

45 Luckley Road
Wokingham
Berkshire
RG41 2ES

Preliminary Roost Assessment

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1 EXECUTIVE SUMMARY

- 1.1.1** John Wenman Ecological Consultancy LLP was instructed by Vikki Martin to undertake a Preliminary Roost Assessment (PRA) for bats at 45 Luckley Road, Wokingham, Berkshire. The survey was commissioned to accompany a householder planning application to be submitted to Wokingham Borough Council seeking consent for a loft conversion and associated extensions and roof works.
- 1.1.2** The property lacked potential bat access points leading into the roof void and no bat droppings were found internally, so the presence of void-dwelling bats was considered highly unlikely. The bungalow had roof coverings and soffits that were tightly fitted and lacked crevice features suitable for bats; superficial features in the roof e.g. broken tiles, were of negligible suitability for bats.
- 1.1.3** 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. 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 2019).

2 INTRODUCTION

2.1 Project Background

2.1.1 John Wenman Ecological Consultancy LLP was instructed by Vikki Martin to undertake a Preliminary Roost Assessment (PRA) for bats at 45 Luckley Road in Wokingham, Berkshire.

2.1.2 The survey was commissioned to accompany a householder planning application to be submitted to Wokingham Borough Council seeking consent for a loft conversion and associated extensions and roof works.

2.2 Site Location and Context

2.2.1 The detached bungalow is situated on the southern side of Luckley Road in Wokingham, Berkshire (OS Grid Ref: SU80976726). The bungalow has other residential dwellings immediately to the east and west, and on the opposite side of the Road to the north. Further residential areas of Wokingham are situated to the north and west.

2.2.2 The land beyond the railway line about 35m to the east comprises the open land of Ludgrove School's grounds and beyond that the farmland at Gray's Farm just under 1km to the east. The Forestry Commission's woodland plantation at Gorrick's Plantation is just under 1km to the south. The railway's eastern edge is bordered by a strip of deciduous woodland – a habitat of principal importance for conservation, which follows the railway line linking it with more extensive woodland to the south.

2.2.3 Overall, the surrounding suburban and woodland and open landscape within a 1km radius of the site, offer moderate to good commuting and foraging habitats for bats adapted to roosting in a suburban environment.

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)l – 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 bungalow was undertaken on the 2nd January 2025 by John Wenman MCIEEM – an ecologist registered under Natural England Bat Survey Class Licence CL18 (Registration no. CL18 2016-23859-CLS-CLS) 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** A search of the Wokingham Borough Council planning portal revealed a single former planning application for the property dating from 1998 relating to the existing rear and side extension; there was no associated bat survey data for the property.
- 5.1.2** The MAGIC website shows that the bat mitigation licences that have been granted within the last 15 years inside a 2 kilometre radius of the site are as follows in **Table 1** below.

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

Case Reference of Granted Licence	Species on the Licence	Licensable Period	Licensable Works	Distance (m)
2018-34805-EPS-MIT	Brown long eared & common pipistrelle	31/05/2018 - 29/05/2023	Destruction of resting places	1102
2015-11806-EPS-MIT	Common pipistrelle	05/09/2015 - 26/08/2017	Destruction of resting place	1186
2014-2425-EPS-MIT	Brown long eared & common pipistrelle	22/07/2014 - 31/10/2015	Destruction of resting places	1704
2014-3612-EPS-MIT	Soprano pipistrelle	24/10/2014 - 22/10/2019	Destruction of resting place	2000

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 is a detached brick-built residential bungalow with a hipped, tiled roof and single storey extension and two chimneys on the eastern side (**Photographs 1 - 4**).



Photograph 1. The bungalow viewed from the front (north)



Photograph 2. The bungalow viewed from the rear (south)



Photograph 3. The bungalow's eastern side showing the existing extension and associated chimney



Photograph 4. The bungalow's western side viewed from the neighbouring property.

5.2.3 The roof tiles were flat, concrete tiles that were on the whole in place with no gaps suitable for roosting bats. There were slighting raised tiles on the southern elevation but the gaps were narrow and superficial and often filled with moss and of negligible suitability for roosting bats (**Target note 1; Photograph 6**). Two partly broken tiles were visible on the western elevation but these did not result in gaps suitable for bats (**Target note 2; Photograph 9**). The ridge and hip tiles were all in place and fully mortared. The soffits were formed of uPVC and were tightly fitted to the brickwork on all the elevations (**Photograph 5**). Lead flashings around the two chimneys on the eastern side were tightly fitted; a slight gap by the gutter on the southernmost chimney was superficial and unsuitable for bats (**Target notes 3 & 4; Photographs 7 & 8**).



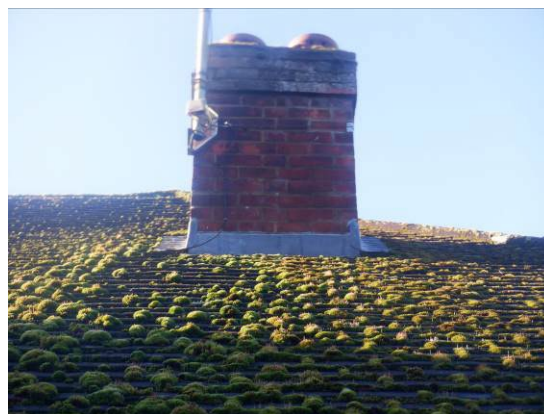
Photograph 5. Tightly fitted uPVC soffits on all elevations.



Photograph 6. The flat and tightly fitted tiles on the rear (southern) elevation with a few superficially raised tiles of negligible bat roost potential.



Photograph 7. Tightly fitted lead on side of southernmost chimney with open gap of negligible extent by gutter.



Photograph 8. Tightly fitted lead around the main (northernmost) chimney.



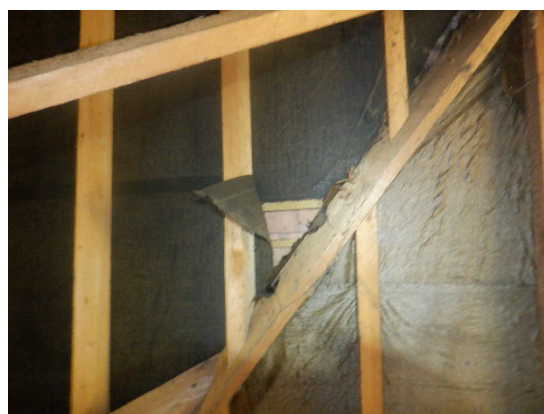
Photograph 9. Broken tiles on the western elevation not leading to gaps suitable for bats.

Internal Survey

- 5.2.4** Internally the bungalow's roof void was accessible via a first floor hatch. The void had an estimated floor to ridge height of approximately 3.5-4m centrally with a much lower roof height of approximately 1.25m in the small extension on the eastern side. The ridge was cobwebbed. The roof was lined partly with paper backed felt at its northern end, and partly with bitumen felt elsewhere; small tears were visible in both sections, but primarily in the paper backed felt (**Target note 7 & 8; Photographs 9 - 10**).



Photograph 9. Section of roof with paper backed felt with occasional tears.



Photograph 10. Section of roof with bitumen felt with occasional tears.

5.2.5 The floor was mostly boarded centrally with in foil covered fibreglass insulation around the margins, which mostly filled the eaves (**Photograph 11**). The main chimney was visible in the void and this was of brick construction with cement render. It was tightly fitted to the timbers and felt around its margins and cobwebbed (**Target note 6; Photograph 12**). A former wasp nest was situated at the eaves in the south eastern corner (**Target note 5**). No bats or evidence of bats was visible within the void.

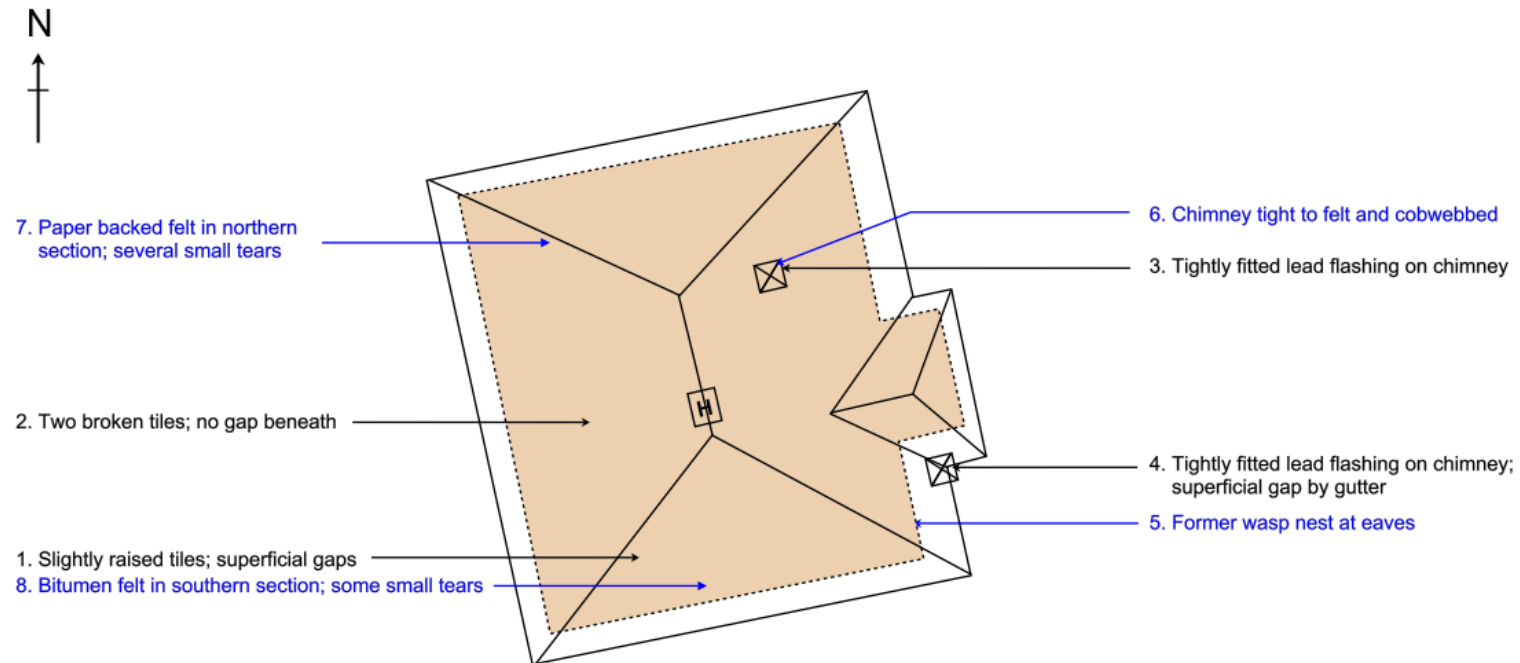


Photograph 11. Foil covered fibreglass insulation at roof margins.



Photograph 12. The chimney tight to the roof and cobwebbed.

PRELIMINARY ROOST ASSESSMENT FINDINGS



 Chimney
  Roof void
  Hatch
  Internal Target note
  External target note

Drawn by:	Date:	Scale:	45 Luckley Road Wokingham	
JW	Jan 2025	Not to scale	Preliminary Roost Assessment Plan	

6 DISCUSSION

6.1 Assessment of Potential Roost Suitability

6.1.1 The suburban setting adjacent to open land with woodland and woodland strips offers moderate to good quality foraging habitats for bats adapted to roosting in a suburban environment. Furthermore, the search of granted bat mitigation licences identified three species known to be roosting within a 2km radius of the site: common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*pipistrellus pygmaeus*) and brown long-eared bats (*Plecotus auritus*), although all the granted licences were for sites more than 1km from the property.

6.1.1 The property showed no evidence of the presence of bats and lacked features that could offer access or crevice roosting opportunities for bats; occasional features such as partly broken tiles, were currently unsuitable for supporting crevice-dwelling bats or acting as access points. Therefore, the property has been assigned negligible suitability for bats overall (see **Appendix 1** for potential suitability categories).

7 IMPACT ASSESSMENT

7.1 Potential Impacts of Development Proposals

Overview

- 7.1.1** The householder planning application to be submitted to Wokingham Borough Council seeks consent for a loft conversion and associated extensions; work which will affect the existing roof covering and void. The impacts of the proposals have been assessed in accordance with the mitigation hierarchy during construction and post development, as follows:

Construction Phase

- 7.1.2** The development proposals will affect a dwelling of negligible roost suitability. Therefore, the proposed works are considered unlikely to result in the damage and/or destruction of a bat roost or cause disturbance and/or harm to bats. A European Protected Species (EPS) mitigation licence would not be required to allow the works to go ahead lawfully.

Post Development

- 7.1.3** The development proposals are unlikely to result in the long-term loss or damage of a bat roost that could adversely impact local bat populations.

7.2 Recommended Actions

- 7.2.1** 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.
- 7.2.2** 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 not 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.

8 REFERENCES

CIEEM (2019). *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 2. 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 3. 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.