistrelle	14/10/2020 to 31/08/2025	Destruction of resting place	495m SE
2019-43241-EPS-MIT	Brown long-eared Common pipistrelle Soprano pipistrelle	20/11/2019 to 30/04/2025	Destruction of resting place	1766 m SW

5.2 Building Inspection

5.2.1 The findings from the external and internal inspections carried out for the property are described with photographs and annotated in a plan, as follows:

External Survey

5.2.2 The property was a detached brick built residential bungalow with two hipped roofs and a small gable end to the front. There was a flat roof detached garage to the north western side (**Photographs 1, 2 & 3**).

Photograph 1. Front of property viewed from southeast.

Photograph 2. Rear of property viewed from northwest.

Photograph 3. Garage to the north western side of the bungalow

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5.2.3 The plain flat roof tiles were flat and intact, and the ridge and hip tiles were also intact with mortar (**Photograph 4**). There was guttering at the base of the roof tiles around the bungalow which obstructed any potential access points (**Photograph 5; Target note 1**). Lead flashing was tight around the flue pipes, chimney and skylights (**Photographs 6 & 7**). The overhanging uPVC vented soffits were tight throughout with sealant (**Photograph 8**).

Photograph 4. Flat roof tiles in place and intact, and ridge and hip tiles fully mortared.

Photograph 5. Guttering at the base of the roof tiles.

Photograph 6. Lead flashing tight around the flue pipes.

Photograph 7. Lead flashing tight around the skylight and chimney.

Photograph 8. Vented uPVC soffits tight around the eaves.

5.2.4 The detached garage was of brickwork construction. The roof was tightly lined with bitumen roofing felt and uPVC barge boards (**Photograph 9**). There was one broken roof tile on a small tiled section to the front of the garage, which did not extend into a suitable crevice (**Photograph 10; Target note 2**).

Photograph 9. Garage with a flat bitumen lined roof and uPVC barge boards.

Photograph 10. Broken roof tile to the front of the garage.

Internal Survey

5.2.5 The roof space was accessed via a loft hatch. The space had a maximum height of approximately 2.5m and was used for storage. The floor was boarded in places and insulated with fibreglass insulation. The eaves were open (**Photograph 11**). The roof was lined with a bitumen roofing felt which had some gaps around the flue pipes but was otherwise intact and there was a small section of breathable roofing membrane on the rear roof elevation following repairs to this area (**Photographs 12 & 13; Target notes 3, 4 & 5**). The ridge was cobwebbed. The roof void was well lit with two skylights present (**Photograph 14**). The chimney was tight to the felt and heavily cobwebbed (**Photograph 15**). There was evidence of dead wasps nest but no active nests were visible.

Photograph 11. Roof void boarded with fibreglass insulation, and eaves open.

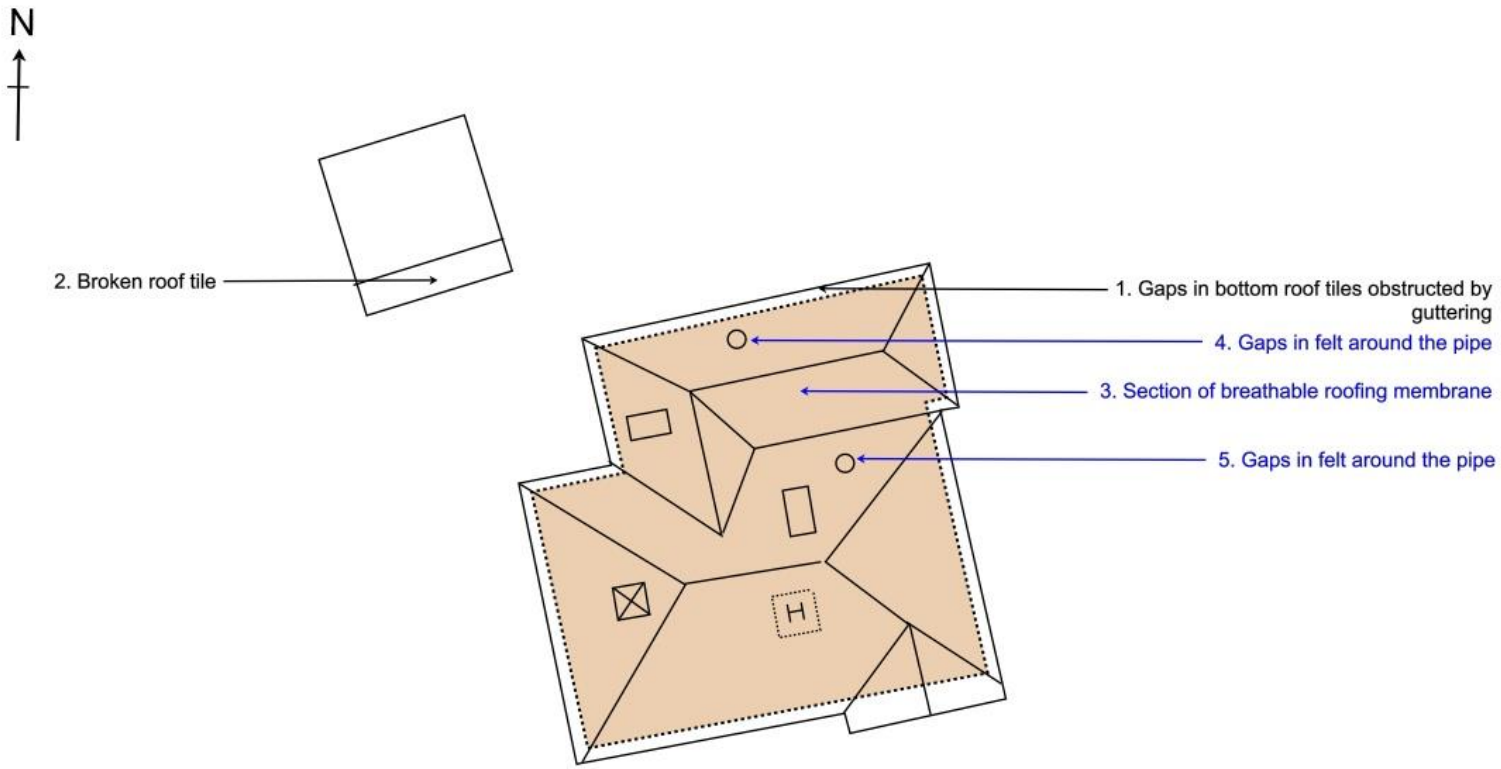
Photograph 12. Gap around a flue pipe.

Photograph 13. Small section of roof with breathable roofing membrane.

Photograph 14, Skylight in the front section of the roof.

Photograph 15. Heavily cobwebbed chimney.

PRELIMINARY ROOST ASSESSMENT FINDINGS



Chimney | Roof space | H Loft hatch | External Target note | Internal Target note

Drawn by:	Date	Scale:	137 London Road Ruscombe	JOHN WENMAN ecological consultancy
VP	July 2024	Not to scale	Preliminary Bat Roost Assessment Findings	

6 DISCUSSION

6.1 Assessment of Potential Roost Suitability

6.1.1 The linked residential gardens with scattered trees in the suburban setting resembles continuous habitat that could be used as flight paths connecting to high-quality foraging habitats in the nearby open countryside for any bats roosting locally. Furthermore, the search of granted bat mitigation licences identified three species known to be roosting within a 2km radius of the property: common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*pipistrellus pygmaeus*), and brown long-eared bat (*Plecotus auritus*).

6.1.1 The property had no potential bat access points to the exterior which was tightly fitted and intact throughout. There were gaps around the lowest roof tiles however they were obstructed by guttering (**Photograph 5; Target note 1**). The garage had a broken roof tile however the gap was superficial only (**Photograph 10; Target note 2**). There were gaps in the roofing felt around two pipes exposing the roof to the interior of the roof however they were tightly fitted with no access points visible (**Photograph 12; Target notes 4 & 5**). There was a small patch of breathable roofing membrane however it was tight to the timbers (**Photograph 13; Target note 3**).

6.1.2 The roof void had sufficient space for internal flight and suitable conditions for supporting individual or small numbers of void-dwelling bats, such as the locally recorded brown long-eared bat (*Plecotus auritus*). However no bat droppings were found internally and no access points were identified to the exterior of the bungalow, so the presence of void-dwelling bats is considered highly unlikely. There were also no gaps suitable for crevice dwelling bats, such as the locally recorded common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*pipistrellus pygmaeus)* bats.

6.1.3 Therefore, the property has been assigned negligible suitability for crevice-dwelling bats overall (see **Appendix 1** for potential suitability categories).

6.2 Impact Assessment and Recommendations

6.2.1 The survey findings demonstrate that the development proposals are considered unlikely to result in the death, injury or disturbance of bats; the damage or destruction of a bat roost; or the obstruction of access to a bat roost. As such, a European Protected Species (EPS) mitigation licence would not be required for the planned works to go ahead lawfully.

6.2.2 In the unlikely event that bats are encountered during the construction activities, the works must stop immediately and a licensed ecologist should be called to site to attend to the bat and provide advice on how to proceed; works should bot continue until further written advice has been received. At this stage, an EPS mitigation licence may be required to permit the work to recommence lawfully.

7 REFERENCES

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. (2023). *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats.* CIEEM, Ampfield.

APPENDIX 1 – POTENTIAL SUITABILITY CATEGORIES FOR ROOSTING BATS

The categories detailed in **Table 2** below are derived from the '*Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)'* (Collins 2023) and provide guidance for assessing the potential suitability of buildings (and other structures) for roosting bats. These categories are applied using professional judgement and irrespective of whether the presence of a bat roost has been confirmed during a survey, as additional bat roosts could be present which have not yet been discovered.

Table 1. Categories for potential suitability of buildings (and other structures) for roosting bats.

Potential Suitability	Category Justification
None	A building (or structure) that has no features likely to be used by any roosting bats at any time of the year (i.e. a complete absence of cracks, crevices or voids that could provide suitable shelter).
Negligible	A building (or structure) that has no obvious features likely to be used by roosting bats, but in this case a small element of uncertainty remains as bats will occasionally use small and apparently unsuitable features. This category may also be used where a bat could potentially roost due to one attribute, but it is considered unlikely due to another attribute (e.g. a feature that is subject to constant illumination from artificial lighting).
Low	A building (or structure) that has one or more potential roost sites suitable for opportunistic use by individual bats at any time of the year. However, these potential roost sites for bats do not provide sufficient space, shelter, protection, conditions and/or surrounding suitable habitat to be used regularly or by large numbers (i.e. unlikely to be suitable for a maternity colony and not a classic hibernation site).
Moderate	A building (or structure) that has one or more potential roost sites suitable for regular use by individual bats, or small non-breeding groups, due to sufficient space, shelter, protection, conditions and surrounding habitat. However, these potential roost sites for bats are unlikely to support a roost of high conservation status with regards to the type of roost only (i.e. maternity colonies and classic hibernation sites).
High	A building (or structure) that has one or more potential roost sites suitable for use by large numbers of bats more regularly and for longer periods of time due to sufficient space, shelter, protection, conditions and surrounding habitat. These potential roost sites for bats are capable of supporting high conservation status roosts (i.e. maternity colonies and classic hibernation sites).

APPENDIX 2 – DEFINITION OF BAT ROOST TYPES

The potential suitability of a building in conjunction with any evidence of bat presence is used to provide an initial assessment of likely roost type and importance. The types of roost considered are based on the following Natural England definitions:

- Day roost – a summer resting place used by individual bats, or small non-breeding groups, during the day;
- Night roost – a resting place used by individual bats on occasion, or by a whole colony regularly, during the night;
- Feeding perch – a resting place used by individual bats, or a few individuals, primarily for short periods of feeding during the night;
- Transitional roost – a place used by a few individual bats, or occasionally small groups, for a short period of time upon waking from hibernation or in the period prior to hibernation;
- Maternity roost – a place used by small to large groups of female bats to give birth and raise their young to independence;
- Hibernation roost – a place used by individual bats, or in groups, during winter where there is a constant cool temperature and high humidity; and
- Satellite roost – a place used by a few individuals to small groups of breeding female bats found in close proximity to the main nursery colony throughout the breeding season.

The importance of a bat roost is underpinned by the conservation status of the suspected species (i.e. the distribution/rarity of a species in a specific geographic location) and the type of roost (i.e. not all roosts have the same level of importance in supporting the local bat population). Further roost characterisation surveys may be required to fully determine the importance of a confirmed roost to allow for a robust impact assessment.

APPENDIX 3 – FURTHER SURVEY RATIONALE

In cases where no evidence of use by bats is found during a building inspection but the possibility of their presence cannot be ruled out, further presence/likely absence survey is likely to be required if the development proposals will impact potential roost sites. Emergence surveys are carried out to establish the presence or likely absence of roosting bats in buildings (and other structures) and these are designed in accordance with the '*Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)'* (Collins 2023) detailed in **Table 3** below.

Table 2. Recommended further survey for establishing presence/likely absence of roosting bats in buildings (and other structures).

Potential Suitability	Further Survey
None	No further surveys are required.
Negligible	No further surveys are required.
Low	A minimum of one dusk emergence survey visit should be undertaken in the period of May to August. However, if all areas (including cracks, crevices and voids) can be thoroughly inspected and no evidence of use by bats is found, then emergence surveys may not be required. In cases where a complete inspection cannot be carried out, professional judgement and proportionality should be applied when assessing the impacts of the development proposals.
Moderate	A minimum of two dusk emergence survey visits should be undertaken in the period of May to September, with at least one of the surveys between May and August; the survey visits should be spaced at least three weeks apart.
High	A minimum of three separate dusk emergence survey visits should be undertaken in the period of May to September (inclusive), with at least two of the surveys between May and August; the survey visits should be spaced at least three weeks apart.

In cases where the PRA and/or further survey establishes the presence of roosting bats in a building (or structure), this will likely trigger the need for roost characterisation to collect sufficient information to inform the impact assessment and mitigation strategy. The roost characterisation comprises information collected during the PRA, emergence surveys and by other methods, such as DNA analysis of bat droppings, and ultimately aims to determine the bat species roosting; the number of bats the roosts support; the roost access points; the locations of the roosts and the types of roost present. This

information is crucial when applying for planning permission and/or a European Protected Species mitigation licence.